

**Ipswich Borough Council Local Plan Review Representations made at Regulations 19 (Final Draft Stage) 15<sup>th</sup> January – 2<sup>nd</sup> March 2020  
Modification Spreadsheet with Council's Responses to Representations**

<b>5.1 Core Strategy and Policies (DPD) Review</b>				
<b>Chapter/ Section</b>	<b>Main Issue</b>	<b>Representation(s)</b>	<b>IBC Agree/ Disagree/ Resolvable by Main Mod(s)</b>	<b>Proposed Main Mod(s) (if applicable)</b>
Chapter 2 - The Planning System	Main issue 1: Important we continue to be consulted in relation to emerging Neighbourhood Development Plans in order to work with local communities to deliver and maintain sustainable healthcare.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26230)	Noted - no modification required.	
Chapter 2 - The Planning System	Main issue 2: Support the spatial strategy for continued urban regeneration in central Ipswich, IGS and Humber Doucy Lane.	Babergh and Mid Suffolk District Councils (Rep ID: 26463)	Noted - no modification required.	

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<p>Chapter 4 – The Duty to Co-operate</p>	<p>Main issue 1: Important to remember that improved or newly created infrastructure, alone, will not fully mitigate the impact of development growth. Resource and revenue implications provide a very significant risk to the delivery of primary care services and we should continue to work together to identify ways in which sustainable health care services can be delivered and how development can contribute to healthy communities and the training and recruitment of health care professionals.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26222)</p>	<p>Noted - no modification required.</p>	<p><a href="#"><u>See Plan 5 – Ipswich Ecological Network</u></a></p>
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Chapter 4 – The Duty to Co-operate	Main issue 2: ESNEFT is undergoing a Sustainability Transformation Plan (STP) to determine how acute hospital healthcare provision will be provided. Significant investment in healthcare facilities and services is/ will be taking place, to meet requirements of existing and future catchment population by planned new housing growth. To deliver the STP a planning policy basis is needed.	East Suffolk & North Essex NHS Foundation Trust (Rep ID: 26262)	Noted - no modification required.	
Chapter 4 – The Duty to Co-operate	Main issue 3: Supportive of cross boundary working with local authorities across the ISPA to address highways issues.	Highways England (Rep ID: 26587)	Noted - no modification required.	

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<p>Chapter 4 – The Duty to Co-operate</p>	<p>Main issue 4: East Suffolk is tasked with making modifications to their plan. SOCS very critical of the 'Statement of Common Ground' issued last year and submitted a response to the emerging Mid Suffolk Local Plan Consultation in addition to Suffolk Coastal District Council. SOCS attended and gave oral evidence to the East Suffolk Plan Inquiry. Feel the Duty to Cooperate has not been effectively achieved within this Draft; nor has it by the partner local authorities.</p>	<p>Save Our Country Spaces (Rep ID: 26347)</p>	<p>Disagree for the following reasons: IBC works very closely with East Suffolk e.g. jointly prepared the Scoping Paper for the Suffolk Coastal Local Plan and emerging Ipswich Local Plan Sustainability Appraisal; Joint signed SoCG to ensure Humber Doucy Lane policies reflect each other; Joint Landscape Impact Assessment with Babergh, East Suffolk and IBC to ensure the fringes of Ipswich are protected from inappropriate development; plans for Joint Master Planning of the two cross-border sites between IBC and East Suffolk Councils regarding land to the north of Humber Doucy Lane; joint working through ISPA to reduce the impact of traffic on the town centre of Ipswich through the Transport Mitigation Strategy and developing Action Plan.</p>	
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<p>Chapter 4 – The Duty to Co-operate</p>	<p>Main issue 5: The Duty to Cooperate is hard for Ipswich to achieve when partner organisations are reluctant to take ownership/ responsibility for the adverse impacts they are imposing on the County Town. Ipswich has little power/ control for resolution.</p>	<p>Save Our Country Spaces (Rep ID: 26343)</p>	<p>Disagree for the following reasons: Ipswich is working closely with the ISPA authorities of Suffolk County Council, Babergh District Council, Mid Suffolk District Council and East Suffolk to mitigate the impact of traffic arising from neighbouring districts on Ipswich Town Centre. Through ISPA, transport modelling was jointly funded with the aim of producing research data to assist in the design of mitigation measures to offset peak transport flows in 2026 and 2036 i.e. the local plan period on roads in and around Ipswich. It was found that only 54% of journeys started and ended in Ipswich therefore proving that there was sufficient traffic generated in Ipswich from outside the Borough. The consultants acting on behalf of the ISPA authorities have designed mitigation measures ; an action plan is being produced jointly by the ISPA authorities to fund these measures together with modal shift measures . Modal shift is an agreed focus for sustainable transport measures. Prior to COVID for example, only 17% of people used buses in Ipswich to get to work. In addition there was a joint air quality screening report produced and an air quality report (the latter being wholly funded by IBC). Suffolk County Council has banned cars from a number of streets to encourage cycling initially for 6 months for work purposes principally. In addition £1.4million, of which the county has</p>	
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			<p>committed 50% of this expenditure for Suffolk to be used in Ipswich to encourage modal shift.</p> <p><a href="https://www.ipswichstar.co.uk/news/cycling-boost-for-ipswich-1-6746459?utm_medium=Email&amp;utm_source=Newsletter&amp;utm_campaign=DM28190">https://www.ipswichstar.co.uk/news/cycling-boost-for-ipswich-1-6746459?utm_medium=Email&amp;utm_source=Newsletter&amp;utm_campaign=DM28190</a></p>	
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Chapter 4 – The Duty to Co-operate	Main issue 6: There is no cooperation between local authorities such as has happened around Cambridge or Norwich.	Ravenswood Environmental Group (Rep ID: 26637)	Disagree for the following reasons: IBC works very closely with East Suffolk e.g. jointly prepared the Scoping Paper for the Suffolk Coastal Local Plan and emerging Ipswich Local Plan Sustainability Appraisal; Joint signed SoCG to ensure Humber Doucy Lane policies reflect each other; Joint Landscape Impact Assessment with Babergh, East Suffolk and IBC to ensure the fringes of Ipswich are protected from inappropriate development; plans for Joint Master Planning of the two cross-boundary sites between IBC and East Suffolk Councils regarding land to the north of Humber Doucy Lane; joint working through ISPA to reduce the impact of traffic on the town centre of Ipswich through the Transport Mitigation Strategy and developing Action Plan.2. Substantial joint working on improving air quality and reducing the impact on traffic ( see Rep immediately above.)	
Chapter 4 – The Duty to Co-operate	Main issue 7: Support that the Council has sought to co-operate with neighbouring authorities and statutory bodies on key strategy and cross-boundary issues. This is important given the tightly drawn boundary which constraints the ability to meet development needs.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26641)	Noted - no modification required.	

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Chapter 4 – The Duty to Co-operate	Main issue 8: The Council has not co-operated effectively with neighbouring authorities to meet unmet Ipswich housing need.	Gladman Homes (Rep ID: 26361)	Disagree for the following reasons: IBC has a good reputation for working with neighbouring authorities and is a signatory to all the ISPA SoCG including Iteration 6 prepared prior to submission of the final Draft Ipswich Local Plan to the Secretary of State. This includes a mechanism for dealing with any unfulfilled housing need. The Council has met its required need and 5 year land supply and this is enlarged upon in the Housing Requirement Topic Paper and Addendum which illustrates that the Council's approach to housing is flexible enough to deal with new affordability ratios which came out on 19 March 2020.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_revising_the_ipswich_housing_figure_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_revising_the_ipswich_housing_figure_topic_paper_june_2020.pdf</a>
Chapter 4 – The Duty to Co-operate	Main issue 9: Ipswich's administrative boundary justifies significant efforts to work with neighbouring authorities as a priority on cross boundary issues. Absence of detail weighs against how positively prepared the Final Draft of the Local has been and how effective its approach will be over the plan period. Persimmon also endorse the statements made by the HBF.	Persimmon Homes (Rep ID: 26381)	Disagree for the following reasons; IBC has a good reputation for working with neighbouring authorities and is a signatory to all the ISPA SoCG including Iteration 6 prepared prior to submission of the final Draft Ipswich Local Plan to the Secretary of State. This includes a mechanism for dealing with any unfulfilled housing need. The Council has met its required need and 5 year land supply and this is enlarged upon in the Housing Requirement Topic Paper and Addendum which illustrates that the Council's approach to housing is flexible enough to deal with the new affordability ratios which came out on 19 March 2020.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_revising_the_ipswich_housing_figure_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_revising_the_ipswich_housing_figure_topic_paper_june_2020.pdf</a>

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Chapter 5 – Ipswich – The Place	Main issue 1: Table 2 lists “cheap car parking” alongside sustainable transport modes which is not supported as this would encourage more driving and worsen air pollution.	Andrea McDonald (Rep ID: 26201)	Disagree for the following reasons: the Council acknowledges that 'cheap car parking' could potentially have a negative impact on sustainable transport and air pollution and that is why it is listed in this table. The table identifies 'relatively cheap car parking' as a local issue that the Local Plan will seek to address in order to encourage the use of sustainable transport modes.	
Chapter 5 – Ipswich – The Place	Main issue 2: Health care providers in areas of deprivation are under more pressure than those in areas where deprivation is lower. Due to the extra strain put on health providers in areas of high deprivation, morale and recruitment is lower than areas where the level of deprivation is less. Tackling areas of the highest levels of deprivation must be seen as a priority going forward.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26225)	Agree for the following reason: As noted in the draft Statement of Common Ground between IBC, the CCG and the ENSEFT.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23 - _draft_statement_of_common_ground_with_ccg_esneft.pdf</a>

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<p>Chapter 5 – Ipswich – The Place</p>	<p>Main issue 3: It is good to see that the benefits of health and wellbeing are being considered in initiatives not intrinsically linked to health. Creating a safe and sustainable link between new developments and areas of commerce and community is essential, be it via a well-lit walking path, cycle path or green corridors. The benefits to resident's wellbeing should not be overlooked as linking people that would otherwise be isolated can have a major benefit to mental health.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26226)</p>	<p>Noted - no modification required.</p>	
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<p>Chapter 5 – Ipswich – The Place</p>	<p>Main issue 4: The physical building of a health and/or social facility or improving one is relatively acquirable in most circumstances but there is currently a national shortage of NHS staff in both primary care and secondary care causing capacity issues. LPAs can help aid recruitment by providing local communities that will attract NHS staff to them, by producing key worker housing in and around NHS campuses and facilities, encouraging commerce, designing and creating a vibrant and attractive community.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26227)</p>	<p>Agree for the following reason: As noted in the draft Statement of Common Ground between IBC, the CCG and the ENSEFT.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf</a></p>
<p>Chapter 5 – Ipswich – The Place</p>	<p>Main issue 5: To take account of Environmental Bill, amend biodiversity section to "Prevent loss of biodiversity and implement measures for biodiversity net gain."</p>	<p>Suffolk Wildlife Trust (Rep ID: 26314)</p>	<p>Noted - no medication required: The text comes from the SA scoping report but we do refer to biodiversity net gain throughout the rest of Core Strategy document, specifically Policy DM8 which states that 'all development must incorporate measures to provide net gains for biodiversity.' The Environment Bill is expected to achieve royal assent by the end of the year and will introduce mandatory</p>	

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			biodiversity net gain and the wording of the Local Plan supports this.	
Chapter 5 – Ipswich – The Place	Main issue 6: 5.25; Improving air quality in the increasing number of Ipswich AQMAs (now five) needs to be added as a key challenge. Meeting the Climate Emergency needs to be added as a key challenge.	Save Our Country Spaces (Rep ID: 26382) Northern Fringe Protection Group (Rep ID: 26508)	Disagree for the following reason: Chapter 5 identifies the key issues and challenges for Ipswich over the Plan period. Climatic change and improving air quality are identified as key issues. The plan seeks to address both the key challenges and issues and takes air quality extremely seriously. The Council has an active air quality group, it is producing a Low Emissions SPD and improving the air quality in Ipswich was a major objective of the ISPA Transport Mitigation Strategy. It identified as the major cause of poor air quality in the centre of Ipswich as being caused through traffic . The Mitigation Strategy is moving forward and a small group of officers is preparing a report on how measures will be funded by the ISPA authorities given that trips that start and end in Ipswich only represent 45% of trips in Ipswich. This means a wider strategic approach is required so that ISPA authorities contribute proportionately and that the overall aim of modal shift is supported. The air quality action plan performance is considered regularly and Environmental Health work closely with policy	

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			<p>and development planners in dealing with planning applications and composition of policy relating to air quality and indeed part authored the Low Emissions draft SPD. Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. The key issues and challenges are also considered to reflect the wider Climate Change Emergency Declaration.</p>	
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<p>Chapter 5 – Ipswich – The Place</p>	<p>Main issue 7: 5.26 (table 2); There are inconsistent references throughout the document (6.16, IBC FRA webpage, 8.45, 8.46, 8.225, DM4 PRFA). The situation regarding flood risk assessment within the CS is confusing and makes flood risk impossible to understand for the general public. Requires further clarification.</p>	<p>Save Our Country Spaces (Rep ID: 26382) Northern Fringe Protection Group (Rep ID: 26508)</p>	<p>Disagree for the following reasons: The references have been checked and refer correctly to the Strategic Flood Risk Assessment other than in DM4 where site specific Flood Risk Assessments are also addressed. However, the two abbreviations SFRA and FRA are not currently included in the glossary; adding them may improve clarity for users of the plan. Furthermore, clarifying amendments to paragraph 6.16 have been agreed through the Statement of Common Ground between Ipswich Borough Council and the Environment Agency.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a19_environment_agency_signed_statement_of_common_ground.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a19_environment_agency_signed_statement_of_common_ground.pdf</a></p> <p><a href="#">See Minor changes Reg 19 to Reg 22</a></p>
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Chapter 5 – Ipswich – The Place	Main issue 8: Allocating the land north of Burrell Road for residential development would address the issues identified in chapter 5.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26643)	Disagree for the following reasons: The principle of a residential development at the proposed site is acceptable, however, it has not been the subject to the same assessments as other site allocations e.g. SFRA and SA, or public consultation as a standard part of plan making and so it would be inappropriate to include it at this time. This site only came forward at Regulation 19 stage. The Council has identified a deliverable supply of residential sites and demonstrated that it can meet its housing need over the Local Plan period. The site would instead likely form part of the Council's windfall which is accounted for in the housing supply.	
Chapter 6 – Vision and Objectives	Main issue 1: No comments.	National Grid (Rep ID: 26200)	Noted - no modification required.	
Chapter 6 – Vision and Objectives	Main Issue 2: Object as some existing health infrastructure will require further investment/ improvement to meet the needs of growth in this LP. Provision needed to address development impact on health infrastructure and ensure timely cost-effective delivery of necessary infrastructure improvements.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26205)	Agree for the following reason: As noted in the draft Statement of Common Ground between IBC, the CCG and the ENSEFT. Agreed that no modification necessary.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23 - _draft_statement_of_common_ground_with_ccg_esneft.pdf</a>

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Chapter 6 – Vision and Objectives	Main issue 3: Objective 10 - The CCG is undergoing a data gathering exercise for all primary care facilities in Suffolk with the aim of providing a 6-facet survey. The outcome of this project will be reliable data showing the CCG the general physical condition of all primary care facilities. Once this information is known the CCG will be in a better position to know which facilities require improvement and which facilities are in good condition.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26228)	Noted - no modification required.	
Chapter 6 – Vision and Objectives	Main issue 4: Natural England is satisfied that their recommendations have been taken into account. Natural England considers the approach taken with regards to the natural environment to be sound.	Natural England (Francesca Shapland) (Rep ID: 26289)	Noted - no modification required.	

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<p>Chapter 6 – Vision and Objectives</p>	<p>Main issue 5: Paragraph 6.16 states that the Strategic Flood Risk Assessment (SFRA) has been revised. However, this is currently being updated so this section should be amended. The Local Plan should also refer to the SFRA as being a living document. See comments on DM4 regarding unsoundness.</p>	<p>Environment Agency (Rep ID: 26274)</p>	<p>Agreed: This forms part of the signed Statement of Common Ground between the Environment Agency and IBC (June 2020).</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a19-environment_agency_signed_statement_of_common_ground.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a19-environment_agency_signed_statement_of_common_ground.pdf</a></p>
<p>Chapter 6 – Vision and Objectives</p>	<p>Main issue 6: Whilst support allocation at Humber Doucy Lane, seeking minor amendments to detailed wording. Plan should not make generic references to "future" development or refer to requirement for phasing without appropriate evidence/details. Wording of paragraph 6.17 should be amended to reflect this.</p>	<p>Kesgrave Covenant (Rep ID: 26438)</p>	<p>Agree to remove 'future' from paragraph 6.17 line 8 for the following reason: it is not best practice (this is a hangover from the Preferred Option version of the Draft Ipswich Local Plan which at that time had not defined the site within the Ipswich Boundary). The allocation is supported in more detail by Policy ISPA 2 which was subject to some suggested modifications through the joint SoCG between IBC and East Suffolk between IBC and East Suffolk following the Examination into the Suffolk Coastal Local Plan (within the East Suffolk geographical boundary) - see link. The Council has also commissioned a Heritage Impact Assessment to help inform the master-planning process. The timing of the site is programmed for when the Ipswich Garden Suburb is approaching completion which will be to the back end of the plan. It is not</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25-statement_of_common_ground_with_east_suffolk_council_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25-statement_of_common_ground_with_east_suffolk_council_0.pdf</a></p>

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			therefore at this point appropriate to be more specific on the timing of the phasing until the master planning work has been completed.	
Chapter 6 – Vision and Objectives	Main issue 7: In general agreement with the Vision and Objectives, however, consider that there should be explicit recognition that, unless development is viable (or is subsidised from the public purse) it will not take place and the Vision will not, therefore, be achieved (and is unsound). The word 'viable' needs to be added to Objective 4.	Cardinal Lofts (Mill) Ltd) (Rep ID: 26552)	Disagree for the following reason: The need for development to be viable (or subsidised) in order to take place is accepted as necessary in order for most types of development to come forward and it seems unnecessary to explicitly state this in this part of the Local Plan. Further explanatory text on the need for development to be viable is instead highlighted in Paragraph 8.60 (Policy CS2), 8.118 and 8.122 (Policy CS7), 8.151 (Policy CS12) and Policy CS17, as well as within the development management policies reasoned justifications.	

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Chapter 6 – Vision and Objectives	Main issue 8: General support for the spatial strategy, as set out at paragraphs 6.10 to 6.22.	Cardinal Lofts (Mill Ltd) (Rep ID: 26553)	Noted - no modification required.	
Chapter 6 – Vision and Objectives	Main issue 9: Reference should be made to Government's net zero 2050 policy together with reference to IBC's Climate Emergency Declaration in order for the plan to be sound. Failure to do so could make the CS unlawful.	Councillor Oliver Holmes (Rep ID: 26611)	IBC Disagree: The Ipswich Local Plan includes policies which will help to address climatic change and reduce emissions from greenhouse gases. The vision and objectives of the Local Plan Review are considered to reflect the wider Climate Emergency Declaration that Ipswich Borough Council has made and it is not necessary to explicitly reference this. The Borough Council informally conducted an assessment against the soundness tests as devised by PAS with no significant issues arising and the Council's QC assessed the plan against the soundness tests prior to submission.	

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Chapter 6 – Vision and Objectives	Main issue 10: Objectives should be re-written to state that permitted development will not add to carbon emissions. Reference should be made to air quality/need for development not to increase poor air quality in existing and potentially new AQMAs for the plan to be sound. Continued reference to modal shift could be seen as disingenuous without evidence to show shift is occurring. Need to provide initiatives for developers to make it happen.	Councillor Oliver Holmes (Rep ID: 26613)	Disagree for the following reasons: Objective 5 'Air Quality' requires every development to contribute to the aim of reducing Ipswich's carbon emissions . The Plan also proposes various policies which will help to limit pollution and protect and enhance green spaces and vegetation to preserve air quality. The Council is sincere in its commitments to achieve modal shift from cars to more sustainable modes. Modal shift is being taken forward through the ISPA Transport Mitigation Strategy and Action Plan, and associated work such as the Local Cycling and Walking Infrastructure Strategy (which is supported by Government funding).	
Chapter 6 – Vision and Objectives	Main issue 11: Reference to development at Humber Doucy Lane being "appropriately phased" with IGS is too open-ended. To be sound, no development should take place until a trigger point of 3,200 homes completed.	Councillor Oliver Holmes (Rep ID: 26617)	Disagree for the following reason: The allocation is supported in more detail by Policy ISPA 2 which was subject to some suggested modifications through the joint SoCG between IBC and East Suffolk between IBC and East Suffolk following the Examination into the Suffolk Coastal Local Plan (within the East Suffolk geographical boundary) - see link. The Council has also commissioned a Heritage Impact Assessment to help inform the master-planning process. The timing of the site is programmed for when the Ipswich Garden	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_statement_of_common_ground_with_east_suffolk_council_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_statement_of_common_ground_with_east_suffolk_council_0.pdf</a>

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			Suburb is approaching completion which will be to the back end of the plan. It is not therefore at this point appropriate to be more specific on the timing of the phasing until the master planning work has been completed.	
Chapter 6 – Vision and Objectives	Main issue 12: Consider addition of reference to ecological networks and connectivity to reflect NPPF paragraphs 173(d) and 174(b).	Suffolk Wildlife Trust (Rep ID: 26316)	Disagree for the following reason: Objective 9 refers to the need to protect and enhance high quality, accessible strategic and local open spaces. Policies within the Plan place particular emphasis on the need to protect priority habitats and species and to help establish a coherent ecological network throughout the Borough, in accordance with NPPF paragraphs 173(d) and 174(b). As such it is not considered necessary to make further explicit reference to ecological networks within the Vision and Objectives.	
Chapter 6 – Vision and Objectives	Main issue 13: The Climate Change agenda and climate emergency declaration is insufficiently addressed throughout the document.	Save Our Country Spaces (Rep ID: 26340)	Disagree for the following reason: The vision and objectives of the Local Plan Review are considered to reflect the wider Climate Emergency Declaration that Ipswich Borough Council has made and it is not necessary to explicitly reference this. The spatial option and strategy presented align with the Climate Emergency Declaration.	

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Chapter 6 – Vision and Objectives	Main issue 14: NPPF Paragraph 11 not considered. Growth inadequately assessed against serious adverse effects/ impacts of SA.	Save Our Country Spaces (Rep ID: 26340 & 26342)	Disagree for the following reason: The SA of the Local Plan Review is considered to provide a sound assessment of the anticipated levels of growth against any identified serious adverse effects that it has identified. The result of this was the selection of the strategic option for the Local Plan Review both in terms of quantity and spatial selection of growth.	
Chapter 6 – Vision and Objectives	Main issue 15: Housing/ Jobs growth, including IGS, undermined by lack of assessment of requirement for wastewater infrastructure.	Save Our Country Spaces (Rep ID: 26340) Northern Fringe Protection Group (Rep ID: 26534)	Disagree for the following reasons: - IBC commissioned a Cross Boundary Water Cycle Study jointly with East Suffolk Council to understand the impact of likely development on the water environment which includes wastewater infrastructure. This included a level of growth that was in fact higher than that proposed in the submission version of the Local Plan Review due to it being drafted at an earlier stage of plan preparation. The outcome of this Study was that the Water Recycling Centres affected by growth in Ipswich Borough over the Local Plan period can accommodate the level of growth proposed. - Anglian Water have been involved in the preparation of the above mentioned Cross Boundary Water Cycle Study, as well as throughout each stage of the Local Plan Review consultation. The result of this has been the agreement of a Statement of Common Ground.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/revised_08-06-20_a24_-_statement_of_common_ground_with_anglian_water_red_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/revised_08-06-20_a24_-_statement_of_common_ground_with_anglian_water_red_0.pdf</a>

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<p>Chapter 6 – Vision and Objectives</p>	<p>Main issue 16: Concerns throughout document regarding traffic related issues, including delivering the required infrastructure and modal shift and the associated impact on air quality; climate emergency and climate change precipitated flood risk, loss of grade 2 farm land, loss of vital green rim and urban/rural separation with its attendant adverse impacts on the network of wildlife links with green corridors.</p>	<p>Save Our Country Spaces (Rep ID: 26348)</p>	<p>Disagree for the following reasons: The Vision and Objectives for the plan are consistent with the NPPF . The Whole Plan Sustainability Appraisal has been conducted and updated in every stage of plan -making and found no significant negative impact. The Council informally conducted an assessment against the soundness tests as devised by PAS with no significant issues arising and the Council's QC assessed the plan against the soundness tests prior to submission.</p>	
<p>Chapter 6 – Vision and Objectives</p>	<p>Main issue 17: Objective 1 is inadequately demonstrated</p>	<p>Save Our Country Spaces (Rep ID: 26359)</p>	<p>Disagree for the following reason: Objective 1 relates to strategic working with other authorities within the Ipswich Strategic Planning Area. Ipswich Borough Council has a good reputation for working proactively with external organisations and bodies and can demonstrate a significant level of cooperation with other authorities in the preparation of the Local Plan. The Council have sought to demonstrate compliance with Objective 1 through the Statement of Compliance with the Duty to Cooperate.</p>	

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<p>Chapter 6 – Vision and Objectives</p>	<p>Main issue 18: The 4% and 5% affordable housing negotiated does not meet the 31% quoted in objective 2. Evidence of recent job losses in town undermines credibility of job target.</p>	<p>Save Our Country Spaces (Rep ID: 26359)</p>	<p>Disagree for the following reasons:</p> <ul style="list-style-type: none"> <li>- It is acknowledged that the 4% and 5% affordable housing negotiated as part of the S106 negotiations to date does not meet the 31% quoted in objective 2. This was the optimum affordable housing percentage that could be agreed based on viability at the time of determination for the two applications. However, the S106s that have been negotiated for 14/00638/OUTFL and 16/00608/OUT both include trigger points for the affordable housing requirement to be reviewed at different stages as the developments are brought forward. These reviews may result in higher percentages of affordable housing being delivered should it be viable. Ultimately, the 31% affordable housing target is a target that IBC would want to be delivered if viable to do so.</li> <li>- The job target is based on the latest available economic job modelling data from the East of England Forecasting Model which is the tool that all of the ISPA authorities are using to inform job targets within Local Plans. The approximate 9,500 job forecast in the 2017 EEFM has been adopted as IBCs target and covers jobs across all sectors in the Borough.</li> </ul>	
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<p>Chapter 6 – Vision and Objectives</p>	<p>Main issue 19: Lack of justification for Humber Doucy Lane (ISPA4.1) allocation in objective 3.</p>	<p>Save Our Country Spaces (Rep ID: 26359)</p>	<p>Disagree for the following reasons: The Council The land at Humber Doucy Lane was promoted The Council resisted its allocation, as there was recommended as follows in his report of 17th Ja support the allocation of land at North East Ipsw development in preference to any other land in residential development should not come forwa site has been considered on a cross-boundary ba (and Employment Land Availability Assessments) mentioned in the Transport SoCG with SCC. The homes and associated infrastructure is addresse within Objective 3.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a29_-_ibc_scc_transport_and_parking_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a29_-_ibc_scc_transport_and_parking_socg.pdf</a></p>
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<p>Chapter 6 – Vision and Objectives</p>	<p>Main issue 20: Objective 5: Concerns about railway noise/ vibration from intensification of line and traffic from humpback bridge. Current rail noise causes residents' complaints and audible for a distance of about 1/4-1/2 a mile at night causing significant sleep-disturbance especially in summer. 5 point rail plan agreed 2018 and no assessment of diesel pollution. The original indicator of "air quality exceedances" and objective to improve air quality should be reinstated.</p>	<p>Save Our Country Spaces (Rep ID: 26359)</p>	<p>Disagree for the following reasons: noise disturbance would be an amenity issue covered by policy DM18 amenity and broadly by Objective 4 about sustainable development. Whilst we consult with Network Rail and the operational companies, this is really a matter for them and we have no direct control over their operations or timetables.</p>	<p><a href="#">See Chapter 6 – Objectives and Key Targets</a></p>
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<p>Chapter 6 – Vision and Objectives</p>	<p>Main issue 21: Objective 5 (continued):</p> <ol style="list-style-type: none"> <li>1. Inconsistent with national policy, fails to comply with legal limits. Must be requirement.</li> <li>2. Strengthen commitment to Improve Air Quality, no real improvement over past decade.</li> <li>3. No funding in IBC’s financial plan for improving air quality.</li> <li>4.No AQA. Must be completed urgently. Include assessments for early years of developments, construction-related traffic and rail/sea traffic and impacts of different levels of modal shift rather than unsubstantiated levels assumed.</li> <li>5. Little point undertaking an AQA in 2036 as ban on non-electric vehicles. Early years likely to be worst. Suggest earlier assessment.</li> <li>6. Ambiguity over 2004 emission levels cited</li> </ol>	<p>Save Our Country Spaces (Rep ID: 26367) Northern Fringe Protection Group (Rep ID: 26497)</p>	<p>The Objective 5 has been changed to add climate change. In addition, Policy CS1 reiterates the commitment to addressing climate change as a strategic policy as an issue central to the plan. The Council takes air quality very seriously. It has an active air quality group across the Council ; it is producing a Low Emissions SPD and improving the air quality in Ipswich was a major objective of the ISPA Transport Mitigation Strategy. It identified the major cause of poor air quality in the centre of Ipswich as being caused through traffic . The Mitigation Strategy is moving forward and a small group of officers is preparing a report on how measures will be funded by the ISPA authorities given that trips that start and end in Ipswich only represent 45% of trips in Ipswich. This means a wider strategic approach is required so that ISPA authorities contribute proportionately and that the overall aim of modal shift is supported. The air quality action plan performance is considered regularly and Environmental Health work closely with policy and development planners in dealing with planning applications and composition of policy relating to air quality and indeed part authored the Low Emissions draft SPD. CS1 reiterates the commitment to addressing climate change as a strategic policy as an issue central to the plan.</p>	<p><a href="#">See Chapter 6 – Objectives and Key Targets</a></p>
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<p>Chapter 6 – Vision and Objectives</p>	<p>Main issue 22: Objective 6: why 15% modal shift by 2031 target removed given still required for soundness. Imperative that modal shift target for 2026 included. Must report the modal shift levels achieved through Travel Ipswich in AMR (appendix 5 quoted). Evidence needed showing that modal shift can be delivered. Need to illustrate what "additional east-west highway capacity" is. Considerable investment in public transport required. Insufficient firm proposals or funding to deliver the required modal shift levels throughout the CS period. CS is unsound as it lacks a transport solution that supports proposed growth. Switch to electric cars will not solve health impacts.</p>	<p>Save Our Country Spaces (Rep ID: 26383) Northern Fringe Protection Group (Rep ID: 26509)</p>	<p>Disagree for the following reasons: Modal shift is now being taken forward through the ISPA Transport Mitigation Strategy and Action Plan, and associated work such as the Local Cycling and Walking Infrastructure Strategy (which is supported by Government funding). Therefore, it is appropriate to update Objective 6. Additional east-west capacity is addressed through policy CS20 of the Core Strategy and therefore more detail is not needed in Objective 6.</p>	
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<p>Chapter 6 – Vision and Objectives</p>	<p>Main issue 23: Objective 6:</p> <ol style="list-style-type: none"> <li>1. Junctions/ link roads at/near capacity, not addressed. No evidence growth is sound.</li> <li>2. Severe capacity issues in 2026 but no infrastructure projects in Infrastructure Tables. Especially town centre, Ipswich Garden Suburb and A1214.</li> <li>3. Modelling fails to identify when junctions will reach capacity.</li> <li>4. Failing to Improve Access in breach of CS5. Modal Shift assumptions too high, uncompliant with CS20.</li> <li>5. CCC assumes 10% modal shift by 2050. No evidence 15% modal shift deliverable by 2026? CCC assumption should be used.</li> <li>6. Existing walking/ cycling infrastructure substandard, won't enable delivery of modal shift. Need new cycling indicator.</li> </ol>	<p>Save Our Country Spaces (Rep ID:26362) Northern Fringe Protection Group (Rep ID: 26493)</p>	<p>Disagree for the following reasons: The traffic modelling work undertaken (the most up to date being Run 7) identifies capacity issues in the network arising from growth. The Highway Authority is co-ordinating the issues through the ISPA Transport Mitigation Strategy and Action Plan, and associated work such as the Local Cycling and Walking Infrastructure Strategy (which is supported by Government funding). In relation to the A1214, improvements are planned by Highways England through funding bids to the DfT. These are listed in infrastructure Table 8A.</p>	
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<p>Chapter 6 – Vision and Objectives</p>	<p>Main issue 24: Objective 6 (continued): 7. No funding allocated in IBC's financial plan to encourage modal shift. 8. Doesn't include proportionate evidence. New Evidence database incomplete as excludes Transport documents, especially modal shift related and S106 schedules for approved IGS developments which haven't been made publicly available. 9. Concerned that road bridges (and country park) may not be delivered in time (February 2022) to receive £9.8m HIF. If so, then CS is unsound unless alternative funding available. 10. Not positively prepared as fails to fully assess transport infrastructure requirements, especially in relation to timing of delivery (including sewage).</p>	<p>Save Our Country Spaces (Rep ID: 26363) Northern Fringe Protection Group (Rep ID: 26496)</p>	<p>Disagree for the following reasons: Policy CS20 identifies the sources of funding for transport mitigation measures; and the Suffolk County Council Transport Mitigation Strategy is included in the core document library reference D39 <a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/2019-08.ispa_mitigation_strategy.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/2019-08.ispa_mitigation_strategy.pdf</a>. Regarding the matters raised in connection with Ipswich Garden Suburb (policy CS10), the Council resolved to grant outline planning permission to applications IP/14/00638/OUTFL and IP/16/00608/OUT on 4th April 2018, subject to securing planning conditions and a Section 106 Legal Agreement. The Section 106 Legal Agreement and planning conditions have been secured in accordance with the recommendation to Committee on 4th April 2018. This includes submission of details of the foul and surface water drainage strategies and undertaking highways improvements. All documents submitted to support the applications e.g. transport statements are available to view within the relevant planning application documents. There is also a webpage <a href="https://www.ipswich.gov.uk/content/ipswich-garden-suburb-delivery">https://www.ipswich.gov.uk/content/ipswich-garden-suburb-delivery</a> on the delivery of IGS which provides links to the applications and legal agreements. In regard to HIF, IBC have secured funding from Homes England and are</p>	
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			<p>under contract. There are other agreements in place between IBC and relevant parties to transfer funding and deliver these projects within the necessary milestones. IBC are working with developers and Homes England to make sure these milestones remain achievable.</p>	
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Chapter 6 – Vision and Objectives	Main issue 25: Objectives 4 and 9: Need to reference Climate Emergency Declaration.	Save Our Country Spaces (Rep ID: 26370) Northern Fringe Protection Group (Rep ID: 26498)	Disagree for the following reason: The vision and objectives of the Local Plan Review are considered to reflect the wider Climate Emergency Declaration that Ipswich Borough Council has made and it is not necessary to explicitly reference this. The spatial option and strategy presented align with the Climate Emergency Declaration.	
Chapter 6 – Vision and Objectives	Main issue 26: Specific Objectives are required to ensure delivery of key aspects of the CS such as improving transport infrastructure, improving air quality, delivering modal shift and improving accessibility are required. These need to be monitored and reported on to ensure the CS is effective.	Save Our Country Spaces (Rep ID: 26380) Northern Fringe Protection Group (Rep ID: 26507)	Disagree for the following reason: - The objectives of the Local Plan Review set out in 6.8 and expanded upon in Chapter 11 are considered to be robust and sound. The indicators and targets will be monitored through future Authority Monitory Reports that IBC produce annually following the adoption of the Local Plan Review.	

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Chapter 6 – Vision and Objectives	Main issue 27: The Vision needs to include an improvement in air quality levels and compliance with legally binding targets. Climate emergency also needs to be included.	Save Our Country Spaces (Rep ID: 26380) Northern Fringe Protection Group (Rep ID: 26507)	Disagree for the following reason: The spatial option and strategy presented align with the Climate Emergency Declaration. Objective 5 states that every development should contribute to the aim of reducing Ipswich's carbon emissions.	
Chapter 6 – Vision and Objectives	Main issue 28: Support objectives 2 and 4. Recognise no realistic alternative to locating some development in flood zone 3. Allocating the land north of Burrell Road for residential development would help meet the objectives of the Local Plan.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26644)	Disagree for the following reasons: The principle of a residential development at the proposed site is acceptable, however, it has not been the subject to the same assessments as other site allocations e.g. SFRA and SA, or public consultation as a standard part of plan making and so it would be inappropriate to include it at this time. This site only came forward at Regulation 19 stage. The Council has identified a deliverable supply of residential sites and demonstrated that it can meet its housing need over the Local Plan period. The site would instead likely form part of the Council's windfall which is accounted for in the housing supply.	

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Chapter 6 – Vision and Objectives	Main issue 29: Under paragraph 35 of the National Planning Policy Framework ('The Framework') we consider that this Plan is unsound as some aspects are not effective, or consistent with national policy. We have identified in detail below where we find the Plan unsound and what measures are needed to make the Plan sound. In particular we have recommended the inclusion of specific policy references for heritage assets and identified mitigation within Policies SP2 (Land Allocated for Housing), SP4 (Opportunity Sites), SP5 (Land Allocated for Employment Use), SP11 (The Waterfront), SP12 (Education Quarter), and SP13 (Portman Quarter).	Historic England (Rep ID: 26654)	Agree: Ipswich Borough Council is working with Historic England to resolve the matter via a Statement of Common Ground and the changes therein. Following a meeting with HE on the matter it was apparent that the objection was not to the principal and all the work required was in the plan, however there needed to be more clarity.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf</a>
Chapter 6 – Vision and Objectives	Main issue 30: Acknowledges the positive enhancements to the local plan in terms of the adherence with security measures.	Suffolk Constabulary (Rep ID: 26177)	Noted - no modification required.	

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Chapter 7 – Key Diagram	Main issue 1: The amendment to include the small area of the AONB, as requested at Preferred Options, is supported.	AONB Unit (Rep ID: 26248)	Noted - no modification required.	
Chapter 7 – Key Diagram	Main issue 2: Whilst support allocation at Humber Doucy Lane, seeking minor amendments to detailed wording. Plan should not make generic references to "future" development or refer to requirement for phasing without appropriate evidence/details. Wording of paragraph 7.2 should be amended to reflect this.	Kesgrave Covenant (Rep ID: 26439)	Disagree for the following reasons: The allocation is supported in more detail by Policy ISPA 2 which was subject to some suggested modifications through the joint SoCG between IBC and East Suffolk between IBC and East Suffolk following the Examination into the Suffolk Coastal Local Plan (within the East Suffolk geographical boundary) - see link. The Council has also commissioned a Heritage Impact Assessment to help inform the master-planning process. The timing of the site is programmed for when the Ipswich Garden Suburb is approaching completion which will be to the back end of the plan. It is not therefore at this point appropriate to be more specific on the timing of the phasing until the master planning work has been completed. Agree to the removal of 'future'.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_-_statement_of_common_ground_with_east_suffolk_council_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_-_statement_of_common_ground_with_east_suffolk_council_0.pdf</a> <a href="#">See Chapter 7 Key Diagram</a>

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<p>Chapter 7 – Key Diagram</p>	<p>Main issue 3: Strongly disagree with the proposed change to replace “green rim” with “green trail”. Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it and hence destroy it. Change in name is misleading and is actually to bring forward land at Humber Doucy Lane for development.</p>	<p>Save Our Country Spaces (Rep ID: 26398) Northern Fringe Protection Group (Rep ID: 26517)</p>	<p>Disagree for the following reasons: - The purpose of the green trail remains the same as the green rim as described in the adopted Local Plan. The reason for the name change was because it was brought to the attention of officers that the name "green rim" may falsely give the impression that this land is a de-facto green belt and purely restrictive in purpose. The green rim was established as an ecological and recreational/ accessible corridor and was designated as such to ensure that any development incorporates sufficient links to this corridor. The term "green trail" was considered to be a more accurate name which encompasses both the biodiversity and active travel functions. Where housing growth will be significant in one particular location, large scale natural greenspaces are an additional measure, delivered individually within development projects, to provide an alternative to recreation on European sites are referred to as Suitable Alternative Natural Greenspaces (SANGs). This measure will be required as part of the cross-boundary allocations on land north of Humber Doucy Lane.</p>	
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Chapter 7 – Key Diagram	Main issue 4: Support IP-One Area boundary.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26645)	Noted - no modification required.	
Chapter 7 – Key Diagram	Main issue 5: Object to Waterfront boundary which should be extended westwards to cover land to the North of Burrell Road. This Site is suitable for residential development.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26645)	Disagree for the following reasons: The character and use of the land westwards (predominantly low rise residential) is different from that within the Waterfront boundary (mixed use high rise) and so it would not be appropriate to extend it to include this area. The principle of a residential development at the proposed site is acceptable, however, it has not been the subject to the same assessments as other site allocations e.g. SFRA and SA, or public consultation as a standard part of plan making and so it would be inappropriate to include it at this time. This site only came forward at Regulation 19 stage. The Council has identified a deliverable supply of residential sites and demonstrated that it can meet its housing need over the Local Plan period. The site would instead likely form part of the Council's windfall which is accounted for in the housing supply.	

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<p>Chapter 7 – Key Diagram</p>	<p>Main issue 6: Regarding the delineation of the opportunity areas, it is unclear which boundaries the Council is promoting through this Plan, and which areas are covered by Policies SP11, SP12, and SP13. The Policies Map, IP-One Area inset map and Chapter 6 of the Plan shows detailed boundaries for eight opportunity areas. However, these areas do not match up with illustrative boundaries in The Ipswich Key Diagram. The opportunity areas need to be clearly defined and labelled on the policies map, so that it is clear which policy and supporting text relates to which area, and the extent of the land in question.</p>	<p>Historic England (Rep ID: 26661)</p>	<p>Agreed: Following a meeting with Historic England on the matter it was apparent that the objection was not to the principal and all the work required was in the emerging plan. There does however need to be more clarity and a 'golden thread' through from the Strategic Policies to Site Allocations and the Opportunity Areas. The Opportunity Areas require a vision for what they were designed to achieve and a summary of the character of each Opportunity Area to explain what makes that area unique. In addition, an additional plan of the Opportunity Areas will be inserted to clarify the link between the Site Allocations and Opportunity Areas. This is being addressed through the draft Statement of Common Ground.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27_-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27_-draft_statement_of_common_ground_he_0.pdf</a></p>
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Chapter 7 – Key Diagram	Main issue 7: Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as “Land Allocated for Sport Use” on the basis that it is not required for this purpose. It is proposed that the site is allocated for residential development.	Ipswich School (Rep ID: 26588)	Disagree for the following reasons: the proposed allocation the objector promotes is needed to provide replacement sports facilities for the existing sports facilities land allocated for housing and associated infrastructure at IGS (policy CS10) and therefore the sports allocation needs to be retained.	
Chapter 8 – The Spatial Strategy	Main issue 1: Generally supportive of spatial strategy.	Highways England (Rep ID: 26583)	Noted - no modification required.	
Chapter 8 – The Spatial Strategy	Main issue 2: Re-phrase paragraph 8.7 to clarify that whilst Ipswich Borough may be under-bounded, the Borough will meet its own identified housing needs with the Borough for this Plan.	Babergh and Mid Suffolk (Rep ID: 26467)	Changes are being pursued through a Statement of Common Ground with Babergh and Mid Suffolk District Council's to address this through a Statement of Common Ground which is currently in draft. IBC has had two informal meetings with officers and is awaiting member views. See proposed changes to Paragraph 8.58 on page 9 of the SoCG; deletion of paragraph 8.1.4.1 (page 14) which is the same for settled housing; and changes to policy CS7 on page 16.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a26_-_draft_statement_of_common_ground_with_bmsdc.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a26_-_draft_statement_of_common_ground_with_bmsdc.pdf</a>

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<p>Policy ISPA1 – Growth in the Ipswich Strategy Planning Area</p>	<p>Main issue 1: No viable transport solutions offered to provide the improved infrastructure for sustainable growth. Schemes unlikely to be achievable as planning gain through development. Need to re-write Plan to include sustainable options.</p>	<p>Councillor Oliver Holmes (Rep ID: 26619)</p>	<p>Disagree for the following reasons: The ISPA Transport Mitigation Strategy created through SCC provides clear sustainable options in relation to transport mitigation measures which are being developed in the light of findings from the transport modelling and air quality modelling. The ISPA Officer Group is working to secure funding options for this across the authorities which will allow some cross-boundary mitigation measures related to sites which will have transport impact on Ipswich. Only 45% of journeys start and end in Ipswich. In addition, there is a vision to achieve modal shift and sustainable measures such as the Quality Bus Partnership, promoting 'Smarter Choices' and requiring travel planning for larger developments . These key measures are set out in Policy CS20 and the accompanying text. There is also an officer ISPA working group looking into delivery of sustainable transport and modal shift and how to address funding.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/2019-08.ispa_mitigation_strategy.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/2019-08.ispa_mitigation_strategy.pdf</a></p>
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<p>Policy ISPA1 – Growth in the Ipswich Strategy Planning Area</p>	<p>Main issue 2: Argued for years that previous homes and employment targets set by IBC were too high, unrealistic and based upon flawed evidence. Now clear that previous Plans were unsound and were therefore sub-optimal for Ipswich as we argued strongly at the time. Disappointing that IBC has taken so long to accept this.</p>	<p>Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26521)</p>	<p>Disagree for the following reasons: - The housing requirement is determined by the standard methodology for calculating housing need as per the National Planning Policy Framework (2019). The previous Local Plans that the Council has prepared were formulated on different methodologies due to the fact that they were prepared and adopted before the 2019 NPPF. - The employment targets were also based on the appropriate evidence at the time of the plan preparation. The new evidence, namely the 2017 EEFM results, were not published before the preparation and adoption of the previous Local Plans.</p>	
<p>Policy ISPA1 – Growth in the Ipswich Strategy Planning Area</p>	<p>Main issue 3: The proposed lower targets are more realistic.</p>	<p>Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26521)</p>	<p>Disagree for the following reasons: - The housing requirement is determined by the standard methodology for calculating housing need as per the National Planning Policy Framework (2019). The previous Local Plans that the Council has prepared were formulated on different methodologies due to the fact that they were prepared and adopted before the 2019 NPPF. - The employment targets were also based on the appropriate evidence at the time of the plan preparation. The new evidence, namely the 2017 EEFM results, were not published before the preparation and adoption of the previous Local Plans.</p>	

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<p>Policy ISPA1 – Growth in the Ipswich Strategy Planning Area</p>	<p>Main issue 4: Agree with IBC that it has established a 5- year land supply of 5.06 years including a 20% buffer or contingency in the 5-year supply.</p>	<p>Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26521)</p>	<p>Noted - no modification required.</p>	
<p>Policy ISPA1 – Growth in the Ipswich Strategy Planning Area</p>	<p>Main issue 5: Potential impact of Sizewell C on IGS and CS has not been assessed (rail freight Ipswich-Westerfield).</p>	<p>Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26521)</p>	<p>Disagree for the following reason: there is a separate application process for the Sizewell C application as a Nationally Significant Infrastructure Project and its impacts would be considered through that process. The assessment of noise and vibration from increased train traffic is a matter for the reserved matters applications regarding the Ipswich Garden Suburb based on the evidence available at the time of determination. It is not reasonable to undertake noise/ vibration assessments as part of this Local Plan on this specific site.</p>	

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<p>Policy ISPA1 – Growth in the Ipswich Strategy Planning Area</p>	<p>Main issue 6: Support the recognition within the Plan that the Council will need to work closely with neighbouring authorities regarding future development and infrastructure, as set out in the first strategic objective. However, as expanded upon below we do not consider that the Council have fully explored all opportunities to work with neighbouring authorities to meet full identified housing needs throughout the Plan period as a whole, as also set out in response to the Suffolk Coastal emerging Local Plan (refer to Appendix C)</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26581)</p>	<p>Disagree for the following reasons:  The Council is able to meet both its 5 year land supply and the identified need as well as having the flexibility to incorporate the 2019 affordable housing ratio. The land to the north of Humber Doucy Lane is an example of working with a neighbouring Council. Following area of East Suffolk), East Suffolk and IBC signed a Statement of Common Ground where appropriate changes were agreed to ensure that the two local plans treated the adjoining housing allocations on both sides of the district other ISPA authorities and there is an agreed mechanism within Iteration 6 of the ISPA Statement of Common Ground (pages 8- 13) which clearly sets this approach out.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a21-ispa_statement_of_common_ground_-_v6_june_2020_final.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a21-ispa_statement_of_common_ground_-_v6_june_2020_final.pdf</a></p>
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<p>Policy ISPA1 – Growth in the Ipswich Strategy Planning Area</p>	<p>Main issue 7: Discrepancy in the housing need figure across the ISPA (see table 1). This requires clarification. East Suffolk relies on the 2016 household projections whereas IBC uses the 2014 household projections, thus reducing the IBC housing need figure.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26646)</p>	<p>Disagree for the following reason: The use of the 2016 household projections in the Suffolk Coastal Local Plan was the approach taken by East Suffolk Council based on the planning practice guidance at the time of submission. Ipswich Borough Council is using the 2014 household projections because the planning practice guidance was updated by the Government to confirm that the 2014 household projections should be used for the purposes of identifying overall housing need. The Main Modifications to the Suffolk Coastal Local Plan which were consulted upon between 1 May and 10 July show that East Suffolk Council are proposing to use the lower overall figure as per the 2014 household projections. It would therefore be incorrect for Ipswich Borough Council to use the 2016 based household projections, or any other more recent household projections, as this would be contrary to the standard methodology planning practice guidance. In light of the above, it is recommended that the policy text of Policy ISPA1 is updated to reflect the main modification proposed to the Suffolk Coastal Local Plan and latest (June 2020) version of the ISPA Statement of Common Ground.</p>	<p><a href="#">See Policy ISPA1 Growth in the Ipswich Strategic Planning Area</a></p>
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Policy ISPA2 – Strategic Infrastructure Priorities	Main issue 1: The CCG is very happy to see that health provision is identified as key infrastructure and will work with the council and alliance partners in providing holistic healthcare for the residents of Ipswich.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26206)	Noted - No modification required.	
Policy ISPA2 – Strategic Infrastructure Priorities	Main issue 2: Suggest that policy includes reference to police, community safety and cohesion provision and green infrastructure and suitable alternative natural green space in order to align with the Statement of Common Ground between ISPA authorities which specifically references these points.	East Suffolk Council (Rep ID: 26390)	Agree: Matter resolved via the jointly signed Statement of Common Ground and the changes therein.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_statement_of_common_ground_with_east_suffolk_council_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_statement_of_common_ground_with_east_suffolk_council_0.pdf</a>
Policy ISPA2 – Strategic Infrastructure Priorities	Main issue 3: Encouraging to see that Network Rail is mentioned in Policy ISPA2 Strategic Infrastructure Priorities as a working partner of Ipswich Borough Council to enable the delivery of key infrastructure projects.	Network Rail (Rep ID: 26544)	Noted - no modification required.	

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Policy ISPA2 – Strategic Infrastructure Priorities	Main issue 4: Encourage early engagement on strategic development sites to ensure all impacts are identified and taken into consideration at the masterplan stage.	Network Rail (Rep ID: 26546)	Noted - no modification required.	
Policy ISPA2 – Strategic Infrastructure Priorities	Main issue 5: Funding for A14 not certain. Without robust measures identified by Suffolk County Council, it isn't certain that delivery of the latter stages of the plan can be achieved - vital that a robust manage and monitor approach is maintained throughout the plan period.	Highways England (Rep ID: 26592)	Agree for the following reasons: - IBC and SCC are in the process of agreeing a Statement of Common Ground which covers the matter of infrastructure in table 8a of the Local Plan Review, including A14 improvements. IBC agrees that a manage and monitor approach should be maintained in a similar manner to the Suffolk Coastal Local Plan examination which is also reliant on the delivery of the same A14 improvements.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf</a>
Policy ISPA2 – Strategic Infrastructure Priorities	Main issue 6: On 25/02/2020, Suffolk County Council resolved not to take Northern Bypass scheme forward.	Highways England (Rep ID: 26594)	Changes agreed through the East Suffolk Statement of Common Ground to reflect the changes in Iteration 6 of the ISPA Statement of Common Ground.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_-_statement_of_common_ground_with_east_suffolk_council_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_-_statement_of_common_ground_with_east_suffolk_council_0.pdf</a>

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<p>Policy ISPA2 – Strategic Infrastructure Priorities</p>	<p>Main issue 7: Not in favour of proposal for an east bank link road and a new A14(T) junction as there is concern with resultant local 'junction hopping' along the A14 which would reduce highway capacity, and more significantly it is considered that there is insufficient geometric capacity to accommodate an additional junction on this section of the A14.</p>	<p>Highways England (Rep ID: 26596)</p>	<p>Noted - The detail of any new or improved junctions on the A14 will be discussed between Suffolk County Council (highway authority) and Highways England at the appropriate juncture. Policy CS20 paragraph 8.251 confirms that the east bank link road and new junction mentioned are not proposed at this time.</p>	
<p>Policy ISPA2 – Strategic Infrastructure Priorities</p>	<p>Main issue 8: We consider that policy ISPA2 should also include delivery of strategic green infrastructure alongside the other types of infrastructure listed.</p>	<p>Suffolk Wildlife Trust (Rep ID: 26321)</p>	<p>Agreed: The SoCG approved with East Suffolk included reference to making appropriate provision for green infrastructure and suitable alternative natural greenspace (SANGS) as a new clause h) to Policy ISPA 2.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_-_statement_of_common_ground_with_east_suffolk_council_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_-_statement_of_common_ground_with_east_suffolk_council_0.pdf</a></p>

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<p>Policy ISPA2 – Strategic Infrastructure Priorities</p>	<p>Main issue 9: Needs to include the highway schemes that SCC assumes will proceed in Ipswich in its ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2 along with the dates they are required by. Without these being implemented the modelling work, and hence the CS is unsound. See 12 highways schemes listed in attached letter.</p>	<p>Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26510)</p>	<p>Disagree for the following reason: The Policy ISPA2 refers to a set of highly strategic infrastructure which related at the level of the ISPA authorities and is determined through the wider Suffolk Growth Partnership Board. This is also the set of strategic infrastructure included in Iteration 6 of the ISPA SoCG and therefore would not be appropriate here. In addition, in Table 8A and 8B where appropriate to an Ipswich context these may also appear.</p>	
<p>Policy ISPA2 – Strategic Infrastructure Priorities</p>	<p>Main issue 10: The list of highway schemes excludes improvements to the Henley Road/Dale Hall Lane junctions with Valley Road which are required to be delivered by Crest Nicholson. Needs to be confirmed whether this infrastructure project has been included and modelled accordingly.</p>	<p>Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26510)</p>	<p>Disagree for the following reason: The Policy ISPA2 refers to a set of highly strategic infrastructure which related at the level of the ISPA authorities and is determined through the wider Suffolk Growth Partnership Board. This is also the set of strategic infrastructure included in Iteration 6 of the ISPA SoCG and therefore would not be appropriate here. In addition, in Table 8A and 8B where appropriate to an Ipswich context these may also appear.</p>	

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Policy ISPA2 – Strategic Infrastructure Priorities	Main issue 11: Support the inclusion of sewage infrastructure in ISPA2.	Save Our Country Spaces (Rep ID: 26403) Northern Fringe Protection Group (Rep ID: 26510)	Noted - no modification required.	
Policy ISPA3 – Cross-boundary Mitigation of Effects on Protected Habitats and Species	Main issue 1: Support commitment to address the issue of recreational impact avoidance and mitigation through continued joint working.	East Suffolk Council (Rep ID: 26391)	Noted - no modification required.	

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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 1: Site should remain as farmland to provide the green trail (as per Policy DM10).</p>	<p>Derk Noske (Rep ID: 26194) Save Our Country Spaces (Rep ID: 26396) Northern Fringe Protection Group (Rep ID: 26516)</p>	<p>Disagree for the following reasons: The Council's vision for housing is primarily led through regeneration of the centre of the town. However, this site is an important strategic site which straddles the border with East Suffolk. It will require land and infrastructure works and green infrastructure (including Suitable Alternative Natural Greenspace) on both sides of the Borough boundary in order to come forward. Development would be planned and delivered comprehensively, and would be master planned jointly with land within East Suffolk Council as identified through the Suffolk Coastal Local Plan. New homes would be limited to south of the railway line and adjacent to the urban area. The design, layout and landscaping of the development should be carefully designed to preserve the setting of the nearby listed buildings. The site development across the boundary will be jointly master planned and incorporates a 'green trail. IBC has worked closely with East Suffolk and the policy relating to the site on both sides of the border closely mirror each other - See SoCG signed and agreed between both locals authorities.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25-statement_of_common_ground_with_east_suffolk_council_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25-statement_of_common_ground_with_east_suffolk_council_0.pdf</a></p>
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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 2: Additional housing would encroach on this pristine countryside that provides easy access to green spaces.</p>	<p>Derk Noske (Rep ID: 26194)</p>	<p>Disagree for the following reasons:  The Council's vision for housing is primarily led through regeneration of the centre of the town. However, this site is an important strategic site which straddles the border with East Suffolk. It will require land and infrastructure works and green infrastructure (including Suitable Alternative Natural Greenspace) on both sides of the Borough boundary in order to come forward. Development would be planned and delivered comprehensively, and would be master planned jointly with land within East Suffolk Council as identified through the Suffolk Coastal Local Plan. New homes would be limited to south of the railway line and adjacent to the urban area. The design, layout and landscaping of the development should be carefully designed to preserve the setting of the nearby listed buildings. The site development across the boundary will be jointly master planned and incorporates a 'green trail. Where housing growth will be significant in one particular location, large scale natural greenspaces are an additional measure, delivered individually within development projects, to provide an alternative to recreation on European sites are referred to as Suitable Alternative Natural Greenspaces (SANGs). This will be the case here. IBC has worked closely with East Suffolk and the policy relating to the site on both</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_statement_of_common_ground_with_east_suffolk_council_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_statement_of_common_ground_with_east_suffolk_council_0.pdf</a></p>
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			sides of the border closely mirror each other - See SoCG signed and agreed between both locals authorities.	
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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 3: Allocation will significantly increase traffic and development should not take place until significant improvements to roads/ travel have been made.</p>	<p>Rushmere St Andrew Parish Council (Rep ID: 26233)          Save Our Country Spaces (Rep ID: 26396)          Northern Fringe Protection Group (Rep ID: 26516)</p>	<p>The site sheet for ISPA4.1 takes account of the requirement for transport improvements and the need for a transport assessment and travel plan will be required to ensure that development contributes towards delivering a significant modal shift to sustainable transport modes. The timing of the improvements will be linked to phasing which in turn will be determined by the joint authority master planning process. The site development is timed in the housing trajectory for Year 12 in the plan period so that the majority of the Ipswich Garden Suburb is completed. Therefore no modification is required to the plan.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ilp_reg_19_site_sheets_ip080_-_ispa_4_1_part_2_clean.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ilp_reg_19_site_sheets_ip080_-_ispa_4_1_part_2_clean.pdf</a></p>
<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 4: The agreement to work with ESC supported. Development near Humber Doucy Lane is within the catchment of Two Rivers Medical Centre and primary care provision would likely be prescribed here</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26207)</p>	<p>Agree for the following reason:          - Policy ISPA4 identifies that infrastructure needs of development will be discussed and agreed as part of the future master planning work. This is also agreed in the CCG, ESNEFT and IBC Statement of Common Ground.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf</a></p>

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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 5: The possibility of issues arising from developments near to local authority boundaries regarding healthcare provision is prevalent. The developments of IGS, continued development of Ravenswood and Whitton are examples of possible cross-boundary developments. Communication/ cooperation will be vital in making sure that appropriate stakeholders are aware and mitigation is sought in a timely manner. Make sure that the land North of Ipswich is accounted for in mitigating health.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26207)</p>	<p>Agree for the following reason: - Policy ISPA4 acknowledges the need to work closely with neighbouring authorities regarding the healthcare needs of any developments close to the boundary of Ipswich Borough Council. The CCG, ESNEFT and IBC Statement of Common Ground acknowledges this with no modification required.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf</a></p>
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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 6: The Rugby Football Club has a need to expand its facilities/ pitches to meet local demand. The potential sale of the existing land could realise the funding to assist the club to meet these demands either through an expansion adjacent to the existing site or an alternative new site. Site IP184b should be included within the ISPA4.1 allocation.</p>	<p>Ipswich Rugby Football Club (Rep ID: 26246)</p>	<p>Disagree for the following reason:  The allocation of site IP184b would be inappropriate as part of this Local Plan Review. The land in question forms part of the Ipswich Rugby Football Club facilities, as well as the access to the larger parcel of the rugby land immediately to the north-east which is within the administrative boundary of East Suffolk Council. The adjoining land has not been allocated through the Suffolk Coastal Local Plan process. Allocating site IP184b would result in a lack of coordination between the two parcels of land and potentially compromise the ability for the rugby use to continue on the adjacent land due to the lack of access.  The nearby cross-border allocation at Humber Doucy Lane (ISPA4.1) has been discussed, consulted upon and progressed through each stage of the Local Plan Review process, in alignment with East Suffolk Council. This is considered to be a more comprehensive and effective means of considering cross-border allocations rather than piecemeal allocations. In addition, there is a lack of detail and certainty at this stage regarding any potential replacement facilities for the Ipswich Rugby Football Club. In light of the above, Ipswich Borough Council considers that any potential development of this site and replacement facilities are instead planned comprehensively</p>	
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			and collaboratively as part of a future Local Plan or Review.	
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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 7: It will be important that the Council can show that the cross-boundary issues concerning the deliverability of those sites in ISPA4 which will meet a considerable portion of the ISPA's housing needs will be addressed by the Council and the relevant agencies.</p>	<p>Home Builder Federation (Rep ID: 26329)</p>	<p>The Council recognises the importance of the deliverability of the land to the north of Humber Doucy Lane and has been working closely with SCC and East Suffolk Council to ensure deliverability. In addition, the site was subject to a Wildlife Audit and this provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless other means of biodiversity enhancement are appropriate. There are rows of Tree Preservation Orders (TPOs) along the boundary with Westerfield House that will need to be preserved unless there are overriding reasons for their removal. The site has also been subject to an HIA and officers are working closely to ensure that the setting of the Grade II listed Westerfield House Hotel (now a care home) is preserved and enhanced as part of the development of the site. The development should also seek to preserve the significance of the Listed Buildings to the north and east of the site. These are Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse. In addition, the purpose of the green trail remains the same as the green rim as described in the adopted Local Plan. The reason for the name change was because it was brought to the attention of officers that the name "green rim" may falsely give the impression that this</p>	
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			<p>land is a de-facto green belt and purely restrictive purpose. The green rim was established as an ecological and recreational/ accessible corridor and was designated as such to ensure that any development incorporates sufficient links to this corridor. The term "green trail" was considered to be a more accurate name for this function. A green trail contribution will be accommodated as part of this proposal and will link to the country park being established as part of the Ipswich Garden Suburb. According to the draft SFRA, (June 2020), the land north of Humber Doucy Lane is not subject to flood risk.</p>	
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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 8: Support principles regarding development of land at Humber Doucy Lane. Approach is complementary of the Suffolk Coastal Final Draft Local Plan and contributes towards the outcome outlined in the Statement of Common Ground of each local planning authority meeting housing need within their own area. Support 30% affordable housing requirement which complements the affordable housing policy in the Suffolk Coastal Final Draft Plan.</p>	<p>East Suffolk Council (Rep ID: 26392)</p>	<p>Noted - no modification required.</p>	
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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 9: Suggest policy for development at northern end of Humber Doucy Lane references maintenance of separation between Ipswich and surrounding settlements, for consistency with DM11. Could provide appropriate level of flexibility by not specifying that SANGs be located on both sides of boundary. Suitable Accessible Natural Greenspaces should be changed to Suitable Alternative Natural Greenspaces.</p>	<p>East Suffolk Council (Rep ID: 26393)</p>	<p>Agreed - included in the agreed joint authority Statement of Common Ground.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25-statement_of_common_ground_with_east_suffolk_council_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25-statement_of_common_ground_with_east_suffolk_council_0.pdf</a></p>
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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 10: KCL has additional land in vicinity so may be possible to locate outside of allocated site. Limiting green infrastructure to within allocation overly restrictive, therefore not effective or sound. Policy outlines affordable housing requirements as much higher than 15% plan requirement. Whilst provision supported in principle, Council must ensure viability. Recommend changes to policy wording to reflect these points.</p>	<p>Kesgrave Covenant (Rep ID: 26440)</p>	<p>It is useful that as the landowner this Representation confirms that additional land may be available for SANGS which will be taken into account with the master plan in form of development. This provides an element of flexibility. However, disagree on the following reasons: The LPA has used the heat map from the whole plan viability to identify high value area major allocations and increased the requirement in those areas. The Whole Plan Viability included examining the Humber Doucy Lane site which it concluded that this site would still make a viability surplus of £27,000 per house after all the policies had been accommodated to deal with any site specific infrastructure required to bring the site forward (p.53). The full appraisal for the site is shown in Appendix 6.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_master_plan_2020-2026.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_master_plan_2020-2026.pdf</a></p>
<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 11: Paragraph 8.28 refers to transport mitigation measures required for the development of the site at Humber Doucy Lane being "challenging". This is not considered to be the case and current reference to "challenging" transport mitigation measures not justified. Recommend amendment to paragraph 8.28.</p>	<p>Kesgrave Covenant (Rep ID: 26441)</p>	<p>Agree - remove the word 'challenging' from para. 8.28.</p>	<p><a href="#">See Policy ISPA4 Cross Boundary Working to Deliver Sites</a></p>

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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 12: The plan identifies requirement for sites to provide 15% affordable housing, with the exception of Humber Doucy Lane and IGS where 30/31% required respectively. Whilst support the provision of affordable housing, more detailed viability testing may be required to ensure site is viable with regard to all infrastructure costs. Recommend amendment to paragraph 8.29 to reflect this.</p>	<p>Kesgrave Covenant (Rep ID: 26442)</p>	<p>Disagree for the following reasons:  The Whole Plan Viability Assessment tested Humber Doucy Lane as part of the assessment of the larger sites in the plan (see page v). Larger sites that are greenfield in the higher value area are more viable than the brownfield sites in the lower value area. Site Ref: ISPA 4.1 – Northern End of Humber Doucy Lane was shown to be viable with the full policy ask. (page viii). It lies within the red higher value zone (para. 5.22 p. 33). The land value used in the assessment is the same used in our generic site testing for greenfield sites in the higher value zone i.e. approximately £100,000 per gross acre (£247,000 per gross hectare). Based on a 60% site coverage (see Table 5-21) this equates £166,667 per net acre (£411,833 per net hectare). Timescales assume two developers onsite selling two market units per month, therefore total build / sale period is 105 months with 12 months lead-in period. The results of our testing shows that the scheme is viable with 30% affordable housing, POLICY DM2: Decentralised renewable or low carbon energy, POLICY DM12: Design and character, POLICY DM1: Sustainable Construction, Policy ISPA3: RAMS, Policy DM8: Biodiversity – maintenance, Policy DM8: Biodiversity – land payment and POLICY DM21: Electric charging points. There is also a viability surplus of £27,000 per unit to deal with any site specific</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_borough_council_wpv_final.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_borough_council_wpv_final.pdf</a></p>
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			infrastructure required to bring the site forward (p.53). The full appraisal for the site is shown in Appendix 6.	
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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 13: Breach of policies DM8, DM10 and DM11 as no net biodiversity gains or green infrastructure through development.</p>	<p>Save Our Country Spaces (Rep ID: 26396) Northern Fringe Protection Group (Rep ID: 26516)</p>	<p>Disagree for the following reasons: The site was subject to a Wildlife Audit and this provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless other means of biodiversity enhancement are appropriate. There are rows of Tree Preservation Orders (TPOs) along the boundary with Westerfield House that will need to be preserved unless there are overriding reasons for their removal. The site has also been subject to an HIA and officers are working closely to ensure that the setting of the Grade II listed Westerfield House Hotel (now a care home) is preserved and enhanced as part of the development of the site. The development should also seek to preserve the significance of the Listed Buildings to the north and east of the site i.e. Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse. The Council recognises the importance of the deliverability of the land to the north of Humber Doucy Lane and has been working closely with SCC and East Suffolk Council to ensure deliverability. In addition, the site was subject to a Wildlife Audit and this provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless</p>	
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			<p>other means of biodiversity enhancement are appropriate. There are rows of Tree Preservation Orders (TPOs) along the boundary with Westerfield House that will need to be preserved unless there are overriding reasons for their removal. The site has also been subject to an HIA and officers are working closely to ensure that the setting of the Grade II listed Westerfield House Hotel (now a care facility) is preserved and enhanced as part of the development of the site. In addition, the purpose of the green trail remains the same as the green rim as described in the adopted Local Plan. The reason for the name change was because it was brought to the attention of officers that the name "green rim" may falsely give the impression that this land is a de-facto green belt and purely restrictive purpose. The green rim was established as an ecological and recreational/ accessible corridor and was designated as such to ensure that any development incorporates sufficient links to this corridor. The term "green trail" was considered to be a more accurate name for this function. A green trail contribution will be accommodated as part of this proposal and will link to the country park being established as part of the Ipswich Garden Suburb.</p>	
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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 14: No development of this land until completion of IGS. Needs to be clarified in the CS.</p>	<p>Save Our Country Spaces (Rep ID: 26396) Northern Fringe Protection Group (Rep ID: 26516)</p>	<p>Disagree for the following reasons: The allocation of land north of Humber Doucy Lane is programmed for Year 12 in the housing trajectory for the plan . This is so that the Ipswich Garden Suburb is substantially complete. This is tied to the development of the East Suffolk element of the site which has been through the Examination process already.</p>	
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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 15: Sustainability Appraisal needs to fully assess implications on building on site and whether delivering more homes in town centre instead of retail is more sustainable option.</p>	<p>Save Our Country Spaces (Rep ID: 26396) Northern Fringe Protection Group (Rep ID: 26516)</p>	<p>Disagree for the following reasons:</p> <ul style="list-style-type: none"> <li>- The Sustainability Appraisal provides a full assessment of the implications of developing the land at Humber Doucy Lane (ISPA4.1).</li> <li>- The Sustainability Appraisal provides an assessment of the different spatial options that the Local Plan Review could consider. Spatial Option 1 has been selected (higher-density urban regeneration) has been selected as the spatial strategy the Council wishes to pursue. However, there is a limited availability of developable land within the Borough and the Council has allocated all the sites that are considered to be suitable and deliverable which do not provide enough houses to meet the objectively assessed housing need. Therefore, the Council has to consider alternative sites that may not meet the spatial option definition but are considered to be potentially sustainable developments to meet the shortfall. A spatial option of changing the use of existing land in the Borough to housing was assessed but scored poorer compared to the preferred spatial option.</li> <li>- The NPPF requires the objectively assessed needs of retail, employment and other needs of the Local Plan Review to be accounted for. The sites that have been allocated for non-residential uses are required to be located at these sites specifically because of the nature of their use (e.g. retail in town centre) and the loss of these non-residential allocations</li> </ul>	
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			<p>would undermine the Local Plan strategy, or, are in inappropriate locations for residential development (e.g. employment sites, lack of local facilities). The Council has for example allocated residential sites on certain car parks that will not be needed to provide the level of car parking as per the Parking Strategy. The Strategic Housing and Economic Land Availability Assessment has assessed potential sites and provides the rationale for why some town centre sites are not suitable, available and/or achievable.</p>	
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Policy ISPA4 – Cross Boundary Working to Deliver Sites	Main issue 16: Adverse impacts and significant disruption will undoubtedly occur in both the short and long term on existing residents	Save Our Country Spaces (Rep ID: 26396)	Disagree for the following reasons: disruption will be controlled through construction plans as part of the development management process.	
Policy ISPA4 – Cross Boundary Working to Deliver Sites	Main issue 17: Portfolio holder (paper E/13/601); “ 2.2 The development of the Northern Fringe involves major challenges due to its largescale, multiple ownership, the need to incorporate a wide range of supporting infrastructure and the mitigation of impacts on local communities.”	Save Our Country Spaces (Rep ID: 26396)	This comment relates to the Ipswich Garden Suburb (IGS) This comment was made about the Ipswich Garden Suburb (IGS)and not land to the north of Humber Doucy Lane. The IGS is subject to three separate parcels of land with separate developers. Permissions have been granted for the Henley Gate and Fonnereau neighbourhoods totalling 1915 homes. In total the site will deliver around 3,500 new homes. Housing Infrastructure Fund was announced in July 2017. Ipswich Borough Council submitted a bid for funding towards three pieces of key infrastructure associated with the Ipswich Garden Suburb; the Country Park and the two Railway Bridges. The Council was successful in its bid for £9,868,351 and has secured the funding with Homes England. In comparison, the land north of Humber Doucy Lane is in one ownership and is a cross-border allocation, with four parcels of land on the Ipswich side forming ISPA4.1 and will deliver an indicative capacity of 496 homes and associated infrastructure.	<a href="https://www.ipswich.gov.uk/content/ipswich-garden-suburb-delivery">https://www.ipswich.gov.uk/content/ipswich-garden-suburb-delivery</a>

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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 18: ISPA4 is unjustified/unsound. Concerns regarding air quality, flood risk vulnerability and biodiversity/habitat loss.</p>	<p>Save Our Country Spaces (Rep ID: 26396)</p>	<p>The site is a cross-boundary strategic allocation straddling the boundary between Ipswich and East Suffolk. A high-quality of design will be required which also respects the countryside setting around the site. Biodiversity will need to be preserved and must incorporate net gain. The Ipswich Wildlife Audit 2019 provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless other means of biodiversity enhancement are appropriate. There are rows of Tree Preservation Orders (TPOs) along the boundary with Westerfield House that will need to be preserved unless there are overriding reasons for their removal. Where possible, existing hedges onto Humber Doucy Lane shall be preserved and protected during the development process as applicable. The layout and design of any future development must incorporate the provision of a Green Trail walking and cycling route to help deliver the wider Green Trail around Ipswich. The provision of Suitable Alternative Natural Green Space and other forms of open space will be required in accordance with the Open Space Standards set out in Appendix 5 of the Core Strategy and Development Management Policies DPD.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ilp_reg_19_site_sheets_ip080_-_ispa_4_1_part_2_clean.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ilp_reg_19_site_sheets_ip080_-_ispa_4_1_part_2_clean.pdf</a></p>
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Policy ISPA4 – Cross Boundary Working to Deliver Sites	Main issue 19: Future households will have to bear costs of management/ maintenance of drainage. Should be levied to new houses.	Save Our Country Spaces (Rep ID: 26396)	Disagree for the following reasons: The site developer will have to pay for any drainage requirements associated with the development and any upgrading of the existing system if there is insufficient capacity and the planning application will require a Drainage Strategy and SuDs as appropriate.	
Policy ISPA4 – Cross Boundary Working to Deliver Sites	Main issue 20: Site no longer needed by Suffolk Coastal Local Plan due to Inspector recommending lower housing target.	Save Our Country Spaces (Rep ID: 26387) Northern Fringe Protection Group (Rep ID: 26512)	Disagree for the following reason: - The adjoining land within the administrative boundary of East Suffolk Council has been retained in the Suffolk Coastal Local Plan as demonstrated in their Main Modifications consultation. The lowering of the housing target due to the use of the 2014 rather than 2016 based household projections has not resulted in this site being removed in the proposed main modifications.	

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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 21: Settlement Sensitivity Assessment recognises the sensitivity of the open land between the edge of suburban Ipswich and villages of Westerfield and Rushmere. Concludes that the area is “sensitive to development” and “care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town”. Site too important/ sensitive to be built on.</p>	<p>Save Our Country Spaces (Rep ID: 26387) Northern Fringe Protection Group (Rep ID: 26512)</p>	<p>Disagree for the following reasons: the site is being master planned along with the adjacent land allocated under the Suffolk Coastal Local Plan Review. The Settlement Sensitivity Assessment identifies opportunities in this area to soften the urban edge of Ipswich, and therefore development would be expected to provide landscaping and open space in the north eastern part of the site which would also act to retain separation and the rural character of the area around Tuddenham Lane to the north. This could also help with the delivery of a ‘green rim’ (now labelled the green trail) around Ipswich, which is a well-established policy within the Ipswich Borough Council Local Plan.</p>	
<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 22: Will need additional primary school, which has traffic implications.</p>	<p>Save Our Country Spaces (Rep ID: 26387) Northern Fringe Protection Group (Rep ID: 26512)</p>	<p>Disagree for the following reasons: Primary school places and early years spaces to cater for demand generated by the cross boundary development but Policy ISPA 4 identifies the likely impacts of the development which would have to be mitigated in relation to demand arising from potential residents such as transport infrastructure and sustainable transport initiatives to create potential for a substantial modal shift change and green infrastructure. As part of the master plan work, mitigation measures required that arise from demand created by the development will</p>	

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			be reconsidered, including possibly the need for healthcare facilities.	
Policy ISPA4 – Cross Boundary Working to Deliver Sites	Main issue 23: There is a lack of a coordinated approach, with allocations proposed within Ipswich. Concerned that spatial strategy has been unduly influenced by the administrative boundary, e.g. SHELAA only looking at sites within IBC.	Bloor Homes (Strutt and Parker) (Rep ID: 26590)	Disagree for the following reasons: - Ipswich Borough Council has demonstrated that it has a sufficient supply of sustainable housing sites over the Local Plan period to meet the objectively assessed housing need. There is not a need for the proposed site to meet this need as proposed by Bloor Homes. The Suffolk Coastal Local Plan Main Modifications consultation does not include the proposed Bloor Homes site. Policy ISPA4 is a cross-boundary site between East Suffolk and Ipswich. The spatial option of delivering housing outside the Borough boundary in locations such as this has been broadly assessed as an option but did not score as highly in the Sustainability Appraisal compared to the preferred spatial option of high-density urban regeneration. This assessment is considered to be robust. In addition, the ISPA Statement of Common	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a21_ispa_statement_of_common_ground_-_v6_june_2020_final.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a21_ispa_statement_of_common_ground_-_v6_june_2020_final.pdf</a>

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			<p>Ground sets out an agreed proposal for dealing with LPA's within ISPA which are not able to accommodate growth within their own administrative boundary. This is laid out in Iteration 6 of the ISPA Statement of Common Ground (pages 8- 13) which clearly sets this approach out.</p>	
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<p>Policy ISPA4 – Cross Boundary Working to Deliver Sites</p>	<p>Main issue 24: The Site has the potential to help meet housing needs within a location (East of Ipswich) which has already been tested through the Suffolk Coastal Local Plan plan-making process and found to be a sustainable location for growth. Do not consider the Site has been robustly assessed, subsequently a sustainable option for growth being rejected without justification. 200 homes (shorter term) and 1,200 homes (medium term).</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26590)</p>	<p>Disagree for the following reasons:  Ipswich Borough Council has demonstrated that it has a sufficient supply of sustainable housing sites over the Local Plan period to meet the objectively assessed housing need. There is not a need for the proposed site to meet this need. The Suffolk Coastal Local Plan Main Modifications consultation does not include the proposed site. As the Inspectors Report has not been published it cannot be confirmed that it has been found to be a sustainable location for growth.  - The spatial option of delivering housing outside the Borough boundary in locations such as this has been broadly assessed as an option but did not score as highly in the Sustainability Appraisal compared to the preferred spatial option of high-density urban regeneration. This assessment is considered to be robust.</p>	
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Policy ISPA4 – Cross Boundary Working to Deliver Sites	Main issue 25: Development must preserve and where possible enhance identified heritage assets and their settings where this setting contributes to significance. Heritage Impact Assessment required. Any specific measures required to remove/ mitigate any harm should be included in a site specific policy for ISPA4.1.	Historic England (Rep ID: 26658)	Agree for the following reasons: Ipswich Borough Council is working with Historic England to resolve the matter via a Statement of Common Ground and the changes therein. Ipswich Borough Council are in the process of commissioning a HIA for Humber Doucy Lane.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf</a>
Policy ISPA4 – Cross Boundary Working to Deliver Sites	Main issue 26: Consider including a local centre at the site.	Suffolk County Council (Rep ID 26579)	Agree for the following reason: Suffolk County Council and Ipswich Borough Council have agreed that paragraph 8.24 should be amended to include the possible need for convenience retail as part of any future master planning. This is reflected in the updated Statement of Common Ground which the two authorities are currently liaising on.	<a href="#">See Policy ISPA4 Cross Boundary Working to Deliver Sites</a>
Policy ISPA4 – Cross Boundary Working to Deliver Sites	Main issue 27: The Council and the relevant agencies need to show that cross-boundary issues concerning the deliverability of those sites in ISPA4 will be addressed.	Home Builder Federation (Rep ID: 26329)	Disagree for the following reasons: The Council are working closely with Suffolk County Council; the ISPA authorities in particular East Suffolk to ensure that the cross-boundary allocation ISPA4.1 (on the Ipswich side ) is capable of being delivered. The site owner is actively promoting the site through the emerging local plan.	

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Policy ISPA4 – Cross Boundary Working to Deliver Sites	Main issue 28: Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), with suggested alternative reference to allocation of land west of Tuddenham Road, north of Millennium Cemetery (500 dwellings).	Ipswich School (Rep ID: 26629)	Disagree for the following reasons: The site to the north of Humber Doucy Lane is a cross-boundary site important for the strategic land supply. The alternative site suggested forms a site for the alternative playing pitches arising from the IGS allocations.	
Policy CS1 – Sustainable Development	Main issue 1: Support paragraph 8.41. 8.44 should reference fluvial flood risk. The SFRA should be updated when new modelling becomes available.	Environment Agency (Rep ID: 26275)	Agreed: This forms part of the jointly signed SoCG between the EA and IBC.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a19_-_environment_agency_signed_statement_of_common_ground.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a19_-_environment_agency_signed_statement_of_common_ground.pdf</a>
Policy CS1 – Sustainable Development	Main issue 2: Policy not required. Duplicates national policy.	Home Builders Federation (Rep ID: 26304)	Disagree for the following reason: Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. CS1 sets the strategic context for the Plan's approach to tackling climate change and explains detailed policies of the plan which take forward the various elements of the approach to climate change. Therefore the policy remains relevant.	

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Policy CS1 – Sustainable Development	Main issue 3: Need to re-write Policy to be compliant with UK Government policy on climate change. Net zero by 2050 is an objective above the NPPF. All development in Ipswich must be at or close to net zero by 2036 otherwise the 2050 target cannot be achieved.	Councillor Oliver Holmes (Rep ID: 26620)	Disagree for the following reason: this policy sets the strategic context for the detailed policies of the plan which take forward the various elements of the plan's approach to climate change, such as DM1 Sustainable Construction and DM2 Decentralised Renewable or Low Carbon Energy.	
Policy CS1 – Sustainable Development	Main issue 4: Sustainable Development needs to reflect the legal requirement to comply with Air Quality targets, as well as considering them elsewhere in the CS for the CS to be sound.	Northern Fringe Protection Group (Rep ID: 26525) Save Our Country Spaces (Rep ID: 26356)	Disagree for the following reason: this policy sets the strategic context for the detailed policies of the plan which take forward the various elements of the plan's approach to climate change. For air quality, Objective 5 and policy DM3 set out the Local Plan approach.	

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Policy CS1 – Sustainable Development	Main issue 5: Needs to reference/ consider Climate Emergency Declaration and Heathrow Judgement.	Northern Fringe Protection Group (Rep ID: 26525) Save Our Country Spaces (Rep ID: 26356)	Disagree for the following reason: The vision and objectives of the Local Plan Review are considered to reflect the wider Climate Emergency Declaration that Ipswich Borough Council has made and it is not necessary to explicitly reference this. The spatial option and strategy presented align with the Climate Emergency Declaration. The Heathrow Judgement is only material to national policy decisions such as NPSs and not local plans.	
Policy CS1 – Sustainable Development	Main issue 6: Need local approach to how development proposals will be considered against the presumption in favour.	Gladman Homes (Rep ID: 26366)	Disagree for the following reason: The strategic policies of the plan set out the scale of growth and spatial strategy, and the development management policies set out the approach to considering development proposals. These, together, show how development proposals will be considered in the context of the NPPF presumption in favour of sustainable development.	
Policy CS1 – Sustainable Development	Main issue 7: CS1 is not consistent with the National Policy and should be removed. Persimmon Homes also endorse representation submitted by HBF.	Persimmon Homes (Rep ID: 26369)	Disagree for the following reason: The policy was revised after preferred options stage to reflect updated Government guidance. This policy and its supporting text are considered valuable in setting the context for the Local Plan approach to climate change and sustainable development through its more detailed policies.	

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<p>Policy CS2 – The Location and Nature of Development</p>	<p>Main issue 1: Designing developments in such a way that encourages the use of more sustainable modes of transport to get to community infrastructure is welcome and will help in the NHS preventative aspirations being obtained.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26208)</p>	<p>Agree - This is the approach taken in Policy CS2</p>	
<p>Policy CS2 – The Location and Nature of Development</p>	<p>Main issue 2: Limiting green infrastructure to the application site is overly restrictive. KCL has additional land in the vicinity of the Humber Doucy Lane site allocation so it may be possible to locate green infrastructure uses outside the site. Therefore, seek flexibility to policy wording to ensure the most appropriate option can be pursued.</p>	<p>Kesgrave Covenant (Rep ID: 26448)</p>	<p>Disagree for the following reasons: Biodiversity will need to be preserved and must incorporate net gain. The Ipswich Wildlife Audit 2019 provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless other means of biodiversity enhancement are appropriate. There are rows of Tree Preservation Orders (TPOs) along the boundary with Westerfield House that will need to be preserved unless there are overriding reasons for their removal. Where possible, existing hedges onto Humber Doucy Lane shall be preserved and protected during the development process as applicable. The layout and design of any future development must incorporate the provision of a Green Trail walking and cycling route to help deliver the wider Green Trail around Ipswich. The provision of Suitable Alternative</p>	

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			<p>Natural Green Space and other forms of open space will be required in accordance with the Open Space Standards set out in Appendix 5 of the Core Strategy and Development Management Policies DPD. It is useful that the landowner has additional land in the vicinity of the site . However, the site is planned in the housing trajectory to come forward in the back end of the plan period and prior to this will be the subject of joint master planning. It is at this stage that such things can be considered in detail.</p>	
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<p>Policy CS2 – The Location and Nature of Development</p>	<p>Main issue 3: Plan should be specific about any infrastructure requirements that will influence timescales of delivery and should not make generic references to the site coming forward "as development draws to a conclusion at Ipswich Garden Suburb" without providing appropriate evidence and details. Recommend amendment to paragraph 8.55 wording to reflect this.</p>	<p>Kesgrave Covenant (Rep ID: 26451)</p>	<p>Disagree for the following reasons: The development site ISPA4.1 , land to the north of Humber Doucy Lane is programmed in the housing trajectory for Year 12 which is towards the back end of the plan period. This is to ensure that the Ipswich Garden Suburb is largely completed. This wording and the timing of development was agreed with East Suffolk so that the cross-boundary sites in both local plans are appropriately phased together. This work is to form part of the joint master planning for the sites.</p>	
<p>Policy CS2 – The Location and Nature of Development</p>	<p>Main issue 4: ABP's vision for the site does not envisage 'high density' development as currently defined in Policy DM23. Request additional wording in the final paragraph of Policy CS2: "...and low elsewhere, unless otherwise agreed through masterplans and provided that in all areas it does not compromise heritage assets..."or wording of similar effect.</p>	<p>Associated British Ports (Rep ID: 26468)</p>	<p>Disagree for the following reasons: The Plan needs to take a consistent approach to density and the efficient use of land. In addition, this is a key site for the longer term housing land supply. DM23 allows for exceptions which could facilitate appropriate variation from the density prescribed at this exceptional site. The density proposed for the 70% of the site that is planned to be developed is 100dph which is consistent with other similar sites. Therefore no amendment to CS2 is needed. There are elements of the site that can be developed at a higher density than other elements e.g. the eastern boundary where there is higher rise development adjacent to the boundary.</p>	

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Policy CS2 – The Location and Nature of Development	Main issue 5: General support for Policy CS2. Welcome changes to criterion h, which is now consistent with the guidance set out in the NPPF.	Cardinal Lofts (Mill Ltd) (Rep ID: 26554)	Noted - no modification required.	
Policy CS2 – The Location and Nature of Development	Main issue 6: Level of town centre retail development isn't required, land better used for new homes.	Save Our Country Spaces (Rep ID: 26389) Northern Fringe Protection Group (Rep ID: 26514)	Disagree for the following reason: - The NPPF requires plan making authorities to look ahead over at least the next 10 years in evaluating retail needs. The 2017 Retail and Commercial Leisure Study originally identified this need as being circa 20,000sqm net comparison floorspace. The Council then commissioned a Retail Position Update Statement (August 2019) to take account of more recent evidence which demonstrated a lower need of approximately 10,000 sqm net of comparison floorspace. This updated requirement is based on the most up to date evidence base and is considered to be robust. Therefore re-allocating the identified retail allocations to housing would compromise the ability to deliver this.	

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<p>Policy CS2 – The Location and Nature of Development</p>	<p>Main issue 7: Town centre housing has lower impact on traffic congestion and air quality than outskirt development. Opportunities to convert existing excess town centre retail into housing. This approach should be used instead of Humber Doucy Lane, which will exacerbate traffic congestion into town centre and along Valley/Rd/Colchester Rd.</p>	<p>Save Our Country Spaces (Rep ID: 26389) Northern Fringe Protection Group (Rep ID: 26514)</p>	<p>Disagree for the following reasons: It is agreed that town centre housing is preferential from a sustainable development perspective. This is reflected in the Council's preferred Spatial Option and Strategy for growth in the Sustainability Appraisal. The Sustainability Appraisal did also assess changing the use of existing land in the Borough to housing as a spatial option in of itself. However, this was rejected because it performed more poorly than the preferred spatial option in terms of impacts on poverty and exclusion, air quality, town centres, transport and movement etc. However, the Council has exhausted the deliverable sites within the town centre and therefore the Humber Doucy Lane (ISPA4.1) is required to help meet the identified objectively assessed housing need. Any empty retail units within the town centre need to remain available for retail/ town centre use to take account of the usual "churn" in turnover of these units and provide a range of flexible unit types, sizes and locations to serve potential occupants and allow the town centre to respond to changes in the market.</p>	
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<p>Policy CS2 – The Location and Nature of Development</p>	<p>Main issue 8: Ipswich Central supports increase in town centre homes. Will improve town centre and night-time economy, reduce traffic into the centre, facilitate modal shift and improve air quality.</p>	<p>Save Our Country Spaces (Rep ID: 26389) Northern Fringe Protection Group (Rep ID: 26514)</p>	<p>Agree - This is the spatial option chosen for the Ipswich Local Plan Review.</p>	
<p>Policy CS2 – The Location and Nature of Development</p>	<p>Main issue 9: Parking Strategy over-estimates parking demand, brownfield parking land better for housing.</p>	<p>Save Our Country Spaces (Rep ID: 26389) Northern Fringe Protection Group (Rep ID: 26514)</p>	<p>Disagree for the following reason: The Parking Strategy is deemed to be a thorough assessment of parking demand and supply in the Borough. The Council has allocated parking land for residential development in the Local Plan Review that is deliverable (suitable, available and achievable) and is not required to deliver the parking strategy.</p>	
<p>Policy CS2 – The Location and Nature of Development</p>	<p>Main issue 10: Support the content of the policy itself but land North of Burrell Road should be allocated for residential development to help achieve the aims of this policy.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26647)</p>	<p>Disagree for the following reasons: The principle of a residential development at the proposed site is acceptable, however, it has not been the subject to the same assessments as other site allocations e.g. SFRA and SA, or public consultation as a standard part of plan making and so it would be inappropriate to include it at this time. This site only came forward at Regulation 19 stage. The Council has identified a deliverable supply of residential sites and demonstrated that it can</p>	

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			meet its housing need over the Local Plan period. The site would instead likely form part of the Council's windfall which is accounted for in the housing supply.	
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<p>Policy CS2 – The Location and Nature of Development</p>	<p>Main issue 11: Concerned that 'higher density homes' is a synonym for tall buildings/ flats. Appears to be confirmed in final paragraph of Policy. Inference that 'high density' could 'compromise' the historic character of Ipswich, by way of tall buildings affecting the setting of these assets, impacting on their significance. Consider this section on densities needs to be clarified, and 'high', 'medium' and 'low' densities defined. Should also make clear that good design should not only respect the historic character of an area, but respond to it. High density does not need to take the form of flats, see 'Increasing Residential Density publication (2018).</p>	<p>Historic England (Rep ID: 26655)</p>	<p>Agree for the following reasons: Ipswich Borough Council is working with Historic England to resolve the matter via a Statement of Common Ground and the changes therein. The Council have committed to making amendments to Policy CS2 to strengthen the wording on the historic environment and clarify the section on densities.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27_-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27_-draft_statement_of_common_ground_he_0.pdf</a></p>
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<p>Policy CS2 – The Location and Nature of Development</p>	<p>Main issue 12: The Council's housing sites are undeliverable or in the flood zone. Therefore, sites outside the boundary need to be identified. Gladman proposes two sites in East Suffolk and Babergh.</p>	<p>Gladman Homes (Rep ID: 26375)</p>	<p>Disagree for the following reasons: The Council considers that the housing sites included in the Local Plan Review are deliverable. The sites have also been the subject of a Strategic Flood Risk Assessment and the results of this have not ruled out the Council's housing sites that are at risk of flooding. The Council has followed the sequential approach to site selection and any sites that are at risk of flooding can be developed to overcome any flood risk constraints in principle. - The two sites presented would not align with the Council's preferred approach to spatial development set out in the Sustainability Appraisal which is one of high-density urban regeneration. The sites presented are more akin to spatial option 2 assessed in the Sustainability Appraisal which was rejected on the grounds that it performed more poorly than the preferred spatial option and would not constitute sustainable development.</p>	
<p>Policy CS2 – The Location and Nature of Development</p>	<p>Main issue 13: A prescriptive approach in the interpretation of the policy would limit opportunities to respond to market forces. Persimmon also endorse the statement made by the HBF.</p>	<p>Persimmon Homes (Rep ID: 26425)</p>	<p>Disagree for the following reasons: The policy sets out the spatial strategy for the development and use of land, in accordance with the NPPF. It is given effect by more detailed policies, such as development management policy DM23 on housing density, which have an element of flexibility built into them where appropriate. In addition, the plan has been subject to whole plan viability</p>	

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			assessment which shows that the policies are deliverable.	
Policy CS2 – The Location and Nature of Development	Main issue 14: Object to soundness. BMS consider statements made in the plan to the effect that later in the plan period housing supply opportunities in Ipswich will be limited, are premature and shouldn't be made until a comprehensive regeneration and assets strategy has been undertaken. Ipswich should look at its car parks and should have developed its car parking strategy before asserting that housing land supply opportunities are likely to be limited.	Babergh and Mid Suffolk (Rep ID: 26450)	IBC are seeking to address this matter via the currently draft SoCG with Babergh and Mid Suffolk district councils.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a26_-_draft_statement_of_common_ground_with_bmsdc.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a26_-_draft_statement_of_common_ground_with_bmsdc.pdf</a>

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<p>Policy CS2 – The Location and Nature of Development</p>	<p>Main issue 15: Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), under CS2(b), suggest alternative reference to allocation of land off Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings).</p>	<p>Ipswich School (Rep ID: 26623)</p>	<p>Disagree for the following reasons: the proposed allocation the objector promotes is needed to provide replacement sports facilities for the existing sports facilities land allocated for housing and associated infrastructure at IGS (policy CS10) and therefore the sports allocation needs to be retained.</p>	
<p>Policy CS3 – IP-One Area Action Plan</p>	<p>Main issue 1: Support regeneration objectives for IP-One area in general. However, request addition of a new criterion into any new policy based on Policy CS3: “New development should be sensitive to existing uses (including those at the Port of Ipswich) and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.” Support the inclusion of similar wording to this effect in Policy CS13.</p>	<p>Associated British Ports (Rep ID: 26469)</p>	<p>Support for the Final Draft Ipswich Local Plan's regeneration objectives is noted. However, Ipswich Port is referenced at various points within the Local Plan. As the Port lies primarily outside the IP-One area, text has been added to policy CS13 Planning for Jobs Growth, rather than to CS3 IP-One Area Action Plan to the final draft Local Plan to read in CS13 CRITERIA B: 'protecting land for employment uses in existing employment areas defined on the policies map, including the function and strategic role of the port to Ipswich; The amenity policy DM18 also delivers the protection that ABP wish to see of existing operations from potentially conflicting new development.</p>	

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<p>Policy CS3 – IP-One Area Action Plan</p>	<p>Main issue 2: General support for Policy. Welcome change made to criterion c and the explicit recognition that guidance set out in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft may not always be the optimum way to develop a site.</p>	<p>Cardinal Lofts (Mill Ltd) (Rep ID: 26555)</p>	<p>Noted - no modification required.</p>	
<p>Policy CS3 – IP-One Area Action Plan</p>	<p>Main issue 3: Action plan fails to make the most of allocating previously developed land. A greater number of small to medium scales deliverable sites are required to make the plan sound. Land North of Burrell Road is suitable for a residential allocation.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26648)</p>	<p>Disagree for the following reasons: Many of the sites allocated within the IP-One area are on previously developed land and Policy CS2 makes reference to maximising the use of previously developed land by providing appropriate development densities. The principle of a residential development at the proposed site is acceptable, however, it has not been the subject to the same assessments as other site allocations e.g. SFRA and SA, or public consultation as a standard part of plan making and so it would be inappropriate to include it at this time. This site only came forward at Regulation 19 stage. The Council has identified a deliverable supply of residential sites and demonstrated that it can meet its housing need over the Local Plan period. The site would instead likely form part</p>	

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			of the Council's windfall which is accounted for in the housing supply.	
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<p>Policy CS3 – IP-One Area Action Plan</p>	<p>Main issue 4: Extremely concerned about the following key aspects:</p> <ol style="list-style-type: none"> <li>1. The lack of clarity regarding the status of the IP-One Area Action Plan;</li> <li>2. The lack of clear delineation of the opportunity areas; and</li> <li>3. The absence of robust policies for these which in our view renders this aspect of the Plan not effective, and therefore unsound.</li> </ol> <p>See detailed commentary for further explanation of these concerns. Ipswich has a high number of historic assets in the IP-One area and appropriate management of the historic environment will therefore be a significant consideration in the design and deliverability of new development.</p>	<p>Historic England (Rep ID: 26657)</p>	<p>Agreed: Following a meeting with Historic England on the matter it was apparent that the objection was not to the principal and all the work required was in the emerging plan. There does however need to be more clarity and a 'golden thread' through from the Strategic Policies to Site Allocations and the Opportunity Areas. The Opportunity Areas require a vision for what they were designed to achieve and a summary of the character of each Opportunity Area to explain what makes that area unique. In addition, an additional plan of the Opportunity Areas will be inserted to clarify the link between the Site Allocations and Opportunity Areas. This is being addressed through the draft Statement of Common Ground.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf</a></p>
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<p>Policy CS3 – IP-One Area Action Plan</p>	<p>Main issue 5: The way the IP-one area action plan is referred to suggests that this work has yet to be completed, and that in due course a new Area Action Plan will be prepared, clarifying the opportunity area boundaries, and setting out detailed policy criteria. However, this is not clear and is confusing and misleading. Concern is that the Plan should be readable and useable for everyone. If the IP-One Area Action Plan has been completed and is incorporated, then Policy and supporting text need to clearly state this. Notwithstanding this, it is our contention that the Council has not followed CS3.</p>	<p>Historic England (Rep ID: 26660)</p>	<p>Agreed: The IP-One Area Action Plan was originally intended to be a standalone document, however as the spatial strategy for Ipswich focuses development to such a significant degree on central Ipswich and in particular the IP-One Area, the Council made the decision to incorporate the IP-One Area Action Plan into the Site Allocations and Policies Development Plan Document. Ipswich Borough Council agree that the evolution of the IP-One Area Action Plan has contributed to confusion over its status and that policy CS3 and the supporting text would benefit from clarification. The detailed wording is being addressed through the draft Statement of Common Ground with Historic England.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf</a></p>
<p>Policy CS4 – Protecting our Assets</p>	<p>Main issue 1: The amendment to bullet point H of the policy is supported.</p>	<p>AONB Unit (Rep ID: 26252)</p>	<p>Noted - no modification required.</p>	

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Policy CS4 – Protecting our Assets	Main issue 2: Ensure correct terminology with reference to the draft South East Marine Plan and The East Inshore and East Offshore Marine Plans.	Marine Management Organisation (Rep ID: 26548)	Agree for the following reasons: The Local Plan must use the correct terminology when referring to other policy documents both adopted and emerging . This will involve minor modification to Diagram 1; paragraph 8.78 and 8.81 references.	<a href="#">See Minor changes Reg 19 to Reg 22</a>
Policy CS4 – Protecting our Assets	Main issue 3: Existing green rim is an asset and should be protected by adding it to CS4, especially as IBC have previously massively reduced its size and are now attempting to reclassify it and destroy it.	Save Our Country Spaces (Rep ID: 26399) Northern Fringe Protection Group (Rep ID: 26518)	Disagree for the following reasons: The purpose of the green trail remains the same as the green rim as described in the adopted Local Plan. The reason for the name change was because it was brought to the attention of officers that the name "green rim" may falsely give the impression that this land is a de-facto green belt and purely restrictive in purpose. The green rim was established as a green infrastructure concept as an ecological and recreational/ accessible corridor and was designated as such to ensure that any development incorporates sufficient links to this corridor. The term "green trail" was considered to be a more accurate name which encompasses both the biodiversity and active travel functions. It is felt that as a form of green infrastructure that the strategic nature of it fits in better with Policy CS16 rather than CS4.	

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Policy CS4 – Protecting our Assets	Main issue 4: Welcome the changes to criterion 3 regarding the Council's commitment to a local list in policy.	Historic England (Rep ID: 26666)	Noted - no modification required.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf</a>
Policy CS5 – Improving Accessibility	Main issue 1: The accessibility of infrastructure is a key factor in designing a development that is aimed at meeting environmental and health objectives. Despite the desire to have all community infrastructure within easily accessible locations, it might not always be possible for health but this does not mean that community space could not be accessible to provide community healthcare services on an ad hoc basis.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26209)	Noted - It has been agreed through the draft CCG, ESNEFT and IBC Statement of Common Ground that all parties agree to work together and with other relevant stakeholders to address healthcare needs for new developments on a case by case basis. This could be through S106 negotiations and/or on-site delivery of new facilities where feasible. IBC acknowledges that the Ipswich and East One Public Estate (OPE) platform is being developed and that an estate strategy for Ipswich is being prepared. Both parties agree to collaborate on the outcomes of this estate strategy in consultation with other relevant stakeholders as to how underutilised public buildings may be used for health facilities.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23-draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23-draft_statement_of_common_ground_with_ccg_esneft.pdf</a>
Policy CS5 – Improving Accessibility	Main issue 2: Support Policy and agree that inclusive transport infrastructure should be a priority.	Network Rail (Rep ID: 26545)	Noted - no modification required.	

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<p>Policy CS5 – Improving Accessibility</p>	<p>Main issue 3: Disappointed that only the Town Centre is specifically mentioned as being a location dependent upon access by a variety of transport modes. This 'recognition' should be expanded to include the whole of the IP-One Area.</p>	<p>Cardinal Lofts (Mill Ltd) (Rep ID: 26556)</p>	<p>Disagree for the following reason: the reference in policy CS5 reflects the town centre's sub-regional role for commerce, public administration, shopping, higher and further education and culture, and the fact that it is arterial routes into the centre that tend to experience the highest level of congestion. Therefore the approach to car parking provision in the town centre requires particular consideration.</p>	
<p>Policy CS5 – Improving Accessibility</p>	<p>Main issue 4: Must bear in mind that the vast majority of journeys into and through Ipswich are by car and there is no objective for limiting or reducing car transport. It is entirely likely that accessibility will decrease over the plan period.</p>	<p>Councillor Oliver Holmes (Rep ID: 26621)</p>	<p>Disagree for the following reason: Objective 6 of the plan relates to improving accessibility and achieving modal shift. Modal shift is about carrots as well as sticks. Work is underway on the development of an action plan to support the County's ISPA Transport Mitigation Strategy, and the preparation of a Local Cycling and Walking Infrastructure Plan (LCWIP). These aim to make walking, cycling and public transport use more attractive in Ipswich, e.g. through Quality Bus Partnerships and cycling infrastructure improvements. At the Suffolk County Council cabinet meeting on the 16 June 2020, a recommendation was endorsed to develop the LCWIP for the Ipswich area. The link to the cabinet page is here <a href="https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(16-06-2020),%20The%20Cabinet">https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(16-06-2020),%20The%20Cabinet</a></p>	

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<p>Policy CS5 – Improving Accessibility</p>	<p>Main issue 5: IBC is failing to Improve Access in breach of CS5. More needs to be done otherwise Modal Switch assumptions too high and unsound. CS is not justified with respect to Improving Access and Transport</p>	<p>Save Our Country Spaces (Rep ID: 26364) Northern Fringe Protection Group (Rep ID: 26531)</p>	<p>Disagree for the following reasons: Action is in hand to encourage people to switch transport modes, for example through the development of the action plan to support the County's ISPA Transport Mitigation Strategy, and the preparation of a Local Cycling and Walking Infrastructure Plan (LCWIP). These aim to make walking, cycling and public transport use more attractive in Ipswich, e.g. through Quality Bus Partnerships and cycling infrastructure improvements. Mitigation of the transport issues within Ipswich has been identified through the ISPA Transport Mitigation Strategy as delivering modal shift in the order of 7% for new development and 9% for existing trips. The Strategy (Core Document reference D39) explains how the figures have been arrived at by the County Council.</p>	
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<p>Policy CS5 – Improving Accessibility</p>	<p>Main issue 6: Concerned that our comments on CS5 and CS20 in relation to the transport modelling and modal shift (and associated air quality issues) have not been adequately considered.</p>	<p>Save Our Country Spaces (Rep ID: 26364) Northern Fringe Protection Group (Rep ID: 26531)</p>	<p>Disagree for the following reasons: Action is in hand to encourage people to switch transport modes. Work is underway on the development of an action plan to support the County's ISPA Transport Mitigation Strategy, and the preparation of a Local Cycling and Walking Infrastructure Plan (LCWIP). These aim to make walking, cycling and public transport use more attractive in Ipswich, e.g. through Quality Bus Partnerships and cycling infrastructure improvements. The ISPA Transport Mitigation Strategy will inform an implementation programme of measures that will support local plans by delivering modal shift in Ipswich. In relation to the LCWIP, the Suffolk County Council cabinet meeting on the 16 June 2020 endorsed a recommendation to develop the LCWIP for the Ipswich area. There are bidding opportunities available for cycling and walking improvements arising from Government funding pots which could support the implementation of measures identified through the LCWIP.</p>	
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Policy CS5 – Improving Accessibility	Main issue 7: Disappointing that the Transport Mitigation Strategy and other relevant modal shift documents have not been included in the Evidence Base.	Save Our Country Spaces (Rep ID: 26364) Northern Fringe Protection Group (Rep ID: 26531)	Noted: The Suffolk County Council ISPA Transport Mitigation Strategy for the Ipswich Strategic Planning Area (August 2019) has now been uploaded as part of the Core Document Library on the Council's website to reflect this (reference D39).	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/2019-08.ispa_mitigation_strategy.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/2019-08.ispa_mitigation_strategy.pdf</a>
Policy CS5 – Improving Accessibility	Main issue 8: New infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary.	Save Our Country Spaces (Rep ID: 26364) Northern Fringe Protection Group (Rep ID: 26531)	Disagree for the following reason: The transport infrastructure needed is identified through table 8A of the Core Strategy which recognises that a range of measures from sustainable transport measures to A1214 Colchester Road improvements will be needed to meet the transport challenges posed by planned growth.	
Policy CS5 – Improving Accessibility	Main issue 9: Bus routes just go into town rather than radial. Investment in bus network required.	Save Our Country Spaces (Rep ID: 26364) Northern Fringe Protection Group (Rep ID: 26531)	The SCC ISPA Transport Mitigation Strategy (Core Document reference D39) identifies priorities for bus route reviews in paragraph 5.9.6, based on levels of demand and this could be taken forward through a bus service improvement plan. The action plan for the strategy is currently in preparation.	

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<p>Policy CS5 – Improving Accessibility</p>	<p>Main issue 10: No money allocated over four-year period to improving air quality, delivering modal shift or improving cycle/ pedestrian infrastructure.</p>	<p>Save Our Country Spaces (Rep ID: 26364) Northern Fringe Protection Group (Rep ID: 26531)</p>	<p>Disagree for the following reasons: After the adoption of the Cycling SPD in 2016, external funding opportunities for implementation were limited. This situation has now changed with funding pots such as the emergency active travel fund announced by the Government in May 2020, which is £45m nationally. Action has been undertaken on air quality through the Air Quality Action Plan, for example the Council has replaced its diesel pool-car fleet with electric vehicles. Traffic flow issues are the responsibility of the Highway Authority which recently completed works under the Travel Ipswich banner. This included measures such as urban traffic management and control systems and real time bus information. The county council and ISPA authorities are now leading work to develop an action plan for the ISPA Transport Mitigation Strategy.</p>	
<p>Policy CS7 – The Amount of Housing Required</p>	<p>Main issue 1: Shortfall of 796 units requires clarification. Presumably as a result of housing supply period being reduce from 2018 to 2019-2036?</p>	<p>Constable Homes (Tom Cole) (Rep ID: 26298)</p>	<p>Disagree for the following reasons: There is no shortfall in the supply. Table 4 is intended to show the mix of greenfield land and previously developed land in the housing land supply. Table 3 shows the calculation for the new supply needed (6,100 dwellings) after taking into account completions 2018-2019 and at 1st April 2019, dwellings under construction and dwellings with planning permission or a resolution to grant it.</p>	

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Policy CS7 – The Amount of Housing Required	Main issue 2: Ipswich has poor housing delivery (see housing delivery test results) and will need to accelerate delivery to overcome significant shortfall.	Constable Homes (Tom Cole) (Rep ID: 26298)	Disagree for the following reasons: Ipswich has been identified as underdelivering through the last two rounds of the Housing Delivery Test (HDT). In response to the first HDT results, the Council published a Housing Delivery Action Plan in August 2019. A review for 2020 was published to meet the Government's deadline. However, completions were substantially increased during 2019-20 at 421 dwellings, compared with 223 dwellings 2018-2019. The Council is also delivering directly through its own council house building programme. More information is set out in the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf</a>
Policy CS7 – The Amount of Housing Required	Main issue 3: 20% buffer to five year housing supply should be applied as no buffer applied to CS7.	Constable Homes (Tom Cole) (Rep ID: 26300)	Disagree for the following reason: the Council's five year housing land supply is currently subject to a 20% buffer and this is set out in the Housing Topic Paper and addendum, Core Document reference D52. It is not appropriate to add a 20% buffer to the whole plan requirement set out in policy CS7.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf</a>
Policy CS7 – The Amount of Housing Required	Main issue 4: To be effective, a buffer equivalent to one year's supply (445 dwellings) should be added to five year housing land supply as the Housing Delivery Test requirement will increase to 75% as of February 2021.	Constable Homes (Tom Cole) (Rep ID: 26300)	Disagree for the following reason: The Council's five year housing land supply is currently subject to a 20% buffer and this is set out in the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf</a>

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Policy CS7 – The Amount of Housing Required	Main issue 5: Critical position of acute undersupply of housing. Current approach will mean an immediate review of Plan necessary.	Constable Homes (Tom Cole) (Rep ID: 26300)	Disagree for the following reason: Delivery dipped 2017-2019, but 2019-20 has seen activity bounce back to a completions level of 421 dwellings. Over the next five year period, delivery will begin at the Ipswich Garden Suburb which will help to diversify the source of completions. The Council has identified a robust five year housing land supply, as set out in the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document Reference D52.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf</a>
Policy CS7 – The Amount of Housing Required	Main issue 6: The Council's desire for jobs and economic growth is not matched by the Council's decision to adopt a lower housing requirement.	Home Builders Federation (Rep ID: 26323) Gladman Homes (Rep ID: 26406)	Disagree for the following reason: the housing requirement and jobs target are evidence based figures as set out in the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52, and the Economy Topic Paper reference D55.	
Policy CS7 – The Amount of Housing Required	Main issue 7: The Council will not meet its need for affordable housing.	Home Builders Federation (Rep ID: 26323) Gladman Homes (Rep ID: 26406)	Disagree for the following reason: Affordable housing is addressed through the Affordable Housing Topic Paper, Core Document reference D53. The Local Plan sits alongside a proactive Council building programme which is already delivering affordable homes. In addition to this, the Council is in the early stages of engaging with Homes England regarding site delivery, and also preparing to assist the burden for private developers in arranging to take on the delivery and	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d53_-_affordable_housing_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d53_-_affordable_housing_topic_paper_june_2020.pdf</a>

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			management of affordable rented properties on their behalf, as a Registered Provider.	
Policy CS7 – The Amount of Housing Required	Main issue 8: Do not agree with the steps proposed. The approach is not sufficiently challenging and is likely to lead to the whole plan underdelivering.	Home Builders Federation (Rep ID: 26323) Gladman Homes (Rep ID: 26406)	Disagree for the following reason: the stepping set out in policy CS7 ties in with the expected delivery of homes at Ipswich Garden Suburb. It is therefore justified and evidence based. A housing trajectory is included in the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf</a>
Policy CS7 – The Amount of Housing Required	Main issue 9: It is not evident which sites form the basis of supply within the first five years of the plan. It will be necessary for the Council to provide a detailed site by site assessment of delivery across the plan period.	Home Builders Federation (Rep ID: 26323) Gladman Homes (Rep ID: 26406)	Disagree for the following reasons: A detailed housing trajectory is provided as part of the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52. The topic paper also sets out the five year housing land supply calculation.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf</a>

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<p>Policy CS7 – The Amount of Housing Required</p>	<p>Main issue 10: Plan should be specific about any infrastructure requirements that will influence timescales of delivery and should not make generic references to the site coming forward "as development draws to a conclusion at Ipswich Garden Suburb" without providing appropriate evidence and details. Recommend amendment to policy wording to reflect this.</p>	<p>Kesgrave Covenant (Rep ID: 26452)</p>	<p>Disagree for the following reasons: The development site ISPA4.1 , land to the north of Humber Doucy Lane is programmed in the housing trajectory for Year 12 which is towards the back end of the plan period. This is to ensure that the Ipswich Garden Suburb is largely completed. This wording and the timing of development was agreed with East Suffolk so that the cross-boundary sites in both local plans are appropriately phased together. This work is to form part of the joint master planning for the sites.</p>	
<p>Policy CS7 – The Amount of Housing Required</p>	<p>Main issue 11: No housing trajectory and the rate of delivery unknown. This is a significant failure.</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26582)</p>	<p>Disagree for the following reasons: A detailed housing trajectory is provided as part of the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52. The topic paper also sets out the five year housing land supply calculation.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf</a></p>

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<p>Policy CS7 – The Amount of Housing Required</p>	<p>Main issue 12: The Site can deliver a smaller scale housing development of around 200 homes within the early Plan period.</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26582)</p>	<p>Disagree for the following reasons: There is no shortfall in the supply, as illustrated through tables 3 and 4 of the Core Strategy (Policy CS7) and the housing trajectory set out in the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52. The Strategic Housing and Employment Land Availability Assessment January 2020 (Core Document reference D13) identifies the issue of the separation of Rushmere from Ipswich in relation to site reference IP302 to which this representation refers. The adjacent land within East Suffolk, which was promoted through the Suffolk Coastal Local Plan, has not been allocated for development.</p>	
<p>Policy CS7 – The Amount of Housing Required</p>	<p>Main issue 13: Without full consideration of this and joint working to increase delivery, the stepped trajectory has not been justified and is unsound. Plan is also overly reliant on delivery of IGS for stepped delivery.</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26582)</p>	<p>Disagree for the following reason: The Council has worked jointly with East Suffolk Council to plan the delivery of cross-boundary development at the northern end of Humber Doucy Lane (allocation ISPA4.1 and policy ISPA4), subject to master planning. The adjacent land within East Suffolk, which was promoted through the Suffolk Coastal Local Plan, has not been allocated for development. Ipswich Garden Suburb is progressing towards delivery: the planning agreements for two parcels of land were signed in January 2020 and may be viewed online (applications IP/14/00638/OUTFL and IP/16/00608/OUT). More information is provided about Ipswich</p>	

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			Garden Suburb in the Topic Paper, Core Document reference D57.	
Policy CS7 – The Amount of Housing Required	Main issue 14: Question the overall housing requirement and whether the Council have adequately considered uplifting to support economic growth as this contradicts paragraph 8.168. Contrary to NPPF 35 and not positively prepared or effective.	Bloor Homes (Strutt and Parker) (Rep ID: 26582)	Disagree for the following reason: the housing requirement has been calculated in accordance with the Government's methodology. The Council has considered the question of uplift to the housing requirement figure and concluded that it is not appropriate. This is described in the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf</a>
Policy CS7 – The Amount of Housing Required	Main issue 15: Plan fails to acknowledge or address the 20% buffer required by the housing delivery test. More short/ medium term sites needed to ensure consistent delivery. Land north of Burrell Road would aid delivery of windfall development.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26649)	Disagree for the following reason: the five year housing land supply and the need to apply a 20% buffer to the supply at present are addressed through the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52. It would not be appropriate to allocate land north of Burrell Road without the evidence to support it, but it could come forward as a windfall site to be determined on its merits.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d52_-_reviewing_the_ipswich_housing_figure_topic_paper_june_2020.pdf</a>

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Policy CS7 – The Amount of Housing Required	Main issue 16: Support aims of Housing Delivery Action Plan.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26649)	Noted - no modification required	
Policy CS7 – The Amount of Housing Required	Main issue 17: Concerning that only 47 windfall dwellings delivered 2017-18 but plan relies on 50 per annum.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26649)	Disagree for the following reason: The Authority Monitoring Report 2018-19 (Core Document reference E1) shows that during the year 2018-19, 68 windfall homes were delivered. The windfall assumption in the Local Plan takes account of trend data for completions over a number of years and is considered robust.	
Policy CS7 – The Amount of Housing Required	Main issue 18: Support 100% previously developed land aim in IP-One.	Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26649)	Noted - no modification required.	

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<p>Policy CS7 – The Amount of Housing Required</p>	<p>Main issue 19 (see also 6-9): The housing requirement is too low; it should not be stepped; historic delivery shows need will not be met; IP-One sites are unrealistic; economic and affordable housing needs will not be met; delivery rate at IGS is overestimated; further distribution across the HMA is required.</p>	<p>Gladman Homes (Rep ID: 26406)</p>	<p>Disagree for the following reason: the housing requirement and jobs target are evidence based figures as set out in the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52. Affordable housing will be delivered and this is addressed through the Affordable Housing Topic Paper, Core Document reference D53. The delivery of some IP-One sites is uncertain, due to existing occupiers for example, and therefore they have been allocated as 'Opportunity Sites' through policy SP4 and are not counted as part of the housing land supply. The delivery rate at Ipswich Garden suburb reflects the latest available information. The Ipswich Garden Suburb Topic Paper provides more context for the development (Core Document reference D57).</p>	
<p>Policy CS7 – The Amount of Housing Required</p>	<p>Main issue 20: Housing requirement – The policy is not sound, the housing requirement has not been justified. The Council's desire for jobs and economic growth is not matched by the Council's decision to adopt a lower housing requirement.</p>	<p>Home Builders Federation (Rep ID: 26323)</p>	<p>Disagree for the following reason: The housing requirement is an evidence based figure as set out in the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52. The jobs figure is based on the 2017 East of England Forecasting Model which is the latest available data.</p>	

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<p>Policy CS7 – The Amount of Housing Required</p>	<p>Main issue 21: Housing requirement - The policy is not sound, the housing requirement has not been justified. The Council will not meet its need for affordable housing.</p>	<p>Home Builders Federation (Rep ID: 26315)</p>	<p>Disagree for the following reason: Affordable housing is addressed through the Affordable Housing Topic Paper, Core Document reference D53. The Local Plan sits alongside a proactive Council building programme which is already delivering affordable homes. In addition to this, the Council is in the early stages of engaging with Homes England regarding site delivery, and also preparing to assist the burden for private developers in arranging to take on the delivery and management of affordable rented properties on their behalf, as a Registered Provider.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d53_-_affordable_housing_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d53_-_affordable_housing_topic_paper_june_2020.pdf</a></p>
<p>Policy CS7 – The Amount of Housing Required</p>	<p>Main issue 22: Stepped approach – The policy is not sound, the stepped trajectory has not been justified. Do not agree with the steps proposed. The approach is not sufficiently challenging and is likely to lead to the whole plan underdelivering.</p>	<p>Home Builders Federation (Rep ID: 26313)</p>	<p>Disagree for the following reason: The stepping, set out in policy CS7 ties in with the expected delivery of homes at Ipswich Garden Suburb. It is therefore justified and evidence based. A housing trajectory is included in the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52.</p>	

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Policy CS7 – The Amount of Housing Required	Main issue 23: Housing supply - It is not evident which sites form the basis of supply within the first five years of the plan. It will be necessary for the Council to provide a detailed site by site assessment of delivery across the plan period.	Home Builders Federation (Rep ID: 26311)	Disagree for the following reason: A detailed housing trajectory is provided as part of the Reviewing the Ipswich Housing Figure Topic Paper and addendum, Core Document reference D52. The topic paper also sets out the five year housing land supply calculation.	
Policy CS7 – The Amount of Housing Required	Main issue 24: A prescriptive approach in the interpretation of the policy would limit opportunities to respond to market forces. Persimmon also endorse the statement made by the HBF.	Persimmon Homes (Rep ID: 26426)	Disagree for the following reasons: the plan has been subject to whole plan viability testing and found to be deliverable (Core Document reference D42).	
Policy CS7 – The Amount of Housing Required	Main issue 25: Object to soundness. Policy CS7 contradicts the text in paragraph 8.58. It is unclear whether Ipswich can meet its housing need beyond 2031. Ipswich have not adhered to the correct and proper process as set out in the ISPA Statement of Common Ground where housing need cannot be met.	Babergh and Mid Suffolk (Rep ID: 26464)	This matter is covered in the draft Statement of Common Ground with Babergh and Mid Suffolk District Councils which is progressing forward. This would amend the wording of paragraph 8.58.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a26_-_draft_statement_of_common_ground_with_bmsdc.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a26_-_draft_statement_of_common_ground_with_bmsdc.pdf</a>

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<p>Policy CS7 – The Amount of Housing Required</p>	<p>Main issue 26: Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), under CS2(b), suggest alternative reference to allocation of land off Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings).</p>	<p>Ipswich School (Rep ID: 26626)</p>	<p>Disagree for the following reasons: the site the objector is promoting is identified as a site needed to provide replacement sports facilities for the existing sports facilities land allocated for housing and associated infrastructure at IGS (policy CS10) and therefore the sports allocation needs to be retained.</p>	
<p>Policy CS8 – Housing Type and Tenure</p>	<p>Main issue 1: The CCG and Alliance partners are willing to be involved in any discussions involving assisted living and residential care homes. This area of development puts strain on all healthcare providers and being involved in discussions from the earliest stage possible will help primary, secondary, community and mental health care mitigate the impact.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26210)</p>	<p>Noted - IBC will continue to liaise with the CCG and Alliance partners.</p>	

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<p>Policy CS8 – Housing Type and Tenure</p>	<p>Main issue 2: There is a need for elderly accommodation and policy needs to be expanded to acknowledge that retirement living supported.</p>	<p>Constable Homes (Tom Cole) (Rep ID: 26301)</p>	<p>Disagree for the following reason: the Council's evidence in the Strategic Housing Market Assessment (Core Document reference D15 and update D16) indicates that the proportion of older persons (over 65) is lower in Ipswich than the national and regional average (19.1% compared with 20.5% and 22.3%) . Whilst this element of the population is forecast to grow, the SHMA also warns against being too prescriptive in the type of accommodation provided (6.11). Appendix 6 indicates that there will be a surplus of provision for older people in Ipswich.</p>	
<p>Policy CS8 – Housing Type and Tenure</p>	<p>Main issue 3: The surplus of accommodation referred to in the policy relates to sheltered accommodation. This does not include elderly accommodation and as such the policy needs to set out the need for elderly accommodation specifically.</p>	<p>Constable Homes (Tom Cole) (Rep ID: 26301)</p>	<p>Disagree for the following reason: the Strategic Housing Market Assessment (Core Document reference D15 and update D16) refers to sheltered housing, enhanced sheltered housing and extra care housing which can include retirement housing.</p>	
<p>Policy CS8 – Housing Type and Tenure</p>	<p>Main issue 4: The delivery of elderly accommodation at Red House Farm would have a trickle-down benefit of freeing up other housing from people down-sizing.</p>	<p>Constable Homes (Tom Cole) (Rep ID: 26301)</p>	<p>Disagree for the following reason: the policy requirement for a mix of housing provision within major developments provides opportunities for down-sizing where older person households wish to do so.</p>	

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<p>Policy CS8 – Housing Type and Tenure</p>	<p>Main issue 5: The draft plan does not acknowledge the need for specialised housing for more able older people who wish to retain a level of independence and does not address the projected increase in over 65s with appropriate housing provision.</p>	<p>Councillor Timothy Lockington (Rep ID: 26310)</p>	<p>Disagree for the following reasons: The plan requires 25% of new developments over 10 dwellings to be built to M4(2) accessible and adaptable standards. This will allow for homes to be adapted in the future to meet ageing resident's changing needs and allow them to remain in their own homes for longer. The plan acknowledges that the number of over 65s in the Borough will increase across the Local Plan period but also that, overall, Ipswich has a younger population profile than the rest of the Ipswich HMA and, as such, provision of appropriate housing is proportionate to need.</p>	
<p>Policy CS8 – Housing Type and Tenure</p>	<p>Main issue 6: Support inclusion of up to date definitions of affordable housing in CS8 and CS12, as set out in Annex 2 of the framework.</p>	<p>Rentplus UK (Rep ID: 26357)</p>	<p>Noted - no modification required.</p>	

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<p>Policy CS8 – Housing Type and Tenure</p>	<p>Main issue 7: Welcome amendments to CS8 promoting a more flexible approach to mix where evidenced by the SHMA. However, for clarity and consistency, policy should be reworded to include reference to tenure as well as size and type when referring to appropriate mix of homes.</p>	<p>Rentplus UK (Rep ID: 26360)</p>	<p>Disagree for the following reason: Policy CS8 refers to tenure.</p>	
<p>Policy CS8 – Housing Type and Tenure</p>	<p>Main issue 8: Welcome policy on housing type and tenure mix and the recognition of potential exceptions to these requirements. Note desire to secure high density development on central sites (para 8.121), however, high density may not be appropriate in all instances.</p>	<p>Associated British Ports (Rep ID: 26470)</p>	<p>Disagree for the following reason: the NPPF requires planning policies to make efficient use of land (122) and policy DM23 the Density of Residential Development allows for certain exceptions to the density requirement.</p>	
<p>Policy CS8 – Housing Type and Tenure</p>	<p>Main issue 9: Generally supportive of CS8. Welcome acknowledgement that it may not always be viable to provide a full mix of dwelling types and sizes.</p>	<p>Cardinal Lofts (Mill Ltd) (Rep ID: 26557)</p>	<p>Noted - no modification required.</p>	

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<p>Policy CS8 – Housing Type and Tenure</p>	<p>Main issue 10: There is a disconnect between Policy CS8 seeking a mix of housing to meet the identified needs and site allocations, contrary to national policy. 61% of dwellings proposed are at a high density. These are likely to be small flats and over saturate this market. 13% of dwellings will be low density and predominantly houses, we question if this will meet the actual housing mix identified in qualitative terms or the overall need figure.</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26586)</p>	<p>Disagree for the following reason: The NPPF sets out the importance of making effective use of land and the Borough is a tightly bound urban authority. Therefore, naturally, there is an emphasis on high density development to achieve this.</p>	
<p>Policy CS8 – Housing Type and Tenure</p>	<p>Main issue 11: IGS only likely to deliver post 2024 so there is a need for 3-bedroom and larger homes in early plan period. The Site can deliver this.</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26586)</p>	<p>Disagree for the following reason: The housing trajectory at 1st April 2020 contained in the Reviewing the Ipswich Housing Requirement Topic Paper (Core Document reference 52) shows that delivery is expected to commence at Ipswich Garden Suburb in 2022.</p>	

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Policy CS8 – Housing Type and Tenure	Main issue 12: It is recommended that the Self and Custom Build element of the policy is modified so it as the discretion of the developer to provide self-build homes on site.	Gladman Homes (Rep ID: 26411)	Disagree for the following reason: The policy is framed to be flexible rather than prescriptive and the Council has obligations under the Self Build and Custom Housebuilding Act 2015 to ensure that enough suitable development permissions are given to meet the identified demand.	
Policy CS8 – Housing Type and Tenure	Main issue 13: There is a weak market for high density flatted development in Ipswich. It is recommended that allocations for schemes are revisited with a view to allow for lower density development. Persimmon also endorse the statements made by the HBF.	Persimmon Homes (Rep ID: 26386)	Disagree for the following reason: The NPPF sets out the importance of making effective use of land and the Borough is a tightly bound urban authority. Therefore, naturally, there is an emphasis on high density development to achieve this, particularly in the central area of Ipswich. To apply only low densities in the central areas of Ipswich would compromise the delivery of the wider vision and strategy of the Local Plan Review and harm the sustainability of the development of the Borough by failing to use brownfield land effectively.	
Policy CS8 – Housing Type and Tenure	Main issue 14: The policy does not define what constitutes an up to date SHMA. Persimmon Homes also endorse representation submitted by HBF.	Persimmon Homes (Rep ID: 26424)	Disagree for the following reason: Paragraph 8.114 provides a definition of what is 'up to date' in relation to the SHMA.	

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<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 1: The 'improvements to Fonnereau Way' listed in Table 8B need to ensure the route is safe for pedestrians as it is currently not safe.</p>	<p>Mr and Mrs Fred Lewis (Rep ID: 26188)</p>	<p>Disagree for the following reason: Matters such as highway safety and enhancing public rights of way in all development applications are addressed through policy DM21. The Ipswich Garden Suburb Supplementary Planning Document (SPD) (Core Document reference G18) and the first two planning consents and planning agreements relating to the delivery of Ipswich Garden Suburb (IGS) (IP/14/00638/OUTFL and IP/16/00608/OUT) provide more detail about the IGS development and secure financial contributions towards Public Footpath 18, Ipswich Bridleway 21 and Westerfield Bridleway 1. The IGS SPD refers to the provision of new pedestrian / cycle bridge to replace the existing sub-standard at grade crossing where the Fonnereau Way currently crosses the railway line.</p>	
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<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 2: NHS England are not dispensing new primary care contracts currently so the opportunities of establishing a new health centre in the Ipswich Garden Suburb are severely reduced. Despite the relatively large size of the garden suburb development, primary care will be provided for the new patients at both Two Rivers Medical Centre and the new health centre proposed at the Tooks Bakery site.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26211)</p>	<p>Noted - This has been set out and a position agreed through the IBC, CCG and ESNEFT draft Statement of Common Ground. It was agreed that this uncertainty was reflected in the change from the Preferred Options Local Plan to the Final Draft Local Plan where "health centre" was replaced with "healthcare provision". Parties agree that it is still appropriate to include a requirement for healthcare provision at the Ipswich Garden Suburb which will be the subject of S106 negotiations as part of the future IGS applications. No modification required.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23-draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23-draft_statement_of_common_ground_with_ccg_esneft.pdf</a></p>
<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 3: Remove "healthcare provision" from policy wording for the district centre element and update to reflect the absorption of capacity at Tooks/ Two Rivers Medical Centres instead.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26211)</p>	<p>Noted - This has been set out and a position agreed through the IBC, CCG and ESNEFT draft Statement of Common Ground. It was agreed that this uncertainty was reflected in the change from the Preferred Options Local Plan to the Final Draft Local Plan where "health centre" was replaced with "healthcare provision". Parties agree that it is still appropriate to include a requirement for healthcare provision at the Ipswich Garden Suburb which will be the subject of S106 negotiations as part of the future IGS applications. No modification required.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23-draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23-draft_statement_of_common_ground_with_ccg_esneft.pdf</a></p>

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<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 4: The existing route through Broadacres at the northern end of Fonnereau Way does not meet the provisions of the NPPF or Section 18 of the Crime and Disorder Act 1998. The SPD represents an opportunity to phase out this unsafe route and eradicate the threat of crime, vandalism and anti-social behaviour by keeping the route within the Country Park.</p>	<p>D Wiseman (Rep ID: 26251)</p>	<p>Disagree for the following reason: The Fonnereau Way is an existing right of way and there is a separate legal process for re-routing such paths out with the Local Plan process. Planning Permissions IP/14/00638/OUTFL and IP/16/00608/OUT) have secured financial contributions towards Public Footpath 18, Ipswich Bridleway 21 and Westerfield Bridleway 1 .</p>	
<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 5: Table 8B: Unclear whether infrastructure improvements to Fonnereau Way relate to exiting route currently defined or amended route within country park.</p>	<p>D Wiseman (Rep ID: 26253)</p>	<p>Disagree for the following reason: The Fonnereau Way is an existing right of way and there is a separate legal process for re-routing such paths out of the Local Plan process. Planning Permissions IP/14/00638/OUTFL and IP/16/00608/OUT) have secured financial contributions towards Public Footpath 18, Ipswich Bridleway 21 and Westerfield Bridleway 1 .</p>	

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<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 6: Concerns regarding the reference to 'dual use playing fields'. The policy requirement for outdoor sport should not include school playing fields. The requirement for replacement playing fields for Ipswich School must be in addition to the policy requirements for community outdoor sport provision.</p>	<p>Sport England (Rep ID: 26280)</p>	<p>Disagree for the following reason: The Ipswich School playing fields within the Ipswich Garden Suburb allocation of policy CS10 are to be replaced on land at Tuddenham Road which is also identified through the policy and on the policies map ('land allocated for sports use'). The dual use of primary school playing fields that will come forward as part of the development has been agreed for Henley Gate and Fonnereau neighbourhoods through the planning permissions and planning agreements.</p>	
<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 7: Landowner of Red House Farm supports continued allocation of land for residential development but objects to content of policy.</p>	<p>Constable Homes (Tom Cole) (Rep ID: 26297)</p>	<p>Noted - the policy content comments about the phasing are addressed below (CS10, phasing shown through Map IGS1). The original representation is that the land could be developed independently of the rest of the Red House parcel with access taken from Tuddenham Road. Disagree, because access parameters are clearly set out in the Ipswich Garden Suburb SPD and the Highway Authority has not supported access being taken from Tuddenham Road. In addition, the Ipswich Garden Suburb SPD seeks to have the IGS developed comprehensively. Therefore, to allow this part of Red House Farm to be developed piecemeal could adversely affect a cohesive development.</p>	

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Policy CS10 – Ipswich Garden Suburb	Main issue 8: The numbering of parcels on Figure 2 of policy is misleading as it implies sites should be delivered in numerical order.	Constable Homes (Tom Cole) (Rep ID: 26302)	Disagree for the following reasons: The parcel numbering on MapIGS1 shows the phases of development at Ipswich Garden Suburb as defined through the Infrastructure Delivery Plan adopted February 2017.	
Policy CS10 – Ipswich Garden Suburb	Main issue 9: Site N3(b) Red House Farm can come forward independently and this should be reflected in the policy wording. Recommend policy is amended to outline how each parcel could come forward individually.	Constable Homes (Tom Cole) (Rep ID: 26302)	Disagree for the following reasons: Policy CS10 is by its nature a strategic policy which looks at how best to achieve the concept of the Ipswich Garden Suburb (IGS) as a whole and the social and transport infrastructure required to deliver it. Policy CS10 and the Ipswich Garden Suburb SPD seek to ensure that the IGS is developed comprehensively. Therefore, to allow this part of Red House Farm to be developed piecemeal could adversely affect a cohesive and integrated development.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/igs_idp_report_final.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/igs_idp_report_final.pdf</a>

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<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 10: Support protection of physical separation between Ipswich and Westerfield village. In line with Policy SCLP10.5 of the Suffolk Coastal Final Draft Local Plan. CS10 facilitates a country park towards the north of the Ipswich Garden Suburb and the Suffolk Coastal Final Draft Local Plan carries forward the allocation of land as part of the country park.</p>	<p>East Suffolk Council (Rep ID: 26394)</p>	<p>Noted - no modification required.</p>	
<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 11: More realistic affordable housing target needs to be given for IGS whole site considering existing permissions only requiring 5% and 4%.</p>	<p>Councillor Oliver Holmes (Rep ID: 26622)</p>	<p>Disagree for the following reasons: - It is acknowledged that the 4% and 5% affordable housing negotiated as part of the S106 negotiations to date does not meet the 31% target. The 4% and 5% were the optimum affordable housing percentages that could be agreed based on viability at the time of determination for the two applications. However, the S106s for outline planning permissions 14/00638/OUTFL and 16/00608/OUT have secured two viability assessment reviews during the delivery of the developments to determine if further affordable housing can be delivered. These reviews may result in higher percentages of affordable housing from the developments.</p>	

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			The delivery of the IGS is over a long period of time and therefore market conditions are unknown. Ultimately, the 31% affordable housing target is a target that IBC would want to be delivered if viable to do so.	
Policy CS10 – Ipswich Garden Suburb	Main issue 12: Quotes from SOCS and Portfolio Holder regarding impacts/ challenges (see attached). (Note to Inspector - detailed points are itemised in the main issues 13-20 that follow).	Save Our Country Spaces (Rep ID: 26354)	The detailed points are addressed through the responses that follow for main issues 13 to 20.	
Policy CS10 – Ipswich Garden Suburb	Main issue 13: Concerns regarding air quality, flood risk vulnerability and biodiversity/ habitat loss.	Save Our Country Spaces (Rep ID: 26354)	Disagree for the following reasons: Biodiversity will need to be preserved and must incorporate net gain. The Ipswich Wildlife Audit 2019 provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless other means of biodiversity enhancement are appropriate.	

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			The planning permissions 14/00638/OUTFL and 16/00608/OUT set out requirements relating to site-wide ecology and drainage strategies and construction stage air quality.	
Policy CS10 – Ipswich Garden Suburb	Main issue 14: Future households will bear costs of management/ maintenance of drainage, levy new houses instead.	Save Our Country Spaces (Rep ID: 26354)	Disagree for the following reasons: The site developer will have to pay for any drainage requirements associated with the development and any upgrading of the existing system if there is insufficient capacity and the planning application will require a Drainage Strategy and SuDs as appropriate.	
Policy CS10 – Ipswich Garden Suburb	Main issue 15: Concerns on road network to cope with additional traffic without northern relief road.	Save Our Country Spaces (Rep ID: 26354)	Disagree for the following reason: Traffic modelling and transport assessments for the Ipswich Garden Suburb have not shown that a northern relief road is necessary.	

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<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 16: Concerned bridges not built in time to secure HIF and permissions only require vehicle bridge on delivery of 699 homes, impossible before March 2022 (HIF). Bridge too narrow for all road users and needed for safety. Need contingency measures for alternative funding.</p>	<p>Save Our Country Spaces (Rep ID: 26354) Northern Fringe Protection Group (Rep ID: 26532)</p>	<p>Disagree for the following reason: The occupational triggers for the delivery of the bridges are based on the planning needs for when these need to come forward within the development. The delivery of the vehicular bridge is secured by a planning condition under 16/00608/OUT (Henley Gate). The pedestrian and cycle bridge is secured by S106 Obligations with the Agreements for both application 14/00638/OUTFL and 16/00608/OUT. How the development is financed, is separate to when infrastructure is required for planning reasons. Nethertheless, there are provisions within the S106 Agreements for outline planning permissions 14/00638/OUTFL and 16/00608/OUT to deliver these bridges by the occupation triggers should HIF not come forward.</p>	
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<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 17: Delivery of roads must be compatible with traffic modelling. Modelling is hiding fact that Ipswich roads near IGS are already heavily congested with roads already operating at capacity at peak times. Modelling must identify when key junctions and links reach capacity and how congestion will be mitigated. Concerned that modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads, worsening air quality and no assessment of this factored in.</p>	<p>Save Our Country Spaces (Rep ID: 26354) Northern Fringe Protection Group (Rep ID: 26532)</p>	<p>Disagree for the following reason: the Ipswich Garden Suburb planning applications were accompanied by detailed traffic assessments and mitigation and air quality assessments which were assessed as part of the determination of the applications. The mitigation required is secured through the planning conditions and S106 Obligations, for example improvements to the Westerfield/Valley Road roundabout to increase capacity. Whole plan transport modelling has been undertaken to inform the Final Draft Local Plan and shows that there will be capacity issues within the transport network if no action is taken. Work is being driven and is underway through the ISPA Transport Mitigation Strategy work.</p>	
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<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 18: Sewage infrastructure should be included. No agreed sewage infrastructure. If sewage infrastructure cannot be provided at the right time and right price for the IGS (as a whole) then IGS cannot be delivered in accordance with the Plan. All off-line sewage storage should be provided on-site.</p>	<p>Save Our Country Spaces (Rep ID: 26354) Northern Fringe Protection Group (Rep ID: 26532)</p>	<p>Disagree for the following reason: Anglian Water were consulted on both determined planning applications on the IGS and raised no objection to these applications being determined. Both outline planning permissions secure details of the site wide foul and surface water drainage system for the development, including what is required for each development phase. It is not reasonable to require all of the off-line sewage storage to be provided on-site (this would be contrary to Para. 55 of the NPPF).</p>	
<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 19: Not clear what RAMS S106 payments agreed with CBRE and Crest as S106 not public. If no RAMS tariffs included this could be in breach of SPD and policies CS4, CS17 and DM31 of adopted CS. New CS unsound in relation to CS4 CS17 and DM8 as no means of funding the required.</p>	<p>Save Our Country Spaces (Rep ID: 26354) Northern Fringe Protection Group (Rep ID: 26532)</p>	<p>Disagree for the following reason: Section 106 planning agreements are available to view on the Council's website  <a href="https://www.ipswich.gov.uk/content/planning-application-ip1600608out-april-2018-update">https://www.ipswich.gov.uk/content/planning-application-ip1600608out-april-2018-update</a>  and  <a href="https://www.ipswich.gov.uk/content/planning-application-ip1400638outfl-april-2018-update">https://www.ipswich.gov.uk/content/planning-application-ip1400638outfl-april-2018-update</a>  update. The HRA requirements for applications 14/00638/OUTFL and 16/00608/OUT have been secured through planning conditions and S106 Obligations. For the recreational pressure of the development alone a financial contribution towards the delivery of a Country Park on the IGS and on-site public open space is required; for the in-</p>	

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			combination effects, a RAMS contribution of £7,500 per application.	
Policy CS10 – Ipswich Garden Suburb	Main issue 20: Sizewell-C and Felixstowe 30% increase in trains not assessed (rail-freight). No AQA for IGS permissions.	Save Our Country Spaces (Rep ID: 26354) Northern Fringe Protection Group (Rep ID: 26532)	Disagree for the following reason: There is a separate application process for the Sizewell C application as a Nationally Significant Infrastructure Project and its impacts would be considered through that process. The assessment of noise and vibration from increased train traffic is a matter for the reserved matters applications regarding the Ipswich Garden Suburb based on the evidence available at the time of determination. It is not reasonable to undertake noise/ vibration assessments as part of this Local Plan on this specific site. Air quality assessments were prepared for the IGS planning applications.	

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<p>Policy CS10 – Ipswich Garden Suburb</p>	<p>Main issue 21: Mersea Homes Ltd are broadly supportive of Policy CS10 and its various provisions, but in order to ensure effective delivery, there are three aspects of the policy that are considered to be unsound, as follows:</p> <ol style="list-style-type: none"> <li>1. Elements of the detailed wording of the policy in relation to site specific matters and the role of the SPD, which relate to Effectiveness;</li> <li>2. The Affordable Housing provisions, which relate to soundness issues in respect of the justification and the effectiveness of the Policy;</li> <li>3. The wording of the Policy in respect of viability review provisions. Please see full representation text for proposed amendments.</li> </ol>	<p>Mersea Homes (Phase 2 Planning and Development Ltd) (Rep ID: 26330)</p>	<p>Disagree for the following reason: It is acknowledged that the 4% and 5% affordable housing negotiated as part of the S106 negotiations to date does not meet the 31% target. The 4% and 5% were the optimum affordable housing percentages that could be agreed based on viability at the time of determination for the two applications. However, the S106s for outline planning permissions 14/00638/OUTFL and 16/00608/OUT have secured two viability assessment reviews during the delivery of the developments to determine if further affordable housing can be delivered. These reviews may result in higher percentages of affordable housing from the developments. The delivery of the IGS is over a long period of time and therefore market conditions are unknown. Ultimately, the 31% affordable housing target is a target that IBC would want to be delivered if viable to do so. The policy has allowed for viability to be a consideration as part of determined planning applications.</p>	
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Policy CS10 – Ipswich Garden Suburb	Main issue 22: As the delivery rate at Ipswich Garden Suburb has been overestimated, significantly more housing sites need to be identified to support the housing land supply.	Gladman Homes (Rep ID: 26415)	Disagree for the following reason: These delivery rates have been based on information from Ipswich Garden Suburb developers.	
Policy CS10 – Ipswich Garden Suburb	Main issue 23: support school allocations but DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue.	Department for Education (Rep ID: 26540)	Noted. The S106 Agreements for outline planning permissions 14/00638/OUTFL and 16/00608/OUT both secure serviced sites for the Primary School for each Ipswich Garden Suburb neighbourhood to be transferred to Suffolk Country Council and financial contributions for early years/primary/secondary and sixth form education to be paid to Suffolk County Council.	
Policy CS10 – Ipswich Garden Suburb	Main issue 24: Support delivery of homes at IGS and associated infrastructure including 1,200 secondary school places.	Babergh and Mid Suffolk (Rep ID: 26453)	Noted - no modification required.	
Policy CS11 – Gypsy and Traveller Accommodation	Main issue 1: The CCG will be happy to be involved in any proposed gypsy and traveller site discussions to ensure that the residents will be able to access primary care.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26212)	Noted - no modification required.	

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Policy CS11 – Gypsy and Traveller Accommodation	Main issue 2: Support this policy, specifically the amendment undertaken to paragraph 8.148 regarding flood risk.	Environment Agency (Rep ID: 26276)	Noted - no modification required.	
Policy CS11 – Gypsy and Traveller Accommodation	Main issue 3: Support policy CS11 as being positively prepared. Support the provision of appropriate pitches to meet the identified need which will be secured through the policy.	West Suffolk (Forest Heath District Council and St Edmundsbury Borough Council) (Rep ID: 26290)	Noted - no modification required.	
Policy CS11 – Gypsy and Traveller Accommodation	Main issue 4: Support policy seeking to identify land within Borough for permanent Gypsy and Traveller pitches to meet identified need. Policy includes reference to developing short stay site between Ipswich and Felixstowe - should apply flexibility in meeting short stay needs to be consistent with approach in Statement of Common Ground.	East Suffolk Council (Rep ID: 26397)	Noted. Short stay stopping points has been addressed in the joint statement of common ground signed between IBC and East Suffolk Council.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_-_statement_of_common_ground_with_east_suffolk_council_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_-_statement_of_common_ground_with_east_suffolk_council_0.pdf</a>

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Policy CS11 – Gypsy and Traveller Accommodation	Main issue 5: Object to soundness. Ipswich need to find 27 permanent pitches to 2036. No contact has been made with IBC regarding permanent provision.	Babergh and Mid Suffolk (Rep ID: 26454)	Noted. See draft SoCG currently being negotiated between IBC and Babergh and Mid Suffolk District Councils.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a26-draft_statement_of_common_ground_with_bmsdc.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a26-draft_statement_of_common_ground_with_bmsdc.pdf</a>
Policy CS12 – Affordable Housing	Main issue 1: Unsound and not consistent with national policy. The phrase 'at least 15%' does not provide the necessary clarity for applicants and decision makers and should be removed.	Home Builders Federation (Rep ID: 26303)	Disagree for the following reason: The 15% minimum requirement for affordable housing is based on the outcomes of the Whole Plan Viability Assessment which supports the Local Plan Review. This assessment found that 15% was the lowest viable amount in the typologies with the poorest overall viability. These typologies comprised of brownfield sites in the low value area of the Borough, with a mix of flats and houses. In the other more viable typologies, such as brownfield sites in the higher value areas or greenfield sites more generally, it was found that there was scope to provide higher percentages of affordable housing provision without compromising viability. Therefore, it is considered that the terminology of "at least 15%" is sound to ensure that the Local Plan Review is flexible enough to capture greater proportion of affordable housing, where viable, to help meet the identified affordable housing need of the Borough (as set out in the SHMA) and to realise the vision and objections of the Local Plan Review.	

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<p>Policy CS12 – Affordable Housing</p>	<p>Main issue 2: Unsound and not consistent with national policy. The viability assessment may have underestimated the level of abnormal costs that occur when developing brownfield sites. The Council may need to consider a lower affordable housing requirement on brownfield sites or amend other policy requirements.</p>	<p>Home Builders Federation (Rep ID: 26350)</p>	<p>Disagree for the following reason:</p> <ul style="list-style-type: none"> <li>- The levels of abnormal costs inputted into the whole plan viability assessment are set at £175,000 per net developable acre which is noticeably higher than the £110,000 figure that the best practice guidance typically recommends. This was deliberately raised to reflect the abnormal costs that are unique to Ipswich, particularly on the central brownfield sites (e.g. flood risk, archaeology, contamination etc).</li> <li>- The affordable housing requirement of 15% is considered to be reasonable and achievable in the majority of circumstances. The policy wording acknowledges that there will be some cases where affordable housing levels will be negotiated on a case by case basis which is considered to be the most effective way of managing affordable housing delivery in the Borough where it is not achievable to obtain 15%. Furthermore, the starting point of 15 dwellings for requiring affordable housing is more flexible than the 10 dwelling starting point imposed by the NPPF. This has been done taking account of the viability challenges that some scenarios in the Borough face.</li> </ul>	
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Policy CS12 – Affordable Housing	Main issue 3: Support inclusion of up to date definitions of affordable housing in CS8 and CS12, as set out in Annex 2 of the framework.	Rentplus UK (Rep ID: 26358)	Noted - no modification required.	
Policy CS12 – Affordable Housing	Main issue 4: Recommend a focused update to the SHMA is prepared to inform policy and planning decisions, which would assess needs for products such as affordable rent-to-buy. Supporting text should be added to CS12, committing to keeping the SHMA up to date.	Rentplus UK (Rep ID: 26368)	Disagree for the following reason: The supporting text to policy CS8 paragraph 8.114 addresses the currency of the SHMA. Rent-to-buy falls within the NPPF definition of 'other affordable routes to home ownership' and therefore the references within the policy CS12 to affordable home ownership would also cover this particular product.	

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<p>Policy CS12 – Affordable Housing</p>	<p>Main issue 5: Note requirement for major new development to provide 15% affordable housing and welcome the flexibility within the wording both in respect of the proportion of affordable housing and tenure mix where development viability justifies it.</p>	<p>Associated British Ports (Rep ID: 26471)</p>	<p>Noted - no modification required.</p>	
<p>Policy CS12 – Affordable Housing</p>	<p>Main issue 6: Generally supportive of CS12. Welcome acknowledgement that it may not always be viable to provide full affordable housing provision.</p>	<p>Cardinal Lofts (Mill Ltd) (Rep ID: 26558)</p>	<p>Noted - no modification required.</p>	

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<p>Policy CS12 – Affordable Housing</p>	<p>Main issue 7: The plan allocates a total of 1,647 affordable dwellings (assuming 30% IGS and ISPA4 and 15% on all other sites including windfall). In all likelihood this is overly optimistic given that most windfall sites are likely to be small and fall below the threshold set in Policy CS12. Based on the 239 dwellings per year in the SHMA, this would result in 38% of the affordable need. This is insufficient. Contrary to NPPF 20 and PPG.</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26585)</p>	<p>Disagree for the following reason: Affordable housing is addressed through the Affordable Housing Topic Paper, Core Document reference D53. The Local Plan sits alongside a proactive Council building programme which is already delivering affordable homes. In addition to this, the Council is in the early stages of engaging with Homes England regarding site delivery, and also preparing to assist the burden for private developers in arranging to take on the delivery and management of affordable rented properties on their behalf, as a Registered Provider.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d53_-_affordable_housing_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d53_-_affordable_housing_topic_paper_june_2020.pdf</a></p>
<p>Policy CS12 – Affordable Housing</p>	<p>Main issue 8: The Site can come forward to provide market and affordable housing to assist with meeting the need, working with East Suffolk.</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26585)</p>	<p>Disagree for the following reason: The adjacent land within East Suffolk, which was promoted through the Suffolk Coastal Local Plan, has not been allocated for development through the Suffolk Coastal area Local Plan.</p>	

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<p>Policy CS12 – Affordable Housing</p>	<p>Main issue 9: The approach will not meet affordable housing needs. Additional housing land needs to be allocated within neighbouring districts.</p>	<p>Gladman Homes (Rep ID: 26417)</p>	<p>Disagree for the following reasons: IBC has demonstrated that it can meet its housing needs and in particular achieve a good level of affordable housing within its own boundaries over the plan period. In addition, the whole plan viability shows that housing sites or sites where there are more houses than flats are viable as demonstrated in the Whole Plan Viability. The spatial option of delivering housing outside the Borough boundary has been broadly assessed as an option but did not score as highly in the Sustainability Appraisal compared to the preferred spatial option of high-density urban regeneration. This assessment is considered to be robust.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d53_-_affordable_housing_topic_paper_june_2020.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/d53_-_affordable_housing_topic_paper_june_2020.pdf</a></p>
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<p>Policy CS13 – Planning for Jobs Growth</p>	<p>Main issue 1: Recommend reducing land allocation to reflect actual need. Land allocation should be consistent with needs identified in Evidence Base (23.2ha). When compared with total land allocated for employment use (28.34ha) under Policy SP5, there is a significant excess of requirement. Even allowing for flexibility, the excess is not justified. Allocations require further review to ensure consistency with Evidence Base and to achieve soundness.</p>	<p>AquiGen (Rep ID: 26436)</p>	<p>Disagree for the following reason:  The excess allocation of 5.14ha of employment land is only representative of 22% above the minimum identified need. This additional land is necessary to ensure that the Council has a range of land types (greenfield/ brownfield), sizes (small, medium and large) and locations (business parks, industrial estates, town centre) to serve future economic needs.</p>	
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<p>Policy CS13 – Planning for Jobs Growth</p>	<p>Main issue 2: Support inclusion of reference at sub-point b. to the need to protect “land for employment uses in existing employment areas defined on the policies map, including the function and strategic role of the port to Ipswich” in response to ABP’s specific request for such reference at Preferred Options.</p>	<p>Associated British Ports (Rep ID: 26472)</p>	<p>Noted - no modification required.</p>	
<p>Policy CS13 – Planning for Jobs Growth</p>	<p>Main issue 3: The Council should be aspirational and seek to increase jobs growth not reduce it.</p>	<p>Gladman Homes (Rep ID: 26418)</p>	<p>Disagree for the following reason: - The Local Plan Review strategy and vision does seek to increase jobs growth. It is noted that the 9,500 approximate jobs target in the emerging Local Plan Review is lower than the 12,500 jobs target set out in the adopted Local Plan. However, this is based on the more recent 2017 EEFM data that is available which shows a forecast jobs growth of approximately 9,500 and this is the most up to date available evidence. In addition, the 12,500 jobs target in the adopted Local Plan aligns with a higher housing requirement compared to the emerging Local Plan Review. The 9,500 jobs forecast is therefore considered to provide a closer balance of homes and jobs growth with the more conservative housing requirement,</p>	

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			as set out by the standard methodology, in the emerging Local Plan Review.	
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<p>Policy CS14 – Retail Development and Main Town Centre Uses</p>	<p>Main issue 1: We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new homes. Question the need to allocate part of the Westgate site and the Mint Quarter for retail. We have always argued that Ipswich Borough Council has been over-estimating retail demand (as with previous undeliverable homes and employment targets).</p>	<p>Northern Fringe Protection Group (Rep ID: 26513)          Save Our Country Spaces (Rep ID: 26388)</p>	<p>Disagree for the following reason:          - The NPPF requires plan making authorities to look ahead over at least the next 10 years in evaluating retail needs. The 2017 Retail and Commercial Leisure Study originally identified this need as being circa 20,000sqm net comparison floorspace. The Council then commissioned a Retail Position Update Statement (August 2019) to take account of more recent evidence which demonstrated a lower need of approximately 10,000 sqm net of comparison floorspace. This updated requirement is based on the most up to date evidence base and is considered to be robust. Therefore re-allocating the identified retail allocations to housing would compromise the ability to deliver this.          The Westgate Site and Mint Quarter Site are the only two town centre sites that can realistically accommodate the large floorplate retail units that future retail occupiers are seeking.</p>	
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Policy CS15 – Education Provision	Main issue 1: The secondary school site at the Ipswich Garden Suburb should be referenced in the same way as primary school sites i.e. as a broad location (or, as per our representations to the Policies Map, all allocations within the IGS should be removed). Please see full representation text for proposed amendments.	Mersea Homes (Phase 2 Planning and Development Ltd) (Rep ID: 26309)	Disagree for the following reason: It is important to indicate on the policies map the allocations and infrastructure associated with IGS in accordance with the IGS Development SPD.	
Policy CS16 – Green Infrastructure	Main issue 1: The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26213)	Noted - no modification required.	
Policy CS16 – Green Infrastructure	Main issue 2: Support as previous comments (Reg 18) addressed.	Environment Agency (Rep ID: 26277)	Noted - no modification required.	

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<p>Policy CS16 – Green Infrastructure</p>	<p>Main issue 3: Support approach of working with partners in respect of the RAMS and new country park with the IGS. Support joint working to deliver strategic green infrastructure, in particular, the establishment of a green trail around Ipswich which is reflected in the Suffolk Coastal Final Draft Local Plan.</p>	<p>East Suffolk Council (Rep ID: 26400)</p>	<p>Noted - no modification required.</p>	
<p>Policy CS16 – Green Infrastructure</p>	<p>Main issue 4: In order for the plan to be sound there should be an explicit recognition that, on high density sites within the IP-One Area, and particularly along the Waterfront, it won't be possible to make full provision for private, and public, open space, in accordance with the Council's standards.</p>	<p>Cardinal Lofts (Mill Ltd) (Rep ID: 26559)</p>	<p>Disagree for the following reason: - Policies DM6 (Provision of new open spaces) and DM7 (Provision of Private Outdoor Amenity Space) state that full provision for private and public open space may not always be feasible on site due to other requirements but there are mechanisms for off-site provision to compensate.</p>	

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<p>Policy CS16 – Green Infrastructure</p>	<p>Main issue 5: Assessing Green Infrastructure, Sport and Recreation need should take account of future residents and changing desires/habits of the residents over time.</p>	<p>Councillor Oliver Holmes (Rep ID: 26624)</p>	<p>Disagree for the following reason: - Whilst the merits of the point are agreed with, it is considered that the Local Plan Review is inclusive of this. It is based on the latest available green infrastructure and sport/ recreation evidence to inform the amounts and types of provision required. The Council will continue to keep its approach to green infrastructure, sport and recreation under review and update any future emerging Local Plans or reviews if new evidence presents itself that warrants an alternative approach.</p>	
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<p>Policy CS16 – Green Infrastructure</p>	<p>Main issue 6: Object to change from green rim to green trail. Change in name is misleading and is actually to bring forward land at Humber Doucy Lane for development. Non-compliant with DM8. See appendix 1 for history of the green rim/ corridors. No mention of the green rim/ trail being used in the Ipswich Cycling Strategy.</p>	<p>Save Our Country Spaces (Rep ID: 26401) Northern Fringe Protection Group (Rep ID: 26520)</p>	<p>Disagree for the following reasons: The purpose of the green trail remains the same as the green rim as described in the adopted Local Plan. The reason for the name change was because it was brought to the attention of officers that the name "green rim" may falsely give the impression that this land is a de-facto green belt and purely restrictive in purpose. The green rim was established as a green infrastructure concept as an ecological and recreational/ accessible corridor and was designated as such to ensure that any development incorporates sufficient links to this corridor. The term "green trail" was considered to be a more accurate name which encompasses both the biodiversity and active travel functions. It is made clear in the site sheet (ISPA4.1) and policy (ISPA4) relating to the land at Humber Doucy Lane that any development will need to demonstrate that the green trail is incorporated. The Ipswich Cycling Strategy SPD sets out detailed measures for cycling routes within Ipswich. The indicative green trail is at a more primitive stage of strategic decision making than the routes within the Cycling Strategy SPD. The development of the green trail naturally will fall within the administrative boundaries of multiple ISPA authorities and this will require a different approach in liaison with Suffolk County Council and the other authorities.</p>	
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<p>Policy CS16 – Green Infrastructure</p>	<p>Main issue 7: Tuddenham Road/Westerfield green corridors are home to significant number of recorded protected species (great crested newts, badgers, hedgehogs, bats and all manner of species) as well as birds, flora/ fauna; Southern Marsh and bee orchids found on the Fynn Valley and adjacent area. Due to private ownership, there is little interest for formal surveys due to landowners aspirations for land use. SWT done some work within Red House Ipswich, the Fynn Valley CWS; a Hedgerow Survey of the whole IGS area completed. Active badger sets reported.</p>	<p>Save Our Country Spaces (Rep ID: 26401) Northern Fringe Protection Group (Rep ID: 26520)</p>	<p>Disagree for the following reasons: The Council considers that an integrated network of accessible open spaces, sport and recreation facilities is an essential part of the Borough's infrastructure and character. It provides opportunities for formal and informal recreation and sport, for wildlife to flourish and migrate around the area and for sustainable travel around the town on foot or by cycle. It also improves the townscape, helping to break up and soften the urban area. The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document will identify the sites and networks . The SWT has prepared a wildlife audit .The Ipswich Wildlife Audit 2019 provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless other means of biodiversity enhancement are appropriate. There are rows of Tree Preservation Orders (TPOs) along the boundary with Westerfield House that will need to be preserved unless there are overriding reasons for their removal. Where possible existing hedges onto Humber Doucy Lane shall be preserved and protected during the development process as applicable. The layout and design of any future development must incorporate the provision of a Green Trail walking and cycling route to</p>	
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			help deliver the wider Green Trail around Ipswich. The provision of Suitable Alternative Natural Green Space and other forms of open space will be required in accordance with the Open Space Standards set out in Appendix 5 of the Core Strategy and Development Management Policies DPD.	
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<p>Policy CS16 – Green Infrastructure</p>	<p>Main issue 8: The policy needs to be clear that new development should meet the needs arising from that development, having regard to the Council's standards, and should not be required to remedy existing deficits. Please see full representation text for suggested amendments.</p>	<p>Mersea Homes (Phase 2 Planning and Development Ltd) (Rep ID: 26308)</p>	<p>Disagree for the following reason: The development management policy DM6 Provision of new open spaces, sport and recreation facilities is clear that the provision of open space is to meet the needs of development occupiers.</p>	
<p>Policy CS16 – Green Infrastructure</p>	<p>Main issue 9: Support collaborative working on the RAMS, but need to ensure that RAMS contributions are spent to mitigate the impact from the development that generated the need for RAMS contributions.</p>	<p>Babergh and Mid Suffolk (Rep ID: 26460)</p>	<p>Disagree for the following reason: Whilst it is true that applicants do not have to sign-up to the Suffolk Coast RAMS approach, it is not optional to comply with the Habitat Regulations 2017 (as amended) as we all know. This is made clear in the Technical Report and Ipswich's adopted SPD. The RAMS Strategy has been commissioned , and agreed by the ISPA authorities and Natural England. It identifies strategic objectives and actions to be achieved through RAMS based on joint funding from the proportionate contributions achieved through new development in each of the districts. This is agreed and outlined in the ISPA statement of common ground (Iteration 6 ) as signed by all the ISPA authorities and Natural England (p-22-24). The strategy also includes a comprehensive monitoring and review programme that allows for new growth</p>	

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			<p>in emerging local plans to be incorporated into the avoidance and mitigation measures programme. Any issues raised on this matter, are being dealt with through other means such as the existing RAMS officer group or Board rather than through the local plan process.</p>	
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<p>Policy CS17 – Delivering Infrastructure</p>	<p>Main issue 1: The inclusion of GP surgeries and health centres as key strategic infrastructure is to be commended as this will allow the CCG to strategically plan ahead with the understanding that providing the business case is sustainable it will more likely get approval. NHS England has now provided instructions that all health providers should be looking to request mitigation through S106 or CIL as part of the planning application response process. As part of this process, developments over 250 dwellings will automatically go to the Alliance partners in health for them to make representation and request mitigation.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26214)</p>	<p>Noted - no modification required.</p>	
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Policy CS17 – Delivering Infrastructure	Main issue 2: Acute hospital facilities require referencing in policy wording.	East Suffolk & North Essex NHS Foundation Trust (Rep ID: 26265)	Agree - This has been reflected in the draft Statement of Common Ground between IBC, CCG and ESNEFT.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23-draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23-draft_statement_of_common_ground_with_ccg_esneft.pdf</a>
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<p>Policy CS17 – Delivering Infrastructure</p>	<p>Main issue 3: Categories broadly in line with infrastructure commitments in the Suffolk Coastal Final Draft Local Plan. Policy refers to infrastructure to be secured from new development including early years provision, but it is not clear in Table 8A whether early years provision in north east Ipswich is identified as an infrastructure priority, consistent with the Statement of Common Ground. Council has included criterion within SCLP12.24 for provision of early years setting on site, if needed. Recommend that this is replicated in ISPA4.</p>	<p>East Suffolk Council (Rep ID: 26405)</p>	<p>Agreed, this matter has been included in the agreed Statement of Common Ground between the two authorities and has been included in the draft Statement of Common Ground with Suffolk County Council dealing with Infrastructure.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25-statement_of_common_ground_with_east_suffolk_council_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25-statement_of_common_ground_with_east_suffolk_council_0.pdf</a></p>
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<p>Policy CS17 – Delivering Infrastructure</p>	<p>Main issue 4: Financing infrastructure through developer contributions is difficult in Ipswich as net profit margins are low and contributions are challenged by developers on viability grounds. The Draft needs to reflect this difficulty otherwise it is unsound.</p>	<p>Councillor Oliver Holmes (Rep ID: 26625)</p>	<p>Disagree for the following reason: - Whilst the Council agrees with the comment made, it should be pointed out that Policy CS17 highlights this challenge in the policy wording. Therefore no modification is necessary.</p>	
<p>Policy CS17 – Delivering Infrastructure</p>	<p>Main issue 5: Not clear what RAMS S106 payments agreed with CBRE and Crest sites as S106 are not publicly available. If no RAMS tariffs included in the S106 agreements this could be in breach of this SPD and policies CS4, CS17 and Policy DM31 of the adopted CS. New CS would be unsound in relation to CS4 CS17 and DM 8 as no means of funding the required.</p>	<p>Save Our Country Spaces (Rep ID: 26410) Northern Fringe Protection Group (Rep ID: 26528)</p>	<p>Disagree for the following reason: Section 106 planning agreements are available to view on the Council's website <a href="https://www.ipswich.gov.uk/content/planning-application-ip1600608out-april-2018-update">https://www.ipswich.gov.uk/content/planning-application-ip1600608out-april-2018-update</a> and <a href="https://www.ipswich.gov.uk/content/planning-application-ip1400638outfl-april-2018-update">https://www.ipswich.gov.uk/content/planning-application-ip1400638outfl-april-2018-update</a>. The HRA requirements for applications 14/00638/OUTFL and 16/00608/OUT have been secured through planning conditions and S106 Obligations. For the recreational pressure of the development alone a financial contribution towards the delivery of a Country Park on the IGS and on-site public open space is required; for the in-combination effects, a RAMS contribution of £7,500 per application.</p>	

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<p>Policy CS17 – Delivering Infrastructure</p>	<p>Main issue 6: No firm proposals for new sewage infrastructure required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables. The 13 transport projects need to be included in the Infrastructure Tables. If any of projects aren't delivered by the required dates (which need to be identified) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needed showing funding is in place for these schemes compatible with required delivery dates. Bramford Road/ Sproughton Road link road must be included.</p>	<p>Save Our Country Spaces (Rep ID: 26410) Northern Fringe Protection Group (Rep ID: 26528)</p>	<p>Disagree for the following reason: Anglian Water were consulted on both determined planning applications on the IGS and raised no objection to these applications being determined. Both outline planning permissions secure details of the site wide foul and surface water drainage system for the development, including what is required for each development phase. The Council has also worked with Anglian water in the preparation of the Local Plan, through engagement at each stage of the Local Plan Review Consultation as well as in the preparation of the joint Water Cycle Study.</p>	
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<p>Policy CS17 – Delivering Infrastructure</p>	<p>Main issue 7: Clarify that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth.</p>	<p>Department for Education (Rep ID: 26541)</p>	<p>There may be circumstances where this is appropriate. Clearly, where a Section 106 is already in place, retrospective funding arrangements will not be possible, however within a future Section 106 there can be triggers so that you can link the production of a phase of development to funding primary school places and this could allow for forward funding social infrastructure projects in advance of anticipated housing growth if the timing is appropriate. Policy CS17 could be modified to show where this could be applied.</p>	<p><a href="#">See CS17 Delivering Infrastructure</a></p>
<p>Policy CS17 – Delivering Infrastructure</p>	<p>Main issue 8: Support collaborative working on the RAMS, but need to ensure that RAMS contributions are spent to mitigate the impact from the development that generated the need for RAMS contributions</p>	<p>Babergh and Mid Suffolk (Rep ID: 26459)</p>	<p>Disagree for the following reason: Whilst it is true that applicants do not have to sign-up to the Suffolk Coast RAMS approach, it is not optional to comply with the Habitat Regulations 2017 (as amended) . If an alternative approach is adopted it must comply with the regulations. This is made clear in the Technical Report and Ipswich's adopted SPD. The RAMS Strategy has been commissioned , and agreed by the ISPA authorities and Natural England. It identifies strategic objectives and actions to be achieved through RAMS based on joint funding from the proportionate contributions achieved through new development in each of the districts. This is agreed and outlined in the ISPA statement of common ground (Iteration 6 ) as signed by all the ISPA authorities and Natural England (p-22-24). The strategy also</p>	

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			<p>includes a comprehensive monitoring and review programme that allows for new growth in emerging local plans to be incorporated into the avoidance and mitigation measures programme. To agree to the issue raised would contradict the existing agreement and current SoCG which all ISPA authorities and NE has signed up to. Any issues raised on this matter, are being dealt with through other means such as the existing RAMS officer group or Board rather than through the local plan process.</p>	
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Policy CS18 – Strategic Flood Defence	Main issue 1: Support IBC's positive commitment to delivery and funding of mitigation through a transport mitigation strategy as part of collaborative working through the ISPA board. Potential measures outlined in CS20 are consistent with the Suffolk County Council's Transport Mitigation Strategy.	East Suffolk Council (Rep ID: 26412)	Noted - no modification required.	
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<p>Policy CS19 – Provision of Health Services</p>	<p>Main issue 1: The support of primary care infrastructure is very welcome but due to a number of factors adhering to the policy of building near the town centre, district or local centre will be difficult. GP surgeries have catchment areas and these might conflict with your district or local centres. Primary Care Networks (PCNs) are being introduced to provide a variety of services through a number of surgeries working together and this could influence the location of any new health facility.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26215)</p>	<p>Noted - It has been agreed through the draft CCG, ESNEFT and IBC Statement of Common Ground that as a general approach to locating development there are many health benefits from pursuing this policy such as encouraging walking and cycling, reducing reliance on private car use, integrating communities etc. All parties agree to work together and with other relevant stakeholders to address healthcare needs for new developments on a case by case basis. This could be through S106 negotiations and/or on-site delivery of new facilities where feasible.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf</a></p>
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<p>Policy CS19 – Provision of Health Services</p>	<p>Main issue 2: Paragraph 8.231; As participants in the Ipswich and East One Public Estate (OPE) the platform is available to make sure that all public buildings are fully utilised. Aside from OPE all of the local health partners meet as part of an Integrated Care System (ICS) and the re-use of sites no longer required by a provider is discussed and only after extensive study would a building be permitted for non-public uses.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26216)</p>	<p>Noted - IBC acknowledges that the Ipswich and East One Public Estate (OPE) platform is being developed and that an estate strategy for Ipswich is being prepared. Both parties agree to collaborate on the outcomes of this estate strategy in consultation with other relevant stakeholders as to how underutilised public buildings may be used for health facilities.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf</a></p>
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<p>Policy CS19 – Provision of Health Services</p>	<p>Main issue 3: Paragraph 8.232; The CCG does have plans and work is ongoing regarding provision of primary care in and around Ipswich. A number of feasibility studies are currently taking place with the goal of finding an estates strategy for Ipswich that covers the period of the plan.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26217)</p>	<p>Noted - IBC will continue to liaise with the CCG as per the draft Statement of Common Ground.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf</a></p>
<p>Policy CS19 – Provision of Health Services</p>	<p>Main issue 4: Policy as drafted is overly restrictive and inflexible. Fails to reflect legal or procedural requirements. Does not enable ESNEFT to realise its development requirements. Contrary to NPPF paragraph 35. Amendments needed and recommended.</p>	<p>East Suffolk &amp; North Essex NHS Foundation Trust (Rep ID: 26263)</p>	<p>Agree for the following reason:          - Whilst the Council does not agree to the amendments as originally proposed in this representation, the Council has liaised with the ESNEFT regarding a revised set of amendments to this policy through a draft Statement of Common Ground. The main modifications as proposed are set out in the draft SoCG.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf</a></p>

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<p>Policy CS19 – Provision of Health Services</p>	<p>Main issue 5: Last sentence of 8.229 requires deletion as it's beyond LPA remit. Additional wording needed to demonstrate other ancillary uses. Paragraph 8.230 requires amendment to link parking issues to those directly associated with proposed hospital activity. Amendments needed and recommended.</p>	<p>East Suffolk &amp; North Essex NHS Foundation Trust (Rep ID: 26264)</p>	<p>Agree for the following reason:          - Whilst the Council does not agree to the amendments as originally proposed in this representation, the Council has liaised with the ESNEFT regarding a revised set of amendments to this policy through a draft Statement of Common Ground. The main modifications as proposed are set out in the draft SoCG.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf</a></p>
<p>Policy CS20 – Key Transport Proposals</p>	<p>Main issue 1: Suggest addition of criteria (i) “improvements to the rail line” to policy CS20 to make it effective. This will enable matters such as the Ipswich to Cambridge rail line to remain a strategic priority.</p>	<p>West Suffolk (Forest Heath District Council and St Edmundsbury Borough Council) (Rep ID: 26291)</p>	<p>Disagree for the following reason:          - The Council has set out its support for improvement to the rail line in Policy ISPA2 (Strategic Infrastructure Priorities). It is considered that the wider strategic Policy ISPA2 is a more appropriate policy to set out this support rather than CS20 which is focussed on the immediate area of Ipswich.</p>	

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Policy CS20 – Key Transport Proposals	Main issue 2: Object to reference to requirement of road bridge to enable development at the Island Site. Not appropriate to be so prescriptive. Request removal of: “at a minimum, a road bridge from the west bank to the Island Site...will be required to enable any significant development on the Island”.	Associated British Ports (Rep ID: 26473)	Disagree for the following reasons: The development of the site is designed not to prejudice the wet dock crossing and indeed following the decision not to pursue the three Bridges scheme, SCC has reserved up to £10.8m to help secure it or something similar. It is important to have a vehicular access to the site to accommodate emergency vehicles should they ever be required and to ensure a link between the island site and the west bank.	
Policy CS20 – Key Transport Proposals	Main issue 3: Measures including A14 improvements and park and ride provision, are potentially feasible, however, funding is an issue as there is no certainty of future Highways England capital funding programme funding.	Highways England (Rep ID: 26601)	Agree for the following reasons: - IBC and SCC are in the process of agreeing a Statement of Common Ground which covers the matter of infrastructure in table 8A of the Local Plan Review, including A14 improvements. IBC agrees that a manage and monitor approach should be maintained in a similar manner to the Suffolk Coastal Local Plan examination which is also reliant on the delivery of the same A14 improvements.	
Policy CS20 – Key Transport Proposals	Main issue 4: Generally supportive of Policy CS20.	Highways England (Rep ID: 26589)	Noted - no modification required.	

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<p>Policy CS20 – Key Transport Proposals</p>	<p>Main issue 5: Transport is an area of weakness, and there is no evidence that Suffolk will provide any major infrastructure during Plan period. Therefore, all development will add to existing congestion with no reductions in carbon and increase in pollution and AQMAs. Makes Draft unsound on a fundamental level. Argument for no development until effective town wide mitigation strategy is in place.</p>	<p>Councillor Oliver Holmes (Rep ID: 26627)</p>	<p>Disagree for the following reason: Transport and air quality are important challenges for the Local Plan. This is a long established link and has been reiterated through the Air Quality Screening Report published to aid the air quality modelling. Transport modelling and air quality modelling has been undertaken for the Local Plan proposals, taking account of neighbouring areas' emerging Local Plans also. The transport modelling shows that there will be capacity issues in the Ipswich network by 2036 if no action is taken. Therefore Suffolk County Council has prepared an ISPA-wide Transport Mitigation Strategy, for which an action plan is currently being developed.</p>	
<p>Policy CS20 – Key Transport Proposals</p>	<p>Main issue 6: IBC is failing to Improve Access in breach of CS20. More needs to be done otherwise Modal Switch assumptions too high and unsound. CS is not justified with respect to Improving Access and Transport.</p>	<p>Save Our Country Spaces (Rep ID: 26365) Northern Fringe Protection Group (Rep ID: 26495)</p>	<p>Disagree for the following reasons: Action (further to the previous 'Travel Ipswich' improvements) is needed to encourage people to switch modes and this is in hand, for example through the development of the action plan to support the County's ISPA Transport Mitigation Strategy, and the preparation of a Local Cycling and Walking Infrastructure Plan (LCWIP). These aim to make walking, cycling and public transport use more attractive in Ipswich, e.g. through Quality Bus Partnerships and cycling infrastructure improvements. Mitigation of</p>	

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			<p>the transport issues within Ipswich has been identified through the ISPA Transport Mitigation Strategy as delivering modal shift in the order of 7% for new development and 9% for existing trips. The Strategy (Core Document reference D39) explains how the figures have been arrived at by the County Council.</p>	
<p>Policy CS20 – Key Transport Proposals</p>	<p>Main issue 7: Concerned that our comments on CS5 and CS20 in relation to the transport modelling and modal shift (and associated air quality issues) have not been adequately considered.</p>	<p>Save Our Country Spaces (Rep ID: 26365) Northern Fringe Protection Group (Rep ID: 26511)</p>	<p>Disagree for the following reason: The ISPA Transport Mitigation Strategy is actively addressing network capacity issues identified through the transport modelling for the Local Plan. Air quality is addressed through a new Local Plan Policy DM3.</p>	

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<p>Policy CS20 – Key Transport Proposals</p>	<p>Main issue 8: Disappointing that the Transport Mitigation Strategy and other relevant modal shift documents have not been included in the Evidence Base.</p>	<p>Save Our Country Spaces (Rep ID: 26365) Northern Fringe Protection Group (Rep ID: 26495) Suffolk County Council (Rep ID: 26574)</p>	<p>Noted: The Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area (August 2019) has now been uploaded as part of the Core Document Library on the Council's website to reflect this.</p>	
<p>Policy CS20 – Key Transport Proposals</p>	<p>Main issue 9: New infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary.</p>	<p>Save Our Country Spaces (Rep ID: 26365) Northern Fringe Protection Group (Rep ID: 26511)</p>	<p>Disagree for the following reasons: Transport infrastructure needs have been identified with Suffolk County Council as Highway Authority and outlined in Table 8A. Work is needed to encourage people to switch modes and this is in hand. ISPA authorities are developing an action plan to support the County's ISPA Transport Mitigation Strategy. Ipswich Borough Council is working with Suffolk County Council and others on the Local Cycling and Walking Infrastructure Plan (LCWIP). These two work strands aim to make walking, cycling and public transport use more attractive in Ipswich, e.g. through Quality Bus Partnerships and cycling infrastructure</p>	

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			<p>improvements. Mitigation of the transport issues within Ipswich has been identified through the ISPA Transport Mitigation Strategy as delivering modal shift in the order of 7% for new development and 9% for existing trips. The Strategy (Core Document reference D39) explains how the figures have been arrived at by the County Council.</p>	
<p>Policy CS20 – Key Transport Proposals</p>	<p>Main issue 10: See detailed comments on Transport Modelling and Mitigation Strategy (pages 26 - 32).</p>	<p>Save Our Country Spaces (Rep ID: 26365) Northern Fringe Protection Group (Rep ID: 26495)</p>	<p>Disagree for the following reason: The points raised in the representation are detailed questions about the assumptions underlying the traffic modelling for the ISPA Local Plans. The Highway Authority agreed the technical assumptions with WSP who provided the modelling and these are considered robust. The model is a tool to indicate where issues are likely to arise in the network and has informed the ISPA Transport Mitigation Strategy, as opposed to something more definitive.</p>	

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<p>Policy CS20 – Key Transport Proposals</p>	<p>Main issue 11: Paragraph 8.220 needs to be amended to read “Air Quality Management Areas are designated in areas where poor air quality will have an effect on people’s health”. Failure to recognise this undermines the soundness of the Plan.</p>	<p>Save Our Country Spaces (Rep ID: 26365) Northern Fringe Protection Group (Rep ID: 26495)</p>	<p>Disagree for the following reason: The text is now in re-numbered paragraph 8.241. The Council acknowledges the link between poor air quality and health effects and has responded by adding a new policy DM3 Air Quality to the plan. Therefore it does not fail to recognise this link.</p>	
<p>Policy CS20 – Key Transport Proposals</p>	<p>Main issue 12: IBC must explain why elected leader believes Ipswich cannot cope with existing volumes of traffic and that it's sound to increase traffic.</p>	<p>Northern Fringe Protection Group (Rep ID: 26511) Save Our Country Spaces (Rep ID: 26385)</p>	<p>Disagree for the following reasons: The Ipswich Northern Route proposal was not identified as needed to support the growth proposed through the Final Draft Local Plan, as set out in the ISPA SOCG section H2 (pg18). The transport network issues raised through the transport modelling are being addressed through the ISPA Transport Mitigation Strategy.</p>	

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<p>Policy CS20 – Key Transport Proposals</p>	<p>Main issue 13: Needs to recognise that SCC is concerned about traffic volume management and announced that it's establishing a taskforce to look at new ways of tackling the town's traffic.</p>	<p>Northern Fringe Protection Group (Rep ID: 26511) Save Our Country Spaces (Rep ID: 26385)</p>	<p>Disagree for the following reason: The policy is framed to support proposals needed to mitigate traffic impacts arising from planned growth and references the ISPA Transport Mitigation Strategy.</p>	
<p>Policy CS20 – Key Transport Proposals</p>	<p>Main issue 14: TUOC and Northern Route not proceeding.</p>	<p>Northern Fringe Protection Group (Rep ID: 26511) Save Our Country Spaces (Rep ID: 26385)</p>	<p>Disagree for the following reason: The Ipswich Northern Route proposal was not identified as needed to support the growth proposed through the Final Draft Local Plan, as set out in the ISPA SOCG section H2 (pg18). The transport network issues raised through the transport modelling are being addressed through the ISPA Transport Mitigation Strategy. CS20 refers only to two elements of the Upper Orwell Crossings Project which the Local Plan (adopted and emerging) refers to as the Wet Dock Crossing.</p>	

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Policy CS20 – Key Transport Proposals	Main issue 15: ISPA modelling needs to include additional highway schemes (see list).	Northern Fringe Protection Group (Rep ID: 26511) Save Our Country Spaces (Rep ID: 26385)	Disagree for the following reason: The points raised in the representation are detailed questions about the assumptions underlying the traffic modelling for the ISPA Local Plans. The Highway Authority agreed the technical assumptions with WSP who provided the modelling and these are considered robust. The model is a tool to indicate where issues are likely to arise in the network and has informed the ISPA Transport Mitigation Strategy as opposed to something more definitive.	
Policy CS20 – Key Transport Proposals	Main issue 16: Object to soundness. Object to reference to an Ipswich Northern Route, as this is no longer supported by Babergh and Mid Suffolk.	Babergh Mid Suffolk (Rep ID: 26462)	References to Ipswich Northern Route have been modified. Suffolk County Council announced the decision not to pursue the Northern Route after the Regulation 19 consultation meaning the plan and present situation are out of kilter. These changes form part of the draft Statement of Common Ground between the three authorities (see page 20 -21).	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a26_-_draft_statement_of_common_ground_with_bmsdc.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a26_-_draft_statement_of_common_ground_with_bmsdc.pdf</a>

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<p>Policy CS20 – Key Transport Proposals</p>	<p>Main issue 17: Object to soundness. Paragraph 8.240 needs to be amended to include reference to the respective local planning authorities agreeing the detailed measures, costings and a mechanism for collecting contributions for planned growth in respect of the Transport Mitigation Strategy, the current policy text only refers to agreement being sought through the ISPA Board.</p>	<p>Babergh Mid Suffolk (Rep ID:26461)</p>	<p>Agreed - see page 19 of the draft SoCG between the three authorities.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a26-draft_statement_of_common_ground_with_bmsdc.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a26-draft_statement_of_common_ground_with_bmsdc.pdf</a></p>
<p>Part C – Development Management Policies</p>	<p>Main issue 1: RSPB supports references to measures for swift conservation within DM policies and SPDs, particularly within DM8 and DM12.</p>	<p>RSPB (Rep ID: 26292)</p>	<p>Noted - no modification required.</p>	

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<p>Part C – Development Management Policies</p>	<p>Main issue 2: Plan not radical enough. Require change in modal shift and improved cycling and walking infrastructure. Rural bus services should be prioritised over park and ride schemes. Policy doesn't include references to reducing rat running on residential roads, increasing use of 20mph speed limits, or implementing protected cycle tracks. Proposals likely to have little effect on walking and cycling levels.</p>	<p>Cycle Ipswich (Rep ID: 26551)</p>	<p>Disagree for the following reason: The Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area (August 2019) is included in the Core Document Library on the Council's website. The strategy looks in more depth at ways to achieve modal shift and discusses cycling and walking infrastructure and bus services. Road infrastructure, speed limits and cycle lanes are the responsibility of Suffolk County Council.</p>	
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<p>Policy DM1 – Sustainable Construction</p>	<p>Main issue 1: Re-write Policy to take account of the national zero carbon target of 2050. Although carbon for new builds will be less than under previous standards, the level of emissions under this policy will still increase during the plan period. The default position should be zero carbon.</p>	<p>Councillor Oliver Holmes (Rep ID: 26628)</p>	<p>Disagree for the following reason: The vision, objectives and policies of the Local Plan Review are considered to reflect the national zero carbon target of 2050 and therefore it is not considered necessary to explicitly reference this.</p>	
<p>Policy DM1 – Sustainable Construction</p>	<p>Main issue 2: The Climate Emergency Declaration needs to be referenced.</p>	<p>Save Our Country Spaces (Rep ID: 26407) Northern Fringe Protection Group (Rep ID: 26526)</p>	<p>Disagree for the following reason: The vision, objectives and policies of the Local Plan Review are considered to reflect the wider Climate Emergency Declaration that Ipswich Borough Council has made and therefore it is not considered necessary to explicitly reference this.</p>	

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<p>Policy DM2 – Decentralised Renewable or Low Carbon Energy</p>	<p>Main issue 1: Policy should apply to all new builds. A 15% target is unlikely to be lawful under the net zero 2050 national objective and should be increased. Fails to consider national policy on prohibiting gas boilers after 2025. Extensions to residential property (including permitted development) will need to be compliant. Policy should make it clear that permission will be refused unless compliant.</p>	<p>Councillor Oliver Holmes (Rep ID: 26631)</p>	<p>Disagree for the following reason: - The 15% requirement is equivalent to the now defunct Code for Sustainable Homes Level 4. As a starting point for major developments, it is considered that this represents a reasonable level. This accounts for approximately 3% of BCIS build costs in the Whole Plan Viability Assessment which in comparison to other specific policy requirements such as RAMS (ISPA3), biodiversity net increase (DM8), accessible housing (DM12) and electric vehicle charging point (DM21) , is the highest development policy cost. Therefore, particularly given the viability challenges within the Borough, increasing this percentage could negatively impact the viability of development.</p>	
<p>Policy DM2 – Decentralised Renewable or Low Carbon Energy</p>	<p>Main issue 2: The Climate Emergency Declaration needs to be referenced.</p>	<p>Save Our Country Spaces (Rep ID: 26408) Northern Fringe Protection Group (Rep ID: 26527)</p>	<p>Disagree for the following reason: - The vision and objectives of the Local Plan Review are considered to reflect the wider Climate Emergency Declaration that Ipswich Borough Council has made and it is not necessary to explicitly reference this. The spatial option and strategy presented align with the Climate Emergency Declaration.</p>	

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<p>Policy DM3 – Air Quality</p>	<p>Main issue 1: Concern raised about a lack of sufficient investment and actions proposed in the plan to deliver the modal shift required to improve air quality and reduce carbon emissions in the town.</p>	<p>Clean Air Ipswich (Rep ID:26312)</p>	<p>Disagree for the following reasons: Modal shift is now being taken forward through the ISPA Transport Mitigation Strategy and Action Plan, and associated work such as the Local Cycling and Walking Infrastructure Strategy (which is supported by Government). The ISPA Transport Mitigation Strategy created through SCC provides clear sustainable options in relation to transport mitigation measures which are being development in light of the findings from the transport modelling and air quality modelling. Policy CS20 identifies sources of funding for transport mitigation measures. The ISPA Officer Group is also working to secure funding options to allow cross boundary mitigation measures related to sites which will have a transport impact on Ipswich.</p>	
<p>Policy DM3 – Air Quality</p>	<p>Main issue 2: Note IBC's air quality screening study which has considered growth across the ISPA. Council would note that there are potential linkages with the mitigation outlined to deliver modal shift through an ISPA transport mitigation strategy.</p>	<p>East Suffolk Council (Rep ID: 26421)</p>	<p>Noted - no modification required.</p>	

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<p>Policy DM3 – Air Quality</p>	<p>Main issue 3: Poor air quality in AQMAs is a result of road traffic. Mitigation needs to include restriction on operational parking in commercial development. All new residential development needs to include significant contributions towards sustainable transport options. Increase in emissions in AQMAs and further AQMAs declared during the plan period cannot be allowed.</p>	<p>Councillor Oliver Holmes (Rep ID: 26633)</p>	<p>Disagree for the following reasons: Agree that road traffic is the cause of air quality management areas being declared in Ipswich. This is a long-established link and has been reiterated through the Air Quality Screening Report published to aid the air quality modelling. Operational parking is addressed through policy DM22 Car and Cycle Parking in New Development which limits non-residential car parking provision within the Central Car Parking Core to meeting operational parking needs only (e.g. deliveries, but not general staff parking). Sustainable transport measures are being developed through the ISPA Transport Mitigation Strategy which is supported through policy CS20.</p>	
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<p>Policy DM3 – Air Quality</p>	<p>Main issue 4: Transport Modelling includes challenging modal shift assumptions. Unless evidence of funding and plans to improve the ineffective cycling network provided, the levels of modal shift unreachable. Contrary to NPPF 181. CS needs to make clear commitment to improving air quality and compliance with legally binding air pollution targets. Fails to follow Government's guidelines and waters down Government requirements. Flaws in WSP Source Apportionment Study. New modelling needs to address issues and focus on air quality in first 10 years.</p>	<p>Save Our Country Spaces (Rep ID: 26414) Northern Fringe Protection Group (Rep ID: 26530)</p>	<p>Disagree for the following reason: The ISPA Transport Mitigation Strategy (Core Document reference D39) explains how the modal shift figures have been arrived at. The Local Plan together with the Council's Air Quality Action Plan set out an approach to tackle air quality issues through new development and non-land use based measures. Work is underway on the development of an action plan to support the County's ISPA Transport Mitigation Strategy, and the preparation of a Local Cycling and Walking Infrastructure Plan (LCWIP). These aim to make walking, cycling and public transport use more attractive to residents and commuters in Ipswich, e.g. through Quality Bus Partnerships and cycling infrastructure improvements. At the Suffolk County Council cabinet meeting on the 16 June 2020, a recommendation was endorsed to develop the LCWIP for the Ipswich area. The link to the cabinet page is here <a href="https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(16-06-2020),%20The%20Cabinet">https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(16-06-2020),%20The%20Cabinet</a>. Policy DM3 Air Quality makes clear the Council's commitment to improving air quality and seeks to ensure that the impact of development on air quality is mitigated. The Council takes air quality very seriously. It has an active air quality group across the Council, it is producing a Low Emissions SPD and improving the air quality in Ipswich is a major objective.</p>	
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Policy DM3 – Air Quality	Main issue 5: No Air Quality Assessment provided as part of this consultation, unacceptable. Reserve right to comment on this.	Save Our Country Spaces (Rep ID: 26414) Northern Fringe Protection Group (Rep ID: 26530)	Disagree for the following reasons: Air quality modelling was published in 2016. It has been updated as part of the Local Plan review. An air quality screening report was published in January 2020 and the full modelling has subsequently been completed and published. The updated modelling has now been added to the Core Document Library. Therefore, this will be available for statement preparation. The findings of the updated air quality work were subject to assessment through HRA and SA.	
Policy DM3 – Air Quality	Main issue 6: No Air Quality Assessment for IGS.	Save Our Country Spaces (Rep ID: 26414) Northern Fringe Protection Group (Rep ID: 26530)	Disagree for the following reason: The plan has been subject to air quality modelling (Core Document reference D33) and the Ipswich Garden Suburb planning applications were accompanied by detailed traffic assessments and mitigation and air quality assessments which were assessed as part of the determination of the applications.	

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<p>Policy DM4 – Development and Flood Risk</p>	<p>Main issue 1: At present, we are raising an unsound representation on Flood Risk grounds. This is because the evidence base that informs the Local Plan is not yet finalised. The SFRA has not yet been agreed as the River Gipping fluvial model is not yet verified and ready for use. A statement of common ground will be prepared if required and will continue to work in partnership with IBC on the SFRA. Paragraph 9.4.10 needs to make reference to the SFRA as a living document.</p>	<p>Environment Agency (Rep ID: 26279)</p>	<p>Agreed - see signed Statement of Common Ground between the EA and IBC.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a19_-_environment_agency_signed_statement_of_common_ground.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a19_-_environment_agency_signed_statement_of_common_ground.pdf</a></p>
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<p>Policy DM4 – Development and Flood Risk</p>	<p>Main issue 2: The current situation regarding flood risk assessment within the CS is ambiguous and somewhat confused. This needs to be clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be sound and understood by residents. (see image of better map to illustrate.)</p>	<p>Save Our Country Spaces (Rep ID: 26372) Northern Fringe Protection Group (Rep ID: 26500)</p>	<p>Disagree for the following reason: the flood risk evidence for the Local Plan (Strategic Flood Risk Assessment Core Document reference D29 and appendices) is up to date other than in awaiting the findings of the new Gipping Model from the Environment Agency. This is addressed through a statement of common ground between the Council and the Environment Agency (Core Document reference A19). Tidal risk is now greatly reduced following the completion of the tidal barrier in February 2019.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a19_environment_agency_signed_statement_of_common_ground.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a19_environment_agency_signed_statement_of_common_ground.pdf</a></p>
<p>Policy DM4 – Development and Flood Risk</p>	<p>Main issue 3: Delete 'where practicable' from DM4 clause a). Continue work on emerging SFRA.</p>	<p>Suffolk County Council (Rep ID: 26593)</p>	<p>Agree - This has been reflected in the draft Statement of Common Ground between IBC and SCC and the words "where practicable" removed. The Council have continued to work with Suffolk County Council on the emerging SFRA which is now available on the Core Document Library.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_ibc_scc_infrastructure_socg.pdf</a></p>

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Policy DM5 – Protection of Open Spaces, Sport and Recreation	Main issue 1: The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26218)	Noted - no modification required.	
Policy DM5 – Protection of Open Spaces, Sport and Recreation	Main issue 2: Support the revisions to the policy based on comments raised at Preferred Options.	Sport England (Rep ID: 26281)	Noted - no modification required.	
Policy DM6 – Provision of New Open Spaces, Sport and Recreation Facilities	Main issue 1: The policy is supported.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26219)	Noted - no modification required.	

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<p>Policy DM6 – Provision of New Open Spaces, Sport and Recreation Facilities</p>	<p>Main issue 2: In order for the Plan to be sound there should be an explicit recognition that, on higher density, previously developed sites in the IP-One Area, and particularly on the Waterfront, it will not be possible to make full provision for open space in accordance with the Council's standards.</p>	<p>Cardinal Lofts (Mill) Ltd) (Rep ID: 26560)</p>	<p>Disagree for the following reasons: The policy is suitably flexible as it states: 'There will be a preference for on-site provision where practicable, however off-site contributions may be appropriate depending on the size of the site and the level of existing provision within its walking catchment.'</p>	
<p>Policy DM7 – Provision of Private Outdoor Amenity Space in New and Existing Developments</p>	<p>Main issue 1: In order for the Plan to be sound there should be an explicit recognition that, in respect of high density, previously developed sites, it may not always be possible to make full provision for private amenity space to accord with the Council's standards.</p>	<p>Cardinal Lofts (Mill) Ltd) (Rep ID: 26561)</p>	<p>Disagree for the following reasons: The policy is suitably flexible as it contains this clause: 'Should this requirement unavoidably conflict with the need to meet other density and urban design requirements of the plan or an applicant is able to demonstrate that a lower figure would be acceptable having regard to the particular circumstances of the proposals the Council will expect applicants to demonstrate that adequate provision of private outdoor amenity space will be provided for the occupants of the proposed dwellings.'</p>	

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<p>Policy DM7 – Provision of Private Outdoor Amenity Space in New and Existing Developments</p>	<p>Main issue 2: The policy is unsound as is not consistent with national policy or justified. The policy is too prescriptive, Ipswich is highly constrained. To meet Ipswich’s housing requirement more flexibility is required.</p>	<p>Home Builders Federation (Rep ID: 26299)</p>	<p>Disagree for the following reasons: There are no national minimum standards for private outdoor amenity space, however, the National Design Guide states that well-designed homes and buildings ‘provide internal environments and associated external spaces that support the health and wellbeing of their users and all who experience them.’ It is vital that we ensure new developments have appropriate outdoor space for the health and welfare for current and future users. The policy is suitably flexible as it allows for lower provision if the requirement unavoidably conflicts with the need to meet other density and urban design requirements of the plan.</p>	
<p>Policy DM7 – Provision of Private Outdoor Amenity Space in New and Existing Developments</p>	<p>Main issue 3: Minimum standard areas for private outdoor amenity space are not adequately justified and are not consistent with national policy. Persimmon also endorse the statements made by the HBF.</p>	<p>Persimmon Homes (Rep ID: 26428)</p>	<p>Disagree for the following reasons: There are no national minimum standards for private outdoor amenity space, however, the National Design Guide states that well-designed homes and buildings ‘provide internal environments and associated external spaces that support the health and wellbeing of their users and all who experience them.’ It is vital that we ensure new developments have appropriate outdoor space for the health and welfare for current and future users. The policy is suitably flexible as it allows for lower provision if the requirement unavoidably conflicts with the need to meet other density and urban design requirements of the plan.</p>	

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Policy DM8 – The Natural Environment	Main issue 1: Support objectives of policy.	AONB Unit (Rep ID: 26254)	Noted - no modification required.	
Policy DM8 – The Natural Environment	Main issue 2: European Protected Sites are now called Habitats Sites and policy needs to be amended accordingly.	AONB Unit (Rep ID: 26254)	The amended Habitat Regulations still refer to these sites as European Protected Sites. The Council will review the situation when the 2020 Environment Bill is enacted.	
Policy DM8 – The Natural Environment	Main issue 3: Consultation module title for DM8 incorrect.	AONB Unit (Rep ID: 26256)	Noted - no modification required. This refers to the consultation module on JDi rather than the actual Local Plan document. The consultation has now closed and as such this does not need updating.	

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<p>Policy DM8 – The Natural Environment</p>	<p>Main issue 4: Support policy and approach. However, equivalent policy within the Suffolk Coastal Final Draft Local Plan refers to the RAMS, and as such provides a development management policy approach to implementing the strategy which has been worked up on a cross-boundary basis. To be effective, DM8 could be strengthened through reference to securing contributions to facilitate the implementation of the strategy.</p>	<p>East Suffolk Council (Rep ID: 26422)</p>	<p>Agreed - see signed SoCG between the two Councils.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_statement_of_common_ground_with_east_suffolk_council_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a25_statement_of_common_ground_with_east_suffolk_council_0.pdf</a></p>
<p>Policy DM8 – The Natural Environment</p>	<p>Main issue 5: Delete conditions a. and c. to reflect NPPF paragraph 175b which only allows for benefits outweighing impacts.</p>	<p>Suffolk Wildlife Trust (Rep ID: 26317)</p>	<p>Disagree for the following reasons: This is the approach we have taken in the Adopted Local Plan. Indeed, conditions a-c of the policy go further than the NPPF requires. This reflects the small number of SSSIs within the Borough and reflects the wider Biodiversity Duty.</p>	<p>-</p>

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<p>Policy DM8 – The Natural Environment</p>	<p>Main issue 6: Existing green rim is an asset and should be protected by adding it to CS4, especially as IBC have previously massively reduced its size and are now attempting to reclassify it and destroy it. Not clear what RAMS S106 payments agreed with CBRE and Crest sites as S106 are not publicly available. If no RAMS tariffs included in the S106 agreements this could be in breach of this SPD and policies CS4, CS17 and Policy DM31 of the adopted CS. New CS would be unsound in relation to CS4 CS17 and DM8 as no means of funding the required.</p>	<p>Save Our Country Spaces (Rep ID: 26409) Northern Fringe Protection Group (Rep ID: 26529)</p>	<p>Disagree for the following reason: The purpose of the green trail remains the same as the green rim as described in the adopted Local Plan. The reason for the name change was because it was brought to the attention of officers that the name "green rim" may falsely give the impression that this land is a de-facto green belt and purely restrictive in purpose. The green rim was established as a green infrastructure concept as an ecological and recreational/ accessible corridor and was designated as such to ensure that any development incorporates sufficient links to this corridor. The term "green trail" was considered to be a more accurate name which encompasses both the biodiversity and active travel functions. The section 106 planning agreements are available to view on the Council's website <a href="https://www.ipswich.gov.uk/content/planning-application-ip1600608out-april-2018-update">https://www.ipswich.gov.uk/content/planning-application-ip1600608out-april-2018-update</a> and <a href="https://www.ipswich.gov.uk/content/planning-application-ip1400638outfl-april-2018-update">https://www.ipswich.gov.uk/content/planning-application-ip1400638outfl-april-2018-update</a>. The HRA requirements for applications 14/00638/OUTFL and 16/00608/OUT have been secured through planning conditions and S106 Obligations. For the recreational pressure of the development alone a financial contribution towards the delivery of a Country Park on the IGS and on-site public open space is required; for the in-</p>	
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			combination effects, a RAMS contribution of £7,500 per application.	
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<p>Policy DM10 – Green Corridors</p>	<p>Main issue 1: The Green Corridors identified are not interlinked and there is no coherent walking/ cycling route.</p>	<p>Andrea McDonald (Rep ID: 26202)</p>	<p>Disagree for the following reasons: - The green corridors are indicative routes showing how green arterial routes into and out of the town may be achieved. The linking of these routes will come down to detailed cycle/ walking improvements that Suffolk County Council as the Highway Authority will need to consider in any future highway improvement plans. The purpose of this policy is to ensure that individual developments on or immediately adjacent to these green corridors take account of the goal of creating these green routes and do not compromise the ability to deliver these in the future.</p>	
<p>Policy DM10 – Green Corridors</p>	<p>Main issue 2: Green Corridor F could be extended beyond what is shown. See suggested route. Two of the sites (IP143 and IP067b) make up a substantial part of Green Corridor F. If these sites are fully developed, this ecological network would be interrupted.</p>	<p>Suffolk Wildlife Trust (Rep ID: 26326)</p>	<p>Disagree for the following reason: Site IP143 has outline planning permission (17/00769/OUT) and this includes an ecological assessment and appropriate surveys. Sites IP067b, IP150b - e and IP152 (the suggested amended route) are identified on Plan 5 (Ipswich Ecological Network) as potential development sites with wildlife interest and/or within the identified buffer zone of the green corridor. The site sheets for these sites also highlight the need for biodiversity enhancement, mitigation and appropriate surveys which by virtue will require consideration of links to adjoining wildlife sites and sites of interest.</p>	

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<p>Policy DM10 – Green Corridors</p>	<p>Main issue 3: Object to change from green rim to green trail as this is misleading and is to allow development at Humber Doucy Lane.</p>	<p>Save Our Country Spaces (Rep ID: 26351) Northern Fringe Protection Group (Rep ID: 26519)</p>	<p>Disagree for the following reasons: The purpose of the green trail remains the same as the green rim as described in the adopted Local Plan. The reason for the name change was because it was brought to the attention of officers that the name "green rim" may falsely give the impression that this land is a de-facto green belt and purely restrictive in purpose. The green rim was established as a green infrastructure concept as an ecological and recreational/ accessible corridor and was designated as such to ensure that any development incorporates sufficient links to this corridor. The term "green trail" was considered to be a more accurate name which encompasses both the biodiversity and active travel functions.</p>	
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<p>Policy DM10 – Green Corridors</p>	<p>Main issue 4: Tuddenham Road/Westerfield green corridors are home to significant number of recorded protected species (great crested newts, badgers, hedgehogs, bats and all manner of species) as well as birds, flora/ fauna; Southern Marsh and bee orchids found on the Fynn Valley and adjacent area. Due to private ownership, there is little interest for formal surveys due to landowners aspirations for land use. SWT done some work within Red House Ipswich, the Fynn Valley CWS; a Hedgerow Survey of the whole IGS area completed. Active badger sets reported.</p>	<p>Save Our Country Spaces (Rep ID: 26351) Northern Fringe Protection Group (Rep ID: 26519)</p>	<p>Noted. Policy DM8 The Natural Environment provides the framework for considering natural proposed. Plan 5 Ecological Network also identifies sites with high, medium and low conservation value. The planning permissions, 14/00638/OUTFL and 16/00608/OUT, for the Ipswich Garden Suburb include a requirement for ecology strategies to be prepared.</p>	
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Policy DM11 – Countryside	Main issue 1: The policy does not relate to development within the setting of the AONB and requires amendment to acknowledge this.	Suffolk Preservation Society (Rep ID: 26244)	Agree for the following reasons: The policy is compliant with guidance from the NPPF regarding development within the AONB, however, we will add additional text to paragraph 9.11.3 to reflect appropriate consideration of the AONB setting.	<a href="#">See DM11 Countryside</a>
Policy DM11 – Countryside	Main issue 2: Change to policy requested at Preferred Options undertaken and supported.	AONB Unit (Rep ID: 26255)	Noted - no modification required.	
Policy DM12 – Design and Character	Main issue 1: Support policy as it promotes multi-functional uses.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26220)	Noted - no modification required.	

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Policy DM12 – Design and Character	Main issue 2: Welcome the importance attached to open spaces.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26220)	Noted - No modification required.	
Policy DM12 – Design and Character	Main issue 3: Support the revisions to the policy based on comments raised at Preferred Options.	Sport England (Rep ID: 26282)	Noted - no modification required.	
Policy DM12 – Design and Character	Main issue 3: Support the accessibility standard M4(2) but 'waiver' wording needs to be firmer and the policy should include a requirement for 10% M4(3) wheelchair accessible housing.	Habinteg Housing Association (Rep ID: 26272)	Disagree for the following reasons: The 'waiver' clause within the policy is included to provide flexibility where the requirement for M4(2) housing would render the development unviable. There are many factors which could affect this (circumstances of the proposal, site or other planning consideration) and as such it would be inappropriate to make the 'waiver' more prescriptive here.	

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<p>Policy DM12 – Design and Character</p>	<p>Main issue 4: Support desire for new development to be well designed and sustainable, for 25% of new dwellings to be built to Building Regulations standard M4(2), and for proposals to respect the character and distinctiveness of Ipswich, however, this should not be at the expense of development viability. Policy should be applied flexibly in the context of the objective to achieve sustainable regeneration.</p>	<p>Associated British Ports (Rep ID: 26474)</p>	<p>Noted - no modification required. The policy contains a clause to provide flexibility on this requirement should it affect viability: 'The Council will consider waiving or reducing the requirement where the circumstances of the proposal, site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable.'</p>	
<p>Policy DM12 – Design and Character</p>	<p>Main issue 5: Point d. there should be an inclusion of the potential for installation of green roofs and walls as part of the strategy to introduce greener streets and spaces.</p>	<p>Suffolk Wildlife Trust (Rep ID: 26318)</p>	<p>Disagree for the following reasons: Point d. of Policy DM12 suggests that development design and layout should 'introduce greener streets and spaces to contribute to local biodiversity net gain, visual amenity, and health and well-being, and offset the impacts of climate change'. There are numerous ways that this could be achieved and it is unnecessary to be prescriptive here as this is covered elsewhere. Paragraph 9.12.19 goes on to provide more depth to the policy by suggesting that urban greening 'could include the incorporation of canopy cover, green walls</p>	

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			and green roofs and the creation of urban greenspace, as part of soft landscaping considerations.'	
Policy DM12 – Design and Character	Main issue 6: No justification has been provided for the need for 25% of all housing on major developments to be designed to Part M4(2). Figure could be too high. Persimmon also endorse the statements made by the HBF.	Persimmon Homes (Rep ID: 26430)	Noted: The 2017 adopted Local Plan contains this approach which was accepted by the Inspector. The approach is based on currently available census data.	

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Policy DM13 – Built Heritage and Conservation	Main issue 1: Object to reference of “the withdrawal of permitted development rights where they present a threat to the protection of the character and special interest of the conservation area”. Strongly resist any steps to withdraw permitted development rights. If this does not encompass rights enjoyed by ABP, specific clarification should be included.	Associated British Ports (Rep ID: 26475)	Disagree for the following reason: The removal of permitted development (PD) rights is a standard tool for ensuring that key changes that could otherwise be made can't be made without the express notification to the local planning authority, under an Article 4 Direction in sensitive locations. Consideration of what is appropriate will form part of the Conservation Area Management Appraisals which are in the process of being updated by the Conservation Team.	
Policy DM13 – Built Heritage and Conservation	Main issue 2: Generally supportive of objectives set out in Policy DM13 and satisfied with revised wording.	Cardinal Lofts (Mill Ltd) (Rep ID: 26562)	Noted: no modification required.	
Policy DM13 – Built Heritage and Conservation	Main issue 3: We strongly object to the re-designation of the Ipswich “green rim” to “green trails”. This is in breach of DM13 and unsound.	Save Our Country Spaces (Rep ID: 26372) Northern Fringe Protection Group (Rep ID: 26499)	Disagree for the following reasons: The purpose of the green trail remains the same as the green rim as described in the adopted Local Plan. The reason for the name change was because it was brought to the attention of officers that the name "green rim" may falsely give the impression that this land is a de-facto green belt and purely restrictive in purpose. The green rim was established as a green infrastructure concept as an ecological and recreational/ accessible corridor and was	

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			designated as such to ensure that any development incorporates sufficient links to this corridor. The term "green trail" was considered to be a more accurate name which encompasses both the biodiversity and active travel functions.	
Policy DM13 – Built Heritage and Conservation	Main issue 4: Note the changes to this policy following our Regulation 18 advice.	Historic England (Rep ID: 26668)	Noted: no modification required.	
Policy DM14 – Archaeology	Main issue 1: Welcome the changes to this policy following our Regulation 18 advice.	Historic England (Rep ID: 26669)	Noted: no modification required.	

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<p>Policy DM15 – Tall Buildings</p>	<p>Main issue 1: The RSPB believes that the failure to include their suggestion regarding integrated swift bricks within Policy DM15 could constitute a failure in the Council's 'Duty to conserve biodiversity' under Section 40 of the Natural Environment and Rural Communities Act.</p>	<p>RSPB (Rep ID: 26294)</p>	<p>Disagree for the following reasons: The Council support the addition of integrated swift bricks however have chosen to refer to them within policies DM8 (The Natural Environment) and DM12 (Design and Character). Policy DM12 reads 'Provision to support biodiversity net gain should include measures such as nestboxes for birds (swifts, house sparrows, starlings) and bat boxes integrated into the fabric of the building.' This means the Council has taken a broader approach than just applying it to taller buildings.</p>	
<p>Policy DM15 – Tall Buildings</p>	<p>Main issue 2: Object to exclusion of IP035 from the 'arc of land', where tall buildings may be appropriate, as shown on IP-One Area Inset Proposals Map. Costs of developing IP035 are such that high-density development, potentially involving 'tall buildings', will be required.</p>	<p>Cardinal Lofts (Mill Ltd) (Rep ID: 26563)</p>	<p>Disagree for the following reasons: IP035 is a highly sensitive site located within close proximity to two listed churches and Wolsey's Gate is a scheduled monument. As such it is not considered suitable for inclusion within the tall buildings arc. This approach is supported by Historic England.</p>	

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<p>Policy DM15 – Tall Buildings</p>	<p>Main issue 3: A criterion K should be added, as requested by RSPB previously, to incorporate integrated swift boxes to help meet the biodiversity net gain requirements.</p>	<p>Suffolk Wildlife Trust (Rep ID: 26320)</p>	<p>Disagree for the following reasons: The Council support the addition of integrated swift bricks however have chosen to refer to them within policies DM8 (The Natural Environment) and DM12 (Design and Character). Policy DM12 reads 'Provision to support biodiversity net gain should include measures such as nestboxes for birds (swifts, house sparrows, starlings) and bat boxes integrated into the fabric of the building.' This means the Council has taken a broader approach than just applying it to taller buildings.</p>	
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<p>Policy DM15 – Tall Buildings</p>	<p>Main issue 4: Support changes to Policy DM15, but request criterion ‘i’ is amended. Remain concerned that the tall building arc still includes a significant area within the setting of the Grade I Listed Willis Building. One of its most striking features is its curvilinear glass curtain walling that reflects the surrounding buildings. Any new tall building therefore has the potential to impact on the setting, and therefore significance of this important building, and on this basis, we advise pulling back the arc boundary in the immediate vicinity. Our Tall buildings advice note provides more information.</p>	<p>Historic England (Rep ID: 26667)</p>	<p>Agreed: The Council shares Historic England's desire to protect the setting and significance of the towns most important buildings. As such the Council has sought to amend the tall buildings arc, pulling it away from the Willis building and the churchyards of St Peters, St Marys at the Quay and St Nicholas. In addition the Council have sought to amend criterion 'i' to include reference to the settings of conservation areas and scheduled monuments. This is being addressed through the draft Statement of Common Ground.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27_-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27_-draft_statement_of_common_ground_he_0.pdf</a></p>
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<p>Policy DM16 – Extensions to Dwellings and the Provision of Ancillary Buildings</p>	<p>Main issue 1: Policy needs to include a reference to zero carbon to take account of the national zero carbon target of 2050.</p>	<p>Councillor Oliver Holmes (Rep ID: 26634)</p>	<p>Disagree for the following reasons: The Council require through policy DM1 and DM2 for major developments to provide high levels of energy efficiency equivalent to the now defunct Code 4 of Sustainable Homes.</p>	
<p>Policy DM17 – Small Scale Infill and Backland Residential Developments</p>	<p>Main issue 1: A point should also be made to deny permission for any development which could result in an unacceptable loss of semi-natural habitat, which could be important in its own right, or support protected and/or priority species.</p>	<p>Suffolk Wildlife Trust (Rep ID: 26575)</p>	<p>Disagree for the following reasons: Development affecting priority species is covered in Policy DM8 which states that 'development which could harm, directly or indirectly, species, which are legally protected, or species and habitats that have been identified as Species or Habitats of Principal Importance in England (also known as Section 41 or 'Priority' species and habitats) will not be permitted unless the harm can be avoided or mitigated by appropriate measures.' Loss of a habitat which is supporting a priority species could be considered an indirect affect from a new development and therefore the development would not be permitted unless harm could be avoided or mitigated.</p>	

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Policy DM18 – Amenity	Main issue 1: Policy does not cite recognised technical guidance on overlooking, which would help to provide continuity in the assessment of the issue. Persimmon also endorse the statements made by the HBF.	Persimmon Homes (Rep ID: 26429)	Disagree for the following reasons: The Council expects development to be designed to protect the privacy of occupants and advises that applications will be assessed on a case by case basis. This complies with the NPPF (para. 127) requirement to create places with a high standard of amenity for existing and future users.	
Policy DM20 – Houses in Multiple Occupation	Main issue 1: Support.	Save Our Country Spaces (Rep ID: 26480) Northern Fringe Protection Group (Rep ID: 26537)	Noted - no modification required.	
Policy DM21 – Transport and Access in New Developments	Main issue 1: Would prefer the requirement for electric vehicle charging points to be implemented through the Building Regulations rather than through local planning policy.	Home Builders Federation (Rep ID: 26295)	Disagree for the following reason: The Council considers it important for air quality reasons to facilitate the switch to electric vehicles and the cost has been factored in through the Whole Plan Viability Assessment (Core Document reference D42).	

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<p>Policy DM21 – Transport and Access in New Developments</p>	<p>Main issue 2: Policy lacks clarity, it does not state the amount of charging point and the type of provision sought. The requirement should be evidenced with regard to the technical feasibility and financial viability.</p>	<p>Home Builders Federation (Rep ID: 26355)</p>	<p>Disagree for the following reason: the Whole Plan Viability Assessment (Core Document D42) included a cost for EV charging provision of £976 per dwelling based on Electric Vehicle Charging in Residential and Non Residential Buildings, July 2019. Some guidance is provided through the Suffolk Guidance for Parking (Core Document reference H7).</p>	
<p>Policy DM21 – Transport and Access in New Developments</p>	<p>Main issue 3: Object to removal criterion a. Specifically; “rights of way or the local road network in respect of traffic capacity” must be reinstated as walking/ cycling shouldn't be reduced as traffic congestion is a major problem and local new developments shouldn't negatively impact. Changes conflict with CS5.</p>	<p>Save Our Country Spaces (Rep ID: 26481) Northern Fringe Protection Group (Rep ID: 26538)</p>	<p>Disagree for the following reason: Public rights of way have been given more prominence in the policy through a separate clause, g. . Clause e. also prioritises sustainable travel options. The Council considers the policy has been strengthened, not weakened.</p>	

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<p>Policy DM21 – Transport and Access in New Developments</p>	<p>Main issue 4: Support change regarding highway safety (criterion B). However IGS is non-compliant as failed to assess impacts of development on air quality. Revised assessment of air quality impacts of IGS urgently required before commencement.</p>	<p>Save Our Country Spaces (Rep ID: 26481) Northern Fringe Protection Group (Rep ID: 26538)</p>	<p>Support noted. Disagree for the following reason regarding air quality: The plan has been subject to air quality modelling (Core Document reference D33) and the Ipswich Garden Suburb planning applications were accompanied by detailed traffic assessments and mitigation and air quality assessments which were assessed as part of the determination of the applications.</p>	
<p>Policy DM21 – Transport and Access in New Developments</p>	<p>Main issue 5: Unclear how 'severe' and 'significant' impacts defined. Maximum legal limits for particulates and nitrous oxides, and this should be 'significant'.</p>	<p>Save Our Country Spaces (Rep ID: 26481) Northern Fringe Protection Group (Rep ID: 26538)</p>	<p>Disagree for the following reason: The wording of clause a. has been amended to align more closely with the NPPF (e.g. paragraph 109).</p>	

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<p>Policy DM21 – Transport and Access in New Developments</p>	<p>Main issue 6: Whilst no objections are raised in respect of the majority of the provisions of this policy, we are concerned that a requirement that all new development should have access to public transport within 400m is neither justified (in terms of its being a fixed requirement) nor likely to mean that the Plan is effective overall in delivering the number of new homes required, because there are some locations where a strict adherence to 400m is unlikely to be achievable. Please see full representation text for proposed changes.</p>	<p>Mersea Homes (Phase 2 Planning and Development Ltd) (Rep ID: 26307)</p>	<p>Disagree for the following reason: The requirement is well established through the adopted Local Plan and a key element of the approach to sustainable transport. Ipswich has a good network of bus routes. The supporting text does allow for some flexibility in implementing this clause of the policy (paragraph 9.21.5). However, the text refers in error to clause e. instead of clause f. Therefore it is suggested that this be corrected through a minor modification.</p>	<p><a href="#">See Minor changes Reg 19 to Reg 22</a></p>
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Policy DM21 – Transport and Access in New Developments	Main issue 7: Travel plan references need updating and thresholds aligning with SCC Guidance.	Suffolk County Council (Rep ID: 26576)	Agree - These modifications have been reflected in the draft Statement of Common Ground between IBC and SCC.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a29_ibc_scc_transport_and_parking_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a29_ibc_scc_transport_and_parking_socg.pdf</a>
Policy DM21 – Transport and Access in New Developments	Main issue 8: The HBF would prefer the requirement for electric vehicle charging points to be implemented through the Building Regulations.	Home Builders Federation (Rep ID: 26295)	Disagree for the following reason: The Council considers it important for air quality reasons to facilitate the switch to electric vehicles and the cost has been factored in through the Whole Plan Viability Assessment (Core Document reference D42).	
Policy DM21 – Transport and Access in New Developments	Main issue 9: Part c is unsound and has not been justified. Policy lacks clarity, it does not state the amount of charging point and the type of provision sought. The requirement should be evidenced with regard to the technical feasibility and financial viability.	Home Builders Federation (Rep ID: 26295)	Disagree for the following reason: The Whole Plan Viability Assessment (Core Document D42) included a cost for EV charging provision of £976 per dwelling based on Electric Vehicle Charging in Residential and Non Residential Buildings, July 2019. Some guidance is provided through the Suffolk Guidance for Parking (Core Document reference H7). Paragraph 9.21.7 states that further information will be provided through the Low Emissions Strategy Supplementary Planning Document which is in preparation.	

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<p>Policy DM22 – Car and Cycle Parking in New Development (PLEASE NOTE THIS SHOULD BE DM23 - The Density of Residential Development)</p>	<p>Main issue 1: Support IBC's qualification that it will not insist on the requirement to meet Nationally Described Space Standards if this is demonstrated to be unviable in specific cases.</p>	<p>Associated British Ports (Rep ID: 26476)</p>	<p>Noted - no modification required.</p>	
<p>Policy DM22 – Car and Cycle Parking in New Development</p>	<p>Main issue 2: Generally supportive of Policy. Welcome recognition that many people still own cars and that adequate levels of residential parking needs to be provided as part of new residential schemes.</p>	<p>Cardinal Lofts (Mill Ltd) (Rep ID: 26564)</p>	<p>Noted - no modification required.</p>	
<p>Policy DM22 – Car and Cycle Parking in New Development</p>	<p>Main issue 3: Extend the Central Car Parking Core to the whole of IP-One. Provide more examples of operational car parking.</p>	<p>Suffolk County Council (Rep ID: 26584)</p>	<p>Disagree for the following reasons: IP-One covers a bigger area than just the town centre, therefore, the Central Car Parking Core approach would not be appropriate for the whole of the IP-One area. However, changes are being agreed with the County Council which include removing all long term on-street car parking within the IP-One area.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a29_-_ibc_scc_transport_and_parking_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a29_-_ibc_scc_transport_and_parking_socg.pdf</a></p>

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<p>Policy DM22 – Car and Cycle Parking in New Development</p>	<p>Main issue 4: Policy is unsound as it is not consistent with national policy. Required standards for car and cycle parking are not set out in the policy.</p>	<p>Home Builders Federation (Rep ID: 26293)</p>	<p>Disagree for the following reason: The parking standards for all but central Ipswich (IP-One area) are set out in the Suffolk Guidance for Parking. The approach to parking in development within the IP-One area will be addressed through the Low Emissions Strategy SPD currently in preparation. This will be published for public consultation in due course. Including the guidance within the Local Plan would introduce an inappropriate level of detail.</p>	
<p>Policy DM23 – The Density of Residential Development</p>	<p>Main issue 1: Generally supportive of Policy. Welcome support for high densities of residential development in the Portman Quarter and Waterfront areas.</p>	<p>Cardinal Lofts (Mill) Ltd) (Rep ID: 26565)</p>	<p>Noted - no modification required.</p>	

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<p>Policy DM23 – The Density of Residential Development</p>	<p>Main issue 2: Part (c) of the policy as drafted would not be effective as there is no practical means for ensuring an average of 35 dph across multiple sites, and no justification for stipulating 35 dph on any particular individual site, and no justification for "low-density development" per se. Please see full representation text for amendments.</p>	<p>Mersea Homes (Phase 2 Planning and Development Ltd) (Rep ID: 26306)</p>	<p>Disagree for the following reasons: - The purpose of stating that 35dph will be the average for low-density development is to provide developers and applicants with a starting point for what the Council is seeking in lower density development elsewhere in Ipswich. It is not to be interpreted as a minimum requirement or something that multiple applicants have to calculate based on different densities delivered across different sites historically. It is setting out what the Council considers it should be striving for as a broad approach to low density which is reported on in the Council's Authority Monitoring Reports, whilst also giving applicants/ developers a benchmark to masterplan proposed development capacities.</p>	
<p>Policy DM23 – The Density of Residential Development</p>	<p>Main issue 3: A prescriptive approach in the interpretation of the policy would limit opportunities to respond to market forces. Persimmon also endorse the statement made by the HBF.</p>	<p>Persimmon Homes (Rep ID: 26427)</p>	<p>Disagree for the following reason: - The policy as worded included two exception clauses for when alternative densities may be pursued and this offers sufficient flexibility.</p>	

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<p>Policy DM24 – Protection and Provision of Community Facilities</p>	<p>Main issue 1: The aim is for all of the health providers in the area of Ipswich to provide an Infrastructure Delivery Plan (IDP). This document will allow all of the interested parties to work cohesively in identifying land and properties that are surplus to requirements and contrarily, if land acquisition could be required.</p>	<p>Ipswich &amp; East Suffolk Clinical Commissioning Group &amp; West Suffolk CCG (Rep ID: 26221)</p>	<p>Noted - IBC will continue to liaise with the CCG in the preparation of this.</p>	
<p>Policy DM27 – The Central Shopping Area</p>	<p>Main issue 1: Appreciate efforts by Council to move towards greater flexibility within Central Shopping Area, however, recommend change to policy position for Primary Shopping Zones to include D2 and C1. Such uses can provide active frontages and as such should not be excluded.</p>	<p>Threadneedle UK (Rep ID: 26466)</p>	<p>Disagree for the following reason: policy wording allows for a proportion of D2 and C1 uses (other main town centre uses) in the secondary and specialist shopping zones to allow sufficient flexibility within the Central Shopping Area. The Council is of the view that principally retail, complemented by some alternative A-class uses (e.g. restaurants and coffee shops, is a more appropriate blend for the primary shopping zone and that allowing other main town centre uses here would potentially dilute this concentration to the detriment of the vitality and viability of the</p>	

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			wider Central Shopping Area. Council will review the GPDO implications before they become fully operational in September.	
Policy DM28 – Arts, Culture and Tourism	Main issue 1: Suggest minor amendment to Appendix 6 (paragraph 2.2) to require applicants to market the property through recognised national, regional and local agents, websites and publications appropriate to the type of facility. Subject to this amendment, the policy meets the tests of soundness.	Theatres Trust (26236)	Agree for the following reason: - It is acknowledged that further information could be provided to clarify the marketing strategy that the policy seeks to address. It is therefore recommended that the following wording is inserted immediately onto the end of paragraph 2.2 of the marketing strategy (appendix 6). "The level of marketing of the site must be proportionate to the type and availability of the facility/ use that is being marketed. For example a commercial property should be published by an agent with expertise in marketing commercial uses and marketed at a geographical area (local, regional and/or national) based on the prevalence of this type of use/ facility (e.g. the more unique the existing use/ facility, the wider it should be marketed)."	<a href="#">See Appendix 6 Marketing Requirements</a>

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<p>Policy DM32 – Retail Proposals Outside Defined Centres</p>	<p>Main issue 1: Object to criterion (a) requiring consideration of the appropriateness of scale when assessing out-of-centre retail proposals. Use of 'scale' is no longer recommended by NPPF which only requires an applicant to demonstrate compliance with the Sequential Approach and Impact. In addition, requirement to demonstrate scale not identified by the Evidence Base. Therefore, recommend removal of criterion (a).</p>	<p>AquiGen (Rep ID: 26435)</p>	<p>Disagree for the following reasons:          - The originally drafted NPPF (2012) stated in paragraph 24 in relation to the sequential test that; "Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale." The revised NPPF (2019) continues with this wording in relation to the sequential test at paragraph 87 stating; "Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored." In addition, the revised NPPF also states in relation to the impact assessment at paragraph 89(b) that this should include assessment of; "the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme). The latest Planning Practice Guidance on town centres and retail also references the need to consider scale (paragraph 011). Therefore, it is considered that requiring consideration of scale is consistent with national policy and sound.</p>	
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<p>Policy DM33 – Protection of Employment Land</p>	<p>Main issue 1: Concern that policy only allows for consideration of no reasonable prospect of re-use for employment purposes for sites outside the Employment Areas. Ambiguity in the supporting paragraphs as 9.32.2 and 9.32.4 suggest that the no reasonable prospect test could be applied to Employment Area land. Recommend DM33 is amended to allow test to be applied to all defined Employment Area land to ensure plan is consistent with national guidance and flexible to deal with changing market needs. Important given surplus allocation.</p>	<p>AquiGen (Rep ID: 26431)</p>	<p>Disagree for the following reasons: The Regulation 18 (Preferred Options) did include "outside defined employment areas" before explaining the 'no reasonable prospect test' in paragraph 9.32.4. However, this was deleted because the 'no reasonable prospect test' also applies to small scale services specifically provided for the benefit of businesses based within Employment Areas. It was therefore deleted and replaced with "in accordance with the policy" to correct this. As the text states this it is not deemed to be ambiguous as it correlates to the policy wording. It is considered that there is still a need to protect the employment area land and that applying the no reasonable prospect test would pose a risk to the delivery of the economic strategy for the Borough. The circa 28ha of employment land, above the minimum circa 23ha required, provides flexibility for different users and changing market demands. However, this does not take account of land that would be lost through the application of the no reasonable prospect test if applied to the defined employment areas.</p>	
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<p>Policy DM33 – Protection of Employment Land</p>	<p>Main issue 2: Support safeguarding of the operational areas of the Port through their definition as Employment Areas and welcome recognition of the need for ABP's specific operational requirements and consents and licences for the handling and storage of hazardous substances to be taken into account in any development planned in the vicinity of these areas.</p>	<p>Associated British Ports (Rep ID: 26477)</p>	<p>Noted - no modification required.</p>	
<p>Policy DM33 – Protection of Employment Land</p>	<p>Main issue 3: Support the wording of the policy but the land North of Burrell Road needs to be allocated for residential development.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26650)</p>	<p>Disagree for the following reasons: The principle of a residential development at the proposed site is acceptable, however, it has not been the subject to the same assessments as other site allocations e.g. SFRA and SA, or public consultation as a standard part of plan making and so it would be inappropriate to include it at this time. This site only came forward at Regulation 19 stage. The Council has identified a deliverable supply of residential sites and demonstrated that it can meet its housing need over the Local Plan period. The site would instead likely form part of the Council's windfall which is accounted for in the housing supply.</p>	

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<p>Policy DM34 – Delivery and expansion of Digital Communications Network</p>	<p>Concerned about potential impacts of new 5G technology and other telecoms equipment on the AONB. Amendment to criterion b sought.</p>	<p>AONB Unit (Rep ID: 26257)</p>	<p>Disagree for the following reasons: This is covered through the prior notification procedures.</p>	
<p>Chapter 10 – Implementation</p>	<p>Main issue 1: The 'improvements to Fonnereau Way' listed in Table 8B need to ensure the route is safe for pedestrians as it is currently not safe.</p>	<p>Mr &amp; Mrs Fred Lewis (Rep ID: 26189)</p>	<p>Disagree for the following reasons: Matters such as highway safety and enhancing public rights of way in all development applications are addressed through policy DM21. The Ipswich Garden Suburb Supplementary Planning Document (SPD) (Core Document reference G18) and the first two planning consents and planning agreements relating to the delivery of Ipswich Garden Suburb (IGS) (IP/14/00638/OUTFL and IP/16/00608/OUT) provide more detail about the IGS development and secure financial contributions towards Public Footpath 18, Ipswich Bridleway 21 and Westerfield Bridleway 1. The IGS SPD refers to the provision of new pedestrian / cycle bridge to replace the existing sub-standard at grade crossing where the Fonnereau Way currently crosses the railway line.</p>	

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Chapter 10 – Implementation	Main issue 2: Table 8B refers to a “new health centre.” NHS England are not dispensing new primary care contracts currently so the opportunities of establishing a new health centre in the Ipswich Garden Suburb are severely reduced. Mitigation for the increase in patients from the proposed Ipswich Garden Suburb will be spread between Two Rivers Medical Practice and the new healthcare facility at Tooks.	Ipswich & East Suffolk Clinical Commissioning Group & West Suffolk CCG (Rep ID: 26223)	Noted - This has been set out and a position agreed through the IBC, CCG and ESNEFT draft Statement of Common Ground. It was agreed that this uncertainty was reflected in the change from the Preferred Options Local Plan to the Final Draft Local Plan where “health centre” was replaced with “healthcare provision”. Parties agree that it is still appropriate to include a requirement for healthcare provision at the Ipswich Garden Suburb which will be the subject of S106 negotiations as part of the future IGS applications. No modification required.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf</a>
Chapter 10 – Implementation	Main issue 3: Table 8B: Unclear whether infrastructure improvements to Fonnereau Way relate to exiting route currently defined or amended route within country park.	D Wiseman (Rep ID: 26249)	Disagree for the following reason: The Fonnereau Way is an existing right of way and there is a separate legal process for re-routing such paths out with the Local Plan process. Planning Permissions IP/14/00638/OUTFL and IP/16/00608/OUT) have secured financial contributions towards Public Footpath 18, Ipswich Bridleway 21 and Westerfield Bridleway 1 .	

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Chapter 10 – Implementation	Main issue 4: Table 8B: The existing route through Broadacres at the northern end of Fonnereau Way does not meet the provisions of the NPPF or Section 18 of the Crime and Disorder Act 1998. The SPD represents an opportunity to phase out this unsafe route and eradicate the threat of crime, vandalism and anti-social behaviour by keeping the route within the Country Park.	D Wiseman (Rep ID: 26250)	Disagree for the following reason: The Fonnereau Way is an existing right of way and there is a separate legal process for re-routing such paths out with the Local Plan process. Planning Permissions IP/14/00638/OUTFL and IP/16/00608/OUT) have secured financial contributions towards Public Footpath 18, Ipswich Bridleway 21 and Westerfield Bridleway 1 .	
Chapter 10 – Implementation	Main issue 5: Acute hospital facilities require referencing in table 8B.	East Suffolk & North Essex NHS Foundation Trust (Rep ID: 26266)	Agree - This has been addressed through the draft Statement of Common Ground between IBC, CCG and ESNEFT.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23_-_draft_statement_of_common_ground_with_ccg_esneft.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a23 - _draft_statement_of_common_ground_with_ccg_esneft.pdf</a>

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<p>Chapter 10 – Implementation</p>	<p>Main issue 6: No firm proposals for new sewage infrastructure required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables.</p>	<p>Save Our Country Spaces (Rep ID: 26379) Northern Fringe Protection Group (Rep ID: 26517)</p>	<p>Disagree for the following reasons:</p> <ul style="list-style-type: none"> <li>- IBC commissioned a Cross Boundary Water Cycle Study jointly with East Suffolk Council to understand the impact of likely development on the water environment which includes wastewater infrastructure. This included a level of growth that was in fact higher than that proposed in the submission version of the Local Plan Review due to it being drafted at an earlier stage of plan preparation. The outcome of this Study was that the Water Recycling Centres affected by growth in Ipswich Borough over the Local Plan period can accommodate the level of growth proposed with no additional sewage infrastructure that needs including at this point of the Local Plan Review.</li> <li>- Anglian Water have been involved in the preparation of the Cross Boundary Water Cycle Study, as well as throughout each stage of the Local Plan Review consultation. The result of this has been the agreement of a Statement of Common Ground.</li> <li>- Anglian Water were consulted on both determined planning applications on the IGS and raised no objection to these applications being determined. Both outline planning permissions secure details of the site wide foul and surface water drainage system for the development, including what is required for each development phase.</li> </ul>	
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<p>Chapter 10 – Implementation</p>	<p>Main issue 7: The 13 transport projects need to be included in the Infrastructure Tables. If any of projects aren't delivered by the required dates (which need to be identified) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needed showing funding is in place for these schemes compatible with required delivery dates.</p>	<p>Save Our Country Spaces (Rep ID: 26379) Northern Fringe Protection Group (Rep ID: 26517)</p>	<p>Disagree for the following reason: The points raised in the representation are detailed questions about the assumptions underlying the traffic modelling for the ISPA Local Plans. The Highway Authority agreed the technical assumptions with WSP who provided the modelling and these are considered robust. The model is a tool to indicate where issues are likely to arise in the network and has informed the ISPA Transport Mitigation Strategy. The ISPA Transport Mitigation Funding is being taken forward by an action group of officers. In addition, Table 8A is being reviewed through in part the Statement of Common Ground with the county council. The traffic modelling work undertaken (the most up to date being Run 7) identifies capacity issues in the network arising from growth. The Highway Authority is addressing the issues through the ISPA Transport Mitigation Strategy and Action Plan, and associated work such as the Local Cycling and Walking Infrastructure Strategy (which is supported by Government funding). In relation to the A1214, improvements are planned by Highways England through funding bids to the DfT. These are listed in infrastructure Table 8A.</p>	
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Chapter 10 – Implementation	Main issue 8: Bramford Road/ Sproughton Road (IP029) link road must be included.	Save Our Country Spaces (Rep ID: 26379) Northern Fringe Protection Group (Rep ID: 26517)	Disagree for the following reasons: - Table 8A references the link road in question and the draft Statement of Common Ground between Suffolk County Council and Ipswich Borough Council expands on this further with some modifications proposed.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf</a>
Chapter 10 – Implementation	Main issue 9: Table 8a needs updating to clarify the contributions expected from development and specific early years and education requirements.	Suffolk County Council (Rep ID: 26573)	Agree for the following reason: Suffolk County Council and Ipswich Borough Council have prepared a draft Statement of Common Ground outlining certain changes to table 8A. In addition, both parties have continued to liaise on this since submission and this will be reflected in an updated Statement of Common Ground in due course.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf</a>

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<p>Appendix 6 – Marketing Requirements</p>	<p>Main issue 1: Suggest paragraph 2.2 requires applicants to market the property through recognised national, regional and local agents, websites and publications appropriate to the type of facility. This would prevent applicants undermining the policy objective by superficially addressing policy, for example listing with small agents in other parts of the country or listing commercial property with residential agents.</p>	<p>Theatres Trust (Rep ID: 26240)</p>	<p>Agree for the following reason:          - It is acknowledged that further information could be provided to clarify the marketing strategy that the policy seeks to address. It is therefore recommended that the following wording is inserted immediately onto the end of paragraph 2.2 of the marketing strategy (appendix 6). "The level of marketing of the site must be proportionate to the type and availability of the facility/ use that is being marketed. For example a commercial property should be published by an agent with expertise in marketing commercial uses and marketed at a geographical area (local, regional and/or national) based on the prevalence of this type of use/ facility (e.g. the more unique the existing use/ facility, the wider it should be marketed)."</p>	<p><a href="#">See Appendix 6 Marketing Requirements</a></p>
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Appendix 6 – Marketing Requirements	Main issue 2: Aspects of marketing requirements are onerous and should be removed. Discussions with Council before marketing unnecessary if marketing requirements in Appendix 6 are followed. Welcome amendment to require simple schedule noting origin of enquiry and reason for interest is sufficient. Commercial site not generally marketed at set market value - "All Enquiries" exercise appropriate as it generates enquiries on all potential purchase options.	AquiGen (Rep ID: 26434)	Disagree for the following reasons: that; "Developers are advised to discuss marketing arrangements prior to advertising". As stated above, this is an advisory and not a requirement of the marketing strategy. It is pointing out the benefits of engaging with the Council at an early stage to avoid wasted time in marketing a site incorrectly and then having to restart the process at a later date. - An "all enquiries" exercise would not accord with the purpose of the marketing strategy which is to ascertain whether there is a market demand for the site in question. Opening it up to all potential uses would not demonstrate the level of interest in the existing use of the site.	
Plan 2 – Flood Risk	Main issue 1: The statement regarding fluvial flooding is incorrect as the plan shows both fluvial and tidal flooding.	Environment Agency (Rep ID: 26278)	Agree for the following reason - this is a factual inaccuracy and should be corrected as a minor amendment for clarity to read: This plan of nationally designated flood zones relates to fluvial <u>and tidal</u> flooding.	<a href="#">See Minor changes Reg 19 to Reg 22</a>

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<p>Plan 2 – Flood Risk</p>	<p>Main issue 2: Request that Plan 2 and/or the Core Strategy and Policies Development Plan Document should include a note making clear that the flood zones shown on Plan 2 are indicative and that IBC will rely on the current Environment Agency Flood Maps to determine what flood risk zone any site may fall within for decision making purposes.</p>	<p>Associated British Ports (Rep ID: 26478)</p>	<p>Agree for the following reasons: Plan 2 is included for information but the data originates from the Environment Agency and the Government who review the Flood Risk maps periodically. A brief explanatory note is proposed to Plan 2 for information as a minor modification.</p>	<p><a href="#">See Minor changes Reg 19 to Reg 22</a></p>
<p>Plan 5 – Ipswich Ecological Network</p>	<p>Main issue 1: Green Corridor F could be extended beyond what is shown. See suggested route. Two of the sites (IP143 and IPO67b) make up a substantial part of Green Corridor F. If these sites are fully developed, this ecological network would be interrupted.</p>	<p>Suffolk Wildlife Trust (Rep ID: 26327)</p>	<p>Disagree for the following reason: planning permission (17/00769/OUT) and this includes an ecological assessment and appropriate surveys. Sites IPO67b, IP150b - e and IP152 (the suggested amended route) are identified on Plan 5 (Ipswich Ecological Network) as potential development sites with wildlife interest and/or within the identified buffer zone of the green corridor. The site sheets for these sites also highlight the need for biodiversity enhancement, mitigation and appropriate surveys which by virtue will require consideration of links to adjoining wildlife sites and sites of interest.</p>	

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Plan 5 – Ipswich Ecological Network	Main issue 2: The map refers to Wildlife Audit 2012/2013, which is out-of-date (see 2019 update).	Suffolk Wildlife Trust (Rep ID: 26327)	Agree for the following reason: The map should be updated to reflect the most up to date Wildlife Audit.	<a href="#">See Plan 5 Ipswich Ecological Network</a>
Plan 6 – Green Corridors	Main issue 1: Arrows point towards parks/green areas, however not interconnected and there is no coherent walking or cycling route.	Andrea McDonald (Rep ID: 26204)	Disagree for the following reasons: - The green corridors are indicative routes showing how green arterial routes into and out of the town may be achieved. The linking of these routes will come down to detailed cycle/ walking improvements that Suffolk County Council as the Highway Authority will need to consider in any future highway improvement plans. The purpose of this policy is to ensure that individual developments on or immediately adjacent to these green corridors take account of the goal of creating these green routes and do not compromise the ability to deliver these in the future.	
Plan 6 – Green Corridors	Main issue 2: Green Corridor F could be extended beyond what is shown. See suggested route. Two of the sites (IP143 and IP067b) make up a substantial part of Green Corridor F. If these sites are fully developed, this ecological network would be interrupted.	Suffolk Wildlife Trust (Rep ID: 26327)	Disagree for the following reason: Site IP143 has outline planning permission (17/00769/OUT) and this includes an ecological assessment and appropriate surveys. Sites IP067b, IP150b - e and IP152 (the suggested amended route) are identified on Plan 5 (Ipswich Ecological Network) as potential development sites with wildlife interest and/or within the identified buffer zone of the green corridor. The site sheets for these sites also highlight the need for biodiversity enhancement, mitigation and appropriate surveys which by virtue will	

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<b>5.2 Site Allocations and Policies (incorporating IP-One Area Action Plan (DPD) Review</b>				
<b>Chapter/ Section</b>	<b>Main Issue</b>	<b>Representation(s)</b>	<b>IBC Agree/ Disagree/ Resolvable by Main Mod(s)</b>	<b>Proposed Main Mod(s) (if applicable)</b>
Legal Compliance, Introduction and General Comments	Main issue 1: Noted that a number of policies in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft would support the delivery of transport mitigation in the ISPA. Particularly, the potential provision for park and ride facilities under IP152, improvement to cycling and walking provision under SP15 and limiting congestion under SP17.	East Suffolk Council (Rep ID: 26420)	Noted - no modification required.	

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<p>Legal Compliance, Introduction and General Comments</p>	<p>Main issue 2: The plan is poorly prepared and presented and is very difficult to read. It lacks justification and its policies are neither useful to developers or decisionmakers. It is the most poorly presented plan in the region.</p>	<p>Ravenswood Environmental Group (Rep ID: 26331)</p>	<p>Disagree, for the following reasons: The final draft local plan is written in two main parts. The first part ‘Core Strategy and Policies Development Plan Document’ sets out the strategic vision and objectives for Ipswich to 2036. Secondly it promotes the spatial strategy for the development of the town to 2036 through strategic policies within the context of the Ipswich Strategic Planning Area (Chapter 8); and thirdly, it provides a suite of policies to control, manage and guide development across the Borough (Chapter 9). Each of the two main policy chapters (8 and 9) follows the same broad structure. In each case a policy is identified and then structured into the following sections: • A short introduction to the issue, where needed; • The policy; and • The justification for the policy, how it supports plan objectives and guidance on its implementation. The second document the ‘Site Allocations and Policies (incorporating IP One Action Plan) Development Plan Document’ identifies a range of sites for different uses across the whole Borough that are allocated for development. It sets out policies for town centre leisure and retail uses and policies for the Ipswich IP-One Area. The purpose of this plan review was determined by the previous Inspector into the now adopted 2017 Ipswich Local Plan which was primarily focussed on housing. The general format of this Final Draft</p>	
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			Local Plan Review documents follow the format of the 2017 adopted Local Plan therefore.	
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<p>Legal Compliance, Introduction and General Comments</p>	<p>Main issue 3: It needs to demonstrate cross boundary working as happens in Greater Norwich and Greater Cambridge and it needs criteria based policies so that it can be held to account by the public and used successfully by developers. It is vague and the environmental impacts are not justified. Needs to be re-written.</p>	<p>Ravenswood Environmental Group (Rep ID: 26331)</p>	<p>Disagree for the following reasons: The Council works very closely with the ISPA authorities. It wrote the Sustainability Appraisal Scoping Paper jointly with East Suffolk which is a cornerstone of plan-making identifying criteria and issues which the local plan seeks to address. In addition, it jointly prepared the Water Cycle Study. All the districts worked together on the procurement of the Landscape Impact Assessment which lay on top of the landscape character assessment work which had already been prepared. The ISPA authorities jointly commissioned the traffic modelling and on finding that only 45% of trips were generated from and to parts of Ipswich, Ipswich authorities are working together through the Transport Mitigation Strategy to mitigate the impact of traffic arising from their districts on Ipswich. This is very important as traffic is the major source of Ipswich Town Centre poor air quality.</p>	
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<p>Legal Compliance, Introduction and General Comments</p>	<p>Main issue 4: The plan contains disjointed lists of sites and does nothing to assist decision makers to establish what is or is not acceptable or how various constraints would be overcome.</p>	<p>Ravenswood Environmental Group (Rep ID: 26331)</p>	<p>Disagree for the following reasons: - The Local Plan Review identifies existing constraints in the Borough. These are highlighted where applicable to each of the site sheets for the proposed allocations of sites. This is to ensure that all parties are aware of these constraints and the need to ensure that these are overcome and mitigated. It would not be reasonable to define exactly how each development should be designed to respond to these constraints at the plan-making stage. Instead, it will be at the pre-application and application stages where details are presented and at this point the Council, in consultation with consultees and other stakeholders, will provide detailed advice, if necessary, as to how to address these constraints. There may also be cases where design briefs and/or supplementary planning documents are prepared for large-scale sites or sites within close proximity if deemed necessary but these will be independent of this Local Plan Review.</p>	
<p>Chapter 2 – The Ipswich Local Plan</p>	<p>Main issue 1: Support this section of the Plan.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26651)</p>	<p>Noted - no modification required.</p>	

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<p>Policy SP1 – The Protection of Allocated Sites</p>	<p>Main issue 1: Support safeguarding of sites for the uses for which they have been allocated, subject to the recognition that where sites (such as the Island Site) are in existing use and are allocated for alternative use(s), redevelopment will be dependent on commercial viability.</p>	<p>Associated British Ports (Rep ID: 26479)</p>	<p>Noted - no modification required.</p>	
<p>Policy SP2 – Land Allocated for Housing</p>	<p>Main issue 1: Site IP034 (Wherstead Road) should be included as a residential allocation. Flooding assessments and consultation with the appropriate bodies has been carried out with no fundamental objections.</p>	<p>Salter and Skinner Partnership (Planning Direct) (Rep ID: 26181)</p>	<p>Disagree for the following reasons: The Strategic Housing and Economic Land Availability Assessment (2020) found that this site was not suitable for residential development, concluding that; <i>"The site is not suitable for residential development. It is located within Flood Zones 2 and 3 and would be in conflict with the Council's Development and Flood Risk Supplementary Planning Document as it would not meet the definition of safe."</i> Whilst safe refuge and appropriate floor levels could be achieved on the site, safe access/egress in the event of a flood could not, with access routes blocked by deep and, in places, fast flowing water. The land owner's site specific Flood Risk Assessment indicates that escape routes off site have been investigated but water would reach a depth greater than 20cm (and up to 2m in places). The Suffolk Fire and Rescue Service has confirmed that 20cm is the maximum depth that could be considered suitable for emergency vehicles. Furthermore, flooding of</p>	

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			<p>any depth may require dynamic risk assessments and may render fire hydrants inactive which would delay and/or put at risk future site occupants. The National Planning Policy Framework requires that development should be made safe for its lifetime without increasing flood risk elsewhere. Adopted and emerging Ipswich Borough Council Local Plan policy reflects this requirement through policy DM4. Safety is defined through the Development and Flood Risk SPD 2016.</p>	
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<p>Policy SP2 – Land Allocated for Housing</p>	<p>Main issue 2: Although support the inclusion of the allocation at Humber Doucy Lane within the Core Strategy document, it should also be included within the Site Allocations and Policies DPD. Omission is neither justified nor effective. Recommend additional line within Table 1 in relation to Humber Doucy Lane, and for the sake of completeness, Ipswich Garden Suburb should also be included. Recommend amendment to paragraph 4.7 wording.</p>	<p>Kesgrave Covenant (Rep ID: 26458)</p>	<p>Disagree for the following reasons: The land north of Humber Doucy Lane allocated under SP2 and also as Site ISPA4.1 is a strategic cross-boundary allocation between Ipswich and East Suffolk. The two sites are planned to be the subject of joint master planning to bring them forward concurrently and the two authorities have mirrored the policy concerning the sites in their respective plans. The site is subject to a site sheet in the normal way as other sites under ISPA4.1. Because the site came out of joint working, it is more appropriate as being considered as a strategic policy, although the land allocation element is also reflected in the plan. It is a key strategic site for the Borough.</p>	
<p>Policy SP2 – Land Allocated for Housing</p>	<p>Main issue 3: Support allocation for the Island Site and references that figures are indicative, however, believe that current indicative capacity of 421 homes is high. Consider that the Island Site will deliver a reduced density of approximately 150 units. Request removal of reference to need for “additional vehicular ... access (including emergency access)...to be provided to enable the site’s development”.</p>	<p>Associated British Ports (Rep ID: 26482)</p>	<p>Disagree for the following reasons: The adopted Local Plan shows a lower capacity for the site than the current emerging Local Plan. It is necessary to have vehicular access to the Island as without this emergency vehicles would have difficulty ingressing and egressing the site.</p>	

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<p>Policy SP2 – Land Allocated for Housing</p>	<p>Main issue 4: Bloor Homes are promoting land at Humber Doucy Lane, Rushmere St Andrew, (see Site Location Plan Appendix A). Land is situated within both the Ipswich Borough and East Suffolk District. Approximately 115 hectares in size. It presents both a shorter-term opportunity for a smaller scheme and a medium-long term opportunity for a larger scale Garden Village development. Development Framework Plans are included (Appendix B).</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26577)</p>	<p>Disagree for the following reasons: Ipswich Borough Council has demonstrated that it has a sufficient supply of sustainable housing sites over the Local Plan period to meet the objectively assessed housing need. There is no necessity for the proposed site to meet this need. The Suffolk Coastal Local Plan Main Modifications consultation does not include the proposed site. As the final Inspectors Report has not been published, it cannot be confirmed that it has been found to be a sustainable location for growth. The spatial option of delivering housing outside the Borough boundary in locations such as this has been broadly assessed as an option but did not score as highly in the Sustainability Appraisal compared to the preferred spatial option of high-density urban regeneration. This assessment is considered to be robust.</p>	
<p>Policy SP2 – Land Allocated for Housing</p>	<p>Main issue 5: Not justified. Plan needs to be rewritten to justify sites with criteria-based policies which deal with the mitigation of development impacts.</p>	<p>Ravenswood Environmental Group (Rep ID: 26332)</p>	<p>Disagree for the following reason:          - The format and application of this policy approach was established by way of the adoption of the 2017 Local Plan. The emerging Local Plan Review is a review of the adopted Local Plan and therefore it would be inappropriate to change the nature of the policy. The allocation of land through this policy and then provision of further details through the site sheets is considered to be an effective way of allocating land for housing.</p>	

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<p>Policy SP2 – Land Allocated for Housing</p>	<p>Main issue 6: It is not clear whether the site sheets are or are not part of the plan.</p>	<p>Ravenswood Environmental Group (Rep ID: 26336)</p>	<p>Disagree for the following reason:          - Appendix 3A clearly states, "Please note that the site sheets provided in Appendix 3A are for information only; land allocations are made through the policies of the plan." The purpose of the site sheets is to provide additional information/ constraints and guidance for these sites in the event that development comes forward. The site sheets correlate with the land allocations set out in the respective policies of the Site Allocations DPD (e.g. SP2, SP5 etc).</p>	
<p>Policy SP2 – Land Allocated for Housing</p>	<p>Main issue 7: Site IP150 e is adjacent to other sites such as IP150c and IP150e and IP150d. These are geographically related, but they are separate in the plan. There is no justification for this piecemeal approach.</p>	<p>Ravenswood Environmental Group (Rep ID: 26336)</p>	<p>Disagree for the following reason:          - The Site Allocations DPD sets out land allocations based on sub-chapters of different types of allocations (e.g. residential allocations, sites with planning permission/ S106, employment allocations etc). This thematic approach to the layout of the document is considered to be the most effective way of presenting the document. The fact that the site allocations share the same starting number (IP150), as well as sharing similar addresses/ locations (Ravenswood), provides sufficient clarity as to the close geographical proximity of the sites to one another.</p>	

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<p>Policy SP2 – Land Allocated for Housing</p>	<p>Main issue 8: The plan highlights serious traffic, air-quality, ecology, amenity and heritage constraints but does nothing to resolve these and does not insist upon master planning and effective mitigation. It is unacceptable to propose development only with a list of issues whilst not inviting or suggesting how these would be resolved.</p>	<p>Ravenswood Environmental Group (Rep ID: 26336)</p>	<p>Disagree for the following reasons:          - The Local Plan Review identifies existing constraints in the Borough. These are highlighted where applicable to each of the site sheets for the proposed allocations of sites. This is to ensure that all parties are aware of these constraints and the need to ensure that these are overcome and mitigated. It would not be reasonable to define exactly how each development should be designed to respond to these constraints at the plan-making stage. Instead, it will be at the pre-application and application stages where details are presented and at this point the Council, in consultation with consultees and other stakeholders, will provide detailed advice, if necessary, as to how to address these constraints. There may also be cases where design briefs and/or supplementary planning documents are prepared for large-scale sites or sites within close proximity if deemed necessary but these will be independent of this Local Plan Review.</p>	
<p>Policy SP2 – Land Allocated for Housing</p>	<p>Main issue 9: Support principle of allocating sites but need to allocate land to the North of Burrell Road as a residential allocation.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26652)</p>	<p>Disagree for the following reasons: The principle of a residential development at the proposed site is acceptable, however, it has not been the subject to the same assessments as other site allocations e.g. SFRA and SA, and so it would be inappropriate to include it at this time. The Council has identified a deliverable supply of residential sites and demonstrated that it can meet its housing</p>	

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			need over the Local Plan period. The site would instead likely form part of the Council's windfall which is accounted for in the housing supply.	
Policy SP2 – Land Allocated for Housing	Main issue 10: Table 1 should refer to early years provision at sites IP048a Mint Quarter and IP037 Island Site.	Suffolk County Council (Rep ID: 26600)	Agree - This modification has been agreed through the draft Statement of Common Ground between SCC and IBC.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf</a>
Policy SP2 – Land Allocated for Housing	Main issue 11: Site IP048a (Mint Quarter) The specification of the retention of the locally listed façade is too specific for a site allocation policy and the requirement for a development brief is unnecessary. The school component of allocation IP048a should be a separate allocation for a Primary School only.	Department for Education (Rep ID: 26550)	Disagree for the following reasons: - The site sheet for IP048a is guidance and does not necessitate that the locally listed façade must be retained for development to take place. Instead it sets out that it would be desirable to be retained "if feasible". There is not a requirement for a development brief as the site sheet states; "A development brief for the whole site (east and west of Cox Lane) will be prepared but development may come forward incrementally." Again, it would be preferable if a development brief could be prepared given the mix of proposed land uses and owners but it is not a requirement. Due to the variety of access points/ rights of way running through the site and mix of uses it is considered that a larger allocation as proposed is more effective to ensuring that	

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			development can come forward without compromising other parts of the site from being accessed/ brought forward.	
Policy SP3 – Land with Planning Permission or Awaiting a Section 106	Main issue 1: Support identification of IP206 and IP211 within Policy SP3, however, believe that the capacity figures are conservative and should be increased by up to 50%, with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035).	Cardinal Lofts (Mill) Ltd) (Rep ID: 26568)	Disagree for the following reasons: - The capacities for IP206 and IP211 are based on the latest available planning permissions for each of the respective sites. This is considered to be evidence of the anticipated capacities of each of the sites. - The capacity for IP035 is set at a high density of 200 dwellings per hectare (on 80% of the site). Due to the varying types and levels of constraints present on this site (adjoining listed buildings, contamination, archaeology, air quality area etc), it is not considered realistic to increase the capacity on this site.	

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<p>Policy SP3 – Land with Planning Permission or Awaiting a Section 106</p>	<p>Main issue 2: SP2 sites are undeliverable and therefore land should be identified in neighbouring areas.</p>	<p>Gladman Homes (Rep ID: 26419)</p>	<p>Disagree for the following reasons: The Council considers that the housing sites included in the Local Plan Review are deliverable. The Council has followed the sequential approach to site selection. The two sites presented by the objector would not align with the Council's preferred approach to spatial development set out in the Sustainability Appraisal which is one of high-density urban regeneration. The sites presented are more akin to spatial option 2 assessed in the Sustainability Appraisal which was rejected on the grounds that it performed poorer than the preferred spatial option and would not constitute sustainable development.</p>	
<p>Policy SP4 – Opportunity Sites</p>	<p>Main issue 1: SP4 Opportunity Sites are not deliverable or viable and therefore land should be identified in neighbouring districts.</p>	<p>Gladman Homes (Rep ID: 26423)</p>	<p>Disagree for the following reasons: - It is fully acknowledged that at the time of preparing this Local Plan Review, there is some uncertainty regarding the deliverability of the SP4 Opportunity Sites. However, it is important to note that these sites do not form part of the identified housing supply of the Local Plan Review. The purpose of the Opportunity Sites is to express the Council's support for a residential-led redevelopment of some key sites in the Borough. This then offers confidence and support to potential developers of the sites if market conditions happen to change over the Local Plan Period or if changes in ownership were to improve deliverability. Therefore, as the Local Plan</p>	

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			Review is not dependent on the delivery of these sites, it is not necessary to identify land for housing in the neighbouring districts.	
Policy SP5 – Land Allocated for Employment Use	Main issue 1: Recommend reducing land allocation to reflect actual need. Land allocated in Table 3 (28.34ha) is significantly in excess of calculated requirement from Evidence Base (23.2ha). Such over provision can only be justified where there are clear reasons for a land supply buffer. No such evidence has been presented in the Plan or Evidence Base. Of the land allocated in Table 3, circa 24ha has been identified as being suitable for industrial uses -significant excess of the 9ha need calculated by the Employment Land Needs Assessment.	AquiGen (Rep ID: 26437)	Disagree for the following reason: - The excess allocation of 5.14ha of employment land is only representative of 22% above the minimum identified need. This additional land is necessary to ensure that the Council has a range of land types (greenfield/ brownfield), sizes (small, medium and large) and locations (business parks, industrial estates, town centre) to serve future economic needs.	

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<p>Policy SP5 – Land Allocated for Employment Use</p>	<p>Main issue 2: The Ravenswood employment sites should be planned so as to mitigate traffic impacts and be master planned with residential development. The whole area should be master planned so that environmental impacts are considered.</p>	<p>Ravenswood Environmental Group (Rep ID: 26336)</p>	<p>Disagree for the following reason:          - The need to masterplan the sites is referenced in the site sheets for example; "Access constraints – The site will need to be master planned comprehensively with the Ravenswood allocations IP150b through to IP150e and the Airport Farm Kennels site to the south to satisfactorily address potential significant impact on junctions which are already under strain and identify any junction (capacity) enhancements needed to avoid cumulative residual severe impact."</p>	
<p>Policy SP5 – Land Allocated for Employment Use</p>	<p>Main issue 3: The plan proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Master planning and EIA must be insisted upon.</p>	<p>Ravenswood Environmental Group (Rep ID: 26339)</p>	<p>Disagree for the following reasons: These are existing allocations in the Adopted Local Plan. The indicative capacities for sites IP152 and IP150c have been derived from the calculations from the 2016 Employment Land Needs Assessment in terms of employment density. The indicative floorspace amounts are based on the type of employment uses proposed (e.g. B1, B2, B8) and the site areas. These figures are similar, but updated, from the Homes and Community Agency calculations in 2010. The sites will be subject to master planning and ensuring safe and effective access will be part of this exercise. SCC has been tasked with identifying strategic highways options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood. SCC will address any short term</p>	

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			<p>highway issues too. The need for an Environmental Impact Assessment will be dictated by the detail of any planning application and the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.</p>	
<p>Policy SP6 – Land Allocated and Protected as Open Space</p>	<p>Main issue 1: Object to the requirement that the Island Site provides 15% open space which is more than the minimum amount of on-site public open space provision required through Core Strategy Review Policy DM6. Request removal of reference.</p>	<p>Associated British Ports (Rep ID: 26483)</p>	<p>Disagree for the following reasons: Policy DM6 i developments (defined in Policy DM23), the gre area, to compensate for the more limited ameni attractive setting for the buildings." The Island s therefore considered a high density developmer as open space.</p>	

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Policy SP7 – Land Allocated for Leisure Uses or Community Facilities	Main issue 1: IP150b - Floodlighting has the potential to harm the AONB. The AONB is not identified as a constraint. The need to assess impact on the AONB needs to be identified.	AONB Unit (Rep ID: 26285)	Agree for the following reasons: The site sheet for IP150b states that further assessments would need to be undertaken to ensure that development proposals would not harm ecology on site and at nearby European protected sites. This should also include reference to the AONB which is similarly close by and main modifications are proposed.	<a href="#">See IP150b Land South of Ravenswood</a>
Policy SP7 – Land Allocated for Leisure Uses or Community Facilities	Main issue 2: Support Council's position that the amount of land for leisure or community uses on the Island Site should be determined through master planning.	Associated British Ports (Rep ID: 26484)	Noted - no modification required.	
Policy SP7 – Land Allocated for Leisure Uses or Community Facilities	Main issue 3: The Sports Park proposal is vague and unjustified. The plan does not explain what a sports park is or how the ecological impacts of its development would be mitigated. Delete IP150b sports park.	Ravenswood Environmental Group (Rep ID: 26335)	Disagree for the following reasons: This allocation is carried forward from the Adopted Ipswich Local Plan. The Council's Public Open Space SPD 2017 identifies a deficit of outdoor sports provision in the South East area. The site sheet for IP150b suggests that the site has potential wildlife interest and that ecological surveys would be required before any work took place. These would likely outline potential mitigation. Additionally, the site sheet suggests that part of the existing wildlife network and wildlife corridors should be safeguarded within future proposals.	

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Policy SP7 – Land Allocated for Leisure Uses or Community Facilities	Main issue 4: Site IP129 BT Depot – support school allocation.	Department for Education (Rep ID: 26543)	Noted - no modification required.	
Policy SP9 – Safeguarding Land for Transport Infrastructure	Main issue 1: Owner of site IP152 objects to Park and Ride use on this site.	JPL Properties LLP (Mr James Little) (Rep ID: 26191)	Disagree for the following reasons: - The primary allocation of this site is for employment use. The Site Allocations DPD only commits to investigate the feasibility of a Park and Ride at this site, unlike the Anglia Parkway site to the north of the Borough which is safeguarded. The feasibility work will be the subject of more detailed work in consultation with Suffolk County Council and dependent on other streams of work such as the County wide Local Transport Plan. It is considered that, subject to the above feasibility, a park and ride use in this location may help to achieve sustainable transport goals.	

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Policy SP9 – Safeguarding Land for Transport Infrastructure	Main issue 2: Object to inclusion in IP037 allocation of need for “additional vehicular access to the Island Site to enable the site’s development” and request removal. Object to inclusion of wording: “development layout should not prejudice future provision of a Wet Dock Crossing”. Request appropriate amendment to Policy SP9 and/or Policies Map IP – One Area Inset concerning the provision of a wet dock crossing.	Associated British Ports (Rep ID: 26486)	Disagree for the following reasons: The development of the site is designed not to prejudice the wet dock crossing and indeed following the decision not to pursue the three Bridges scheme, SCC has reserved up to £10.8m to help secure it or something similar. It is important to have a vehicular access to the site to accommodate emergency vehicles should they ever be required and to ensure a link between the island site and the west bank.	
Chapter 5 – IP-One Area	Main issue 1: Generally supportive of the vision for the IP-One area.	Cardinal Lofts (Mill) Ltd) (Rep ID: 26569)	Noted - no modification required.	
Policy SP11 – The Waterfront	Main issue 1: Support Policy SP11 and welcome the recognition at para 5.21 of the need for new development to take account of the Port’s operational needs.	Associated British Ports (Rep ID: 26487)	Noted - no modification required.	
Policy SP11 – The Waterfront	Main issue 2: Fully supportive of Policy SP11.	Cardinal Lofts (Mill) Ltd) (Rep ID: 26570)	Noted - no modification required.	

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<p>Policy SP11 – The Waterfront</p>	<p>Main issue 3: The Waterfront area needs to be extended westwards to cover land North of Burrell Road. The allocation of this site for residential development would achieve the aims of this policy.</p>	<p>Silverton Aggregates Ltd (Chloe Parmenter) (Rep ID: 26652)</p>	<p>Disagree for the following reasons: The character and use of the land westwards (predominantly low rise residential) is different from that within the Waterfront boundary (mixed use high rise) and so it would not be appropriate to extend it to include this area. The principle of a residential development at the proposed site is acceptable, however, it has not been the subject to the same assessments as other site allocations e.g. SFRA and SA, or public consultation as a standard part of plan making and so it would be inappropriate to include it at this time. This site only came forward at Regulation 19 stage. The Council has identified a deliverable supply of residential sites and demonstrated that it can meet its housing need over the Local Plan period. The site would instead likely form part of the Council's windfall which is accounted for in the housing supply.</p>	
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<p>Policy SP11 – The Waterfront</p>	<p>Main issue 4: Unclear which boundaries are the Opportunity areas and which areas are covered by Policies SP11, SP12, and SP13. Opportunity areas need to be clearly defined and labelled. Chapter 6 of the Site Allocation document provides further information on the opportunity areas, setting out development principles for each area, which we welcome. However, these principles are not set out in policies SP11, SP12, and SP13, and it would appear that the other opportunity areas in this section of the Plan (see our comments regarding the mismatch of opportunity areas above) don't have policies at all.</p>	<p>Historic England (Rep ID: 26663)</p>	<p>Agreed: Following the meeting with HE on the matter it was apparent that the objection was not to the principle and all the work required was in the plan, however there needed to be more clarity and a 'golden thread' through from strategic policies to allocations and the opportunity areas with a vision for what they were designed to achieve and a summary of the character of each Opportunity Area to explain what made that area unique. In addition an additional plan has been inserted to make the areas covered by the Opportunity Areas clearer. This is being addressed through the draft Statement of Common Ground.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf</a></p>
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<p>Policy SP12 – Education Quarter</p>	<p>Main issue 1: Unclear which boundaries are the Opportunity areas and which areas are covered by Policies SP11, SP12, and SP13. Opportunity areas need to be clearly defined and labelled. Chapter 6 of the Site Allocation document provides further information on the opportunity areas, setting out development principles for each area, which we welcome. However, these principles are not set out in policies SP11, SP12, and SP13, and it would appear that the other opportunity areas in this section of the Plan (see our comments regarding the mismatch of opportunity areas above) don't have policies at all.</p>	<p>Historic England (Rep ID: 26664)</p>	<p>Agreed: Following the meeting with HE on the matter it was apparent that the objection was not to the principle and all the work required was in the plan, however there needed to be more clarity and a 'golden thread' through from strategic policies to allocations and the opportunity areas with a vision for what they were designed to achieve and a summary of the character of each Opportunity Area to explain what made that area unique. In addition an additional plan has been inserted to make the areas covered by the Opportunity Areas clearer. This is being addressed through the draft Statement of Common Ground.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf</a></p>
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<p>Policy SP13 – Portman Quarter (formerly Ipswich Village)</p>	<p>Main issue 1: Unclear which boundaries are the Opportunity areas and which areas are covered by Policies SP11, SP12, and SP13. Opportunity areas need to be clearly defined and labelled. Chapter 6 of the Site Allocation document provides further information on the opportunity areas, setting out development principles for each area, which we welcome. However, these principles are not set out in policies SP11, SP12, and SP13, and it would appear that the other opportunity areas in this section of the Plan (see our comments regarding the mismatch of opportunity areas above) don't have policies at all.</p>	<p>Historic England (Rep ID: 26665)</p>	<p>Agreed: Following the meeting with HE on the matter it was apparent that the objection was not to the principle and all the work required was in the plan, however there needed to be more clarity and a 'golden thread' through from strategic policies to allocations and the opportunity areas with a vision for what they were designed to achieve and a summary of the character of each Opportunity Area to explain what made that area unique. In addition an additional plan has been inserted to make the areas covered by the Opportunity Areas clearer. This is being addressed through the draft Statement of Common Ground.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf</a></p>
<p>Policy SP15 – Improving Pedestrian and Cycle Routes</p>	<p>Main issue 1: No coherent walking or cycling route.</p>	<p>Andrea McDonald (Rep ID: 26203)</p>	<p>Disagree for the following reasons: The linking of these routes will come down to detailed cycle/ walking improvements that Suffolk County Council as the Highway Authority will need to consider in any future highway improvement plans. The purpose of this policy is to ensure that individual developments on or immediately adjacent to the areas identified take account of the goal of creating these routes and do not compromise the ability to deliver these in the future.</p>	

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Policy SP15 – Improving Pedestrian and Cycle Routes	Main issue 2: The area around the roundabout near St Peters Church is especially problematic.	Andrea McDonald (Rep ID: 26203)	Noted - The policy recognises the need to improve the walking and cycling environment in this area. The detailed design and implementation will be the responsibility of the Highway Authority.	
Policy SP15 – Improving Pedestrian and Cycle Routes	Main issue 3: The river towpath is divided from the waterfront by the gyratory and is in need of improvement.	Andrea McDonald (Rep ID: 26203)	Noted - The policy recognises the need to improve the walking and cycling environment in this area. The detailed design and implementation will be the responsibility of the Highway Authority.	
Policy SP15 – Improving Pedestrian and Cycle Routes	Main issue 4: Cars should not be allowed to drive around the waterfront due to highway safety and to improve the river path.	Andrea McDonald (Rep ID: 26203)	Noted - This is a decision for the highway authority. There is limited traffic movements allowed in this area. The policy seeks to ensure that the walking and cycling environment of the waterfront is considered.	
Policy SP15 – Improving Pedestrian and Cycle Routes	Main issue 5: Supportive of this policy.	Theatres Trust (Rep ID: 26239)	Noted - no modification required.	
Policy SP15 – Improving Pedestrian and Cycle Routes	Main issue 6: Support aspiration for a safe cycle/pedestrian access across the lock gates at the entrance to the Wet Dock subject to viability and ensuring Port operations are not compromised. Support provision of new foot/cycle bridges across the New Cut subject to the provision of such bridges being supported by public funding.	Associated British Ports (Rep ID: 26488)	Noted - no modification required.	

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<p>Policy SP15 – Improving Pedestrian and Cycle Routes</p>	<p>Main issue 7: Generally supportive of Policy SP15, however, still have serious concerns about the impact of the proposals set out in the policy upon the development of Site IP035.</p>	<p>Cardinal Lofts (Mill Ltd) (Rep ID: 26571)</p>	<p>Disagree for the following reason: - Whilst the general support is noted, it is considered that the ambition to help improve the pedestrian environment between the Waterfront and the Central Shopping Area through Policy SP15 is pivotal to help improve the vitality and viability of these areas. This improved pedestrian environment would encourage more pedestrian trips to both areas whilst also improving highway safety. This may involve the inclusion of some supporting infrastructure as part of the development of IP035 to achieve this due to its position strategically between the Waterfront and the Central Shopping Area. However, this would be the subject of detailed discussions at the design stage of any pre-application or application.</p>	
<p>Policy SP16 – Transport Proposals in IP-One</p>	<p>Main issue 1: Object to inclusion of statement (para 5.42), “which as a minimum will require a road bridge from the west bank to the Island Site... to enable any significant development”, and request removal. Need for access will depend on development established through master planning.</p>	<p>Associated British Ports (Rep ID: 26489)</p>	<p>Disagree for the following reason: It is an objective of the development of the Island Site, which is also an allocation in the adopted 2017 Ipswich Local Plan. The development of the site is designed not to prejudice the wet dock crossing and indeed following the decision not to pursue the three Bridges scheme, SCC has reserved up to £10.8m to help secure it or something similar. It is important to have a vehicular access to the site to accommodate emergency vehicles, should they ever be required and to ensure a link between the island site and the west bank.</p>	

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<p>Policy SP17 – Town Centre Car Parking</p>	<p>Main issue 1: Town centre car parking is a significant contributor to carbon emissions and availability of parking is a disincentive to modal shift and more sustainable travel options. To comply with national zero carbon objectives, Draft needs to acknowledge car parking is material in the overarching objective of reducing carbon emissions. Make reference to national policy and the Ipswich Climate Emergency.</p>	<p>Councillor Oliver Holmes (Rep ID: 26639)</p>	<p>Disagree for the following reasons: The Parking Strategy will result in only three additional spaces by the end of the plan period (2036). The principal aim is to re-organise parking in the Borough so that it avoids the necessity for commuters and shoppers to drive any further across the town than is required and meet demand where it is needed. The Option chosen, rationalises the existing parking facilities through providing better solutions in the right places and ending temporary car parking through the removal of the equivalent temporary car park spaces to match the number of new spaces created through the development of a new car park . The vision and objectives of the Local Plan Review are considered to reflect the wider Climate Emergency Declaration that Ipswich Borough Council has made and it is not necessary to explicitly reference this. The spatial option and strategy presented align with the Climate Emergency Declaration.</p>	
<p>Policy SP17 – Town Centre Car Parking</p>	<p>Main issue 2: Policy is based on flawed 2019 Parking Strategy. Until proper analysis, no multi-storey car parks site should be allocated.</p>	<p>Councillor Oliver Holmes (Rep ID: 26642)</p>	<p>Disagree for the following reasons: The Parking Strategy will result in only three additional spaces by the end of the plan period (2036). The principal aim is to re-organise parking in the Borough so that it avoids the necessity for commuters and shoppers to drive any further across the town than is required and meet demand where it is needed. The Option rationalises the existing parking facilities through providing better</p>	

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			<p>solutions in the right places and ending temporary car parking through the removal of the equivalent temporary car park spaces to match the number of new spaces created through the development of a new car park .</p>	
<p>Policy SP17 – Town Centre Car Parking</p>	<p>Main issue 3: We believe that the Parking Strategy over-estimates the parking demand, and hence the required land, for town centre parking and that this brownfield land would be better used for housing rather than the previously designated countryside at Humber Doucy Lane.</p>	<p>Save Our Country Spaces (Rep ID: 26395) Northern Fringe Protection Group (Rep ID: 26515)</p>	<p>Disagree for the following reasons: The Parking Strategy produced on behalf of the Council will result in only three additional spaces by the end of the plan period (2036). The principal aim is to re-organise parking in the Borough so that it avoids the necessity for commuters and shoppers to drive any further across the town than is required and meet demand where it is needed. The Option rationalises the existing parking facilities through providing better solutions in the right places and ending temporary car parking through the removal of the equivalent temporary car park spaces to match the number of new spaces created through the development of a new car park. In addition, this approach will free up temporary car parking sites for suitable sustainable development in the town.</p>	

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Policy SP17 – Town Centre Car Parking	Main issue 4: It is not clear if the Ipswich Parking Strategy has actually been approved by the IBC Executive.	Save Our Country Spaces (Rep ID: 26395) Northern Fringe Protection Group (Rep ID: 26515)	Noted: The Parking Strategy has been published as evidence for the Local Plan in the Core Document Library (D41). The implementation element is to be taken forward through an Ipswich Parking Area Plan.	
Policy SP17 – Town Centre Car Parking	Main issue 5: The parking strategy is based on substantially higher jobs (12,500) and housing (8,840) targets than set out in the CS. Therefore obsolete.	Save Our Country Spaces (Rep ID: 26395) Northern Fringe Protection Group (Rep ID: 26515)	Disagree for the following reasons: The Parking Strategy was based on the housing and jobs figures in the Adopted Local Plan (2017). The Plan subject to examination was not sufficiently advanced to carry any material weight at the time the document was produced.	
Policy SP17 – Town Centre Car Parking	Main issue 6: Parking strategy needs to take account of Climate Emergency declaration.	Save Our Country Spaces (Rep ID: 26395) Northern Fringe Protection Group (Rep ID: 26515)	Disagree for the following reasons: Extensive work to try and improve air quality has been undertaken by the Council. The draft Low Emissions SPD is to be considered by the Executive in the autumn. Policy DM22 states that "In order to reduce congestion, manage air quality and encourage a modal shift away from the car, particularly amongst the commuting public, it is important to limit long-stay car parking within the central car parking core and for organisations to encourage employees to travel to work by more sustainable means through travel planning. Therefore, only necessary operational parking will be allowed for new non-residential development within the central car parking core." Ipswich Borough Council's Climate Emergency declaration concerns its own	

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			activities as opposed to its operational requirements.	
Policy SP17 – Town Centre Car Parking	Main issue 7: Justify forecasts used by WYG parking report, and how the spatial strategy for parking responds to the WYG finding that care is needed to ensure parking provision does not encourage car use.	Suffolk County Council (Rep ID: 26640)	Agree: This request has been agreed through the draft Statement of Common Ground between SCC and IBC and resulted in modification to Policy SP17.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a29_-_ibc_scc_transport_and_parking_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a29_-_ibc_scc_transport_and_parking_socg.pdf</a>

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<p>Opportunity Area A – Island Site</p>	<p>Main issue 1: Welcome statement that Opportunity Area descriptions, development principles and plans will act as concept plans to guide the development unless evidence indicates a better approach. Note statement that allocation policies of the DPD take precedence over Opportunity Area guidance and site sheets, however, there are discrepancies between these respective parts of the DPD which would benefit from clarification. Request changes to text under “Opportunity Area A – Island Site”.</p>	<p>Associated British Ports (Rep ID: 26490)</p>	<p>Noted: Opportunity Areas, their status and the 'golden thread' through from strategic policy, allocation policy and site sheets are subject to a SoCG with HE.</p>	<p><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf</a></p>
<p>Opportunity Area B – Merchant Quarter</p>	<p>Main issue 1: Site IP054b should be extended north to cover the Cattlemarket Bus Station. This would enable the regeneration aims for this area to be met.</p>	<p>Ortona Properties Ltd (Suzanne Nugent) (Rep ID: 26242)</p>	<p>Disagree for the following reason: - The Cattlemarket Bus Station is under different ownership and to include this within IP054b would not be appropriate. In addition, although the idea of redeveloping the Cattlemarket Bus Station has been discussed historically, there is no evidence at this stage to indicate that the bus station is to cease operating.</p>	

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<p>Opportunity Area B – Merchant Quarter</p>	<p>Main issue 2: Concerned that the Development Options plan, together with the Development Principles, are not sound in that they will render development unviable and frustrate proposals to bring sites forward.</p>	<p>Cardinal Lofts (Mill Ltd) (Rep ID: 26572)</p>	<p>Disagree for the following reason: - The development principles and opportunities set out in Opportunity Area B, coupled with the relevant site allocations, are designed to guide the future development of this area. They are not a strict set of rules/ requirements that must be adhered to. They are urban design options for the area that, in the view of the Council, would likely represent an effective regeneration of this area.</p>	
<p>Opportunity Area C – Mint Quarter</p>	<p>Main issue 1: Supportive of these plans and of enhanced linkages to the Regent Theatre.</p>	<p>Theatres Trust (Rep ID: 26237)</p>	<p>Noted - no modification required.</p>	
<p>Opportunity Area C – Mint Quarter</p>	<p>Main issue 2: The requirement to 'respect and enhance setting of Listed and historic buildings' does not wholly comply with the NPPF.</p>	<p>Department for Education (in connection with allocation IP048a) (Rep ID 26549)</p>	<p>Disagree for the following reason: Paragraph 193 of the NPPF states that; "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)." It is therefore right that the Council highlights the need to respect and enhance the setting of listed and historic buildings as a development principle. Again, the development principles are not strict rules/ requirements that development must adhere to but are guiding principles of how development may come forward to achieve the regeneration aims of the Opportunity Area. It will be up to the applicant of any proposed development to demonstrate that heritage has been assessed and considered in</p>	

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			any new proposals, in accordance with policy DM13 and the relevant paragraphs of the NPPF.	
Opportunity Area E – Westgate	Main issue 1: Encourage the principles to include engagement with the Trust given the potential for impact on New Wolsey Theatre. We otherwise consider this to meet the tests of soundness.	Theatres Trust (Rep ID: 26238)	Noted - no modification required.	
Opportunity Area H – Holywells	Main issue 1: Concerned about impact of building a new block of apartments in close proximity and its impact on lives around it.	Lily Maksimovic (Rep ID: 26269)	Noted - no modification required: Opportunity Area H - Holywells introduces development opportunities for this area which include the suggestion that improved public spaces and pedestrian and cycle links could be introduced which could help to improve the lives of local residents. The development principles suggest that the scale of development here will be generally medium-rise (3-5 storeys) with taller buildings only being located in key locations. Therefore,	

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			scale and location of development will be carefully considered.	
Opportunity Area H – Holywells	Main issue 2: Parking is difficult around here.	Lily Maksimovic (Rep ID: 26269)	Noted - no modification required: Opportunity Area H - Holywells highlights the opportunity for the improvement of pedestrian and cycle links in the area which would reduce the need for car use. Additionally, Policy DM21 of the Core Strategy states that development should 'prioritise available options to enable and support travel on foot, by bicycle or public transport' and if car parking is still required at a new development, Policy DM22 states that the Council 'will expect parking to be fully integrated into the design of the scheme to provide secure and convenient facilities and create a safe and attractive environment.'	
Opportunity Area H – Holywells	Main issue 3: Concerned about impact on amenity of nearby properties.	Lily Maksimovic (Rep ID: 26269)	Noted - no modification required: Policy DM18 of the Core Strategy states that; 'The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not result in an unacceptable loss of amenity.'	

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IP009 – Victoria Nurseries, Westerfield Road	Main issue 1: Allocated since 1997 Local Plan remains undeveloped. More cautious approach to the likelihood of delivery required.	Ipswich School (Rep ID: 26597)	Disagree for the following reason: - The site only has temporary planning permission for its current use which expires 31 December 2020 and is in a higher value zone of the Borough in terms of land values according to the Whole Plan Viability Assessment (D42).	
IP010a – Co-Op Depot, Felixstowe Road	Main issue 1: Support school expansion.	Department for Education (Rep ID: 26542)	Noted - no modification required.	
IP010a – Co-Op Depot, Felixstowe Road	Main issue 2: School expansion needs 0.8ha [not the 0.5ha allocated].	Suffolk County Council (Rep ID: 26595)	Disagree for the following reason: - The percentages and site areas dedicated to the two uses of residential and education are identified as indicative. The amount of land required for each use will be subject to separate landowner discussions between the relevant parties and may be subject to change depending on these negotiations. This is noted in the draft Statement of Common Ground between the two parties.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf</a>
IP010b – Felixstowe Road	Main issue 1: Support the change of use from employment to residential.	Daniel Hudson (Rep ID: 26235)	Noted - no modification required.	

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IP010b – Felixstowe Road	Main issue 2: The existing businesses are noisy, pose a threat to highway safety and damage local roads.	Daniel Hudson (Rep ID: 26235)	Noted - no modification required. The current use of the site is for employment purposes. The proposed allocation seeks to replace some of the employment uses with residential. This will help to alleviate some of the concerns raised. The site sheet for IP010b states that a transport assessment and travel plan will be required for the site which should help to deal with highway safety issues concerning new development at the site. Additionally, Policy DM21 of the Core Strategy states that new development shall 'not result in a severe impact on the highway network or unacceptable impacts on highway safety, either individually or cumulatively.'	
IP011b – Smart Street/ Foundation Street (South)	Main issue 1: The allocation is supported by the landowner.	Ortona Properties (Sally Nugent) (Rep ID: 26245)	Noted - no modification required.	
IP011c – Smart Street/ Foundation Street (North)	Main issue 1: Archaeology wording on site sheet needs updating.	Suffolk County Council (Rep ID: 26609)	Agree for the following reason: IBC and SCC have agreed to modify the archaeology wording as per the draft SoCG. IBC have proposed slight modifications to SCC suggestions.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28-ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28-ibc_scc_infrastructure_socg.pdf</a>
IP011c – Smart Street/ Foundation Street (North)	Main issue 2: Allocated in 1997 Local Plan, has not to date come forward for development. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26599)	Disagree for the following reason: - The site is within the ownership of Ipswich Borough Council. It is currently used as a temporary car park, the use of which must cease before 6 April 2022. The Council has an active housebuilding programme and it is not unrealistic that this site could be developed.	

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<p>IP012 – Peter's Ice Cream, Grimwade Street</p>	<p>Main issue 1: Allocated in 1997 Local Plan. Whilst parts of wider site have come forward, and signs of potential development have been apparent, it is noted that the site does not yet benefit from planning permission. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.</p>	<p>Ipswich School (Rep ID: 26602)</p>	<p>Disagree for the following reason: - There have been recent permissions granted in the surrounding area, such as immediately to the north, and the site is partially cleared. There have been historic permissions on this site (2008) which indicate signs of willingness to bring the site forward.</p>	
<p>IP032 – King George V Field, Old Norwich Road</p>	<p>Main issue 1: The trustees of the King George V Field stated that the site would need to be redeveloped in its entirety. The partial re-development set out in the proposed allocation would not provide sufficient funds to properly develop a multi-purpose site.</p>	<p>King George V Field Trustees (David J Coe) (Rep ID: 26193)</p>	<p>Disagree for the following reason: - There is insufficient evidence at this stage regarding the ability to re-locate all of the playing fields at the entire site (including land to the north of IP032) into the surrounding area. The partial re-development that has been proposed is reflective of the amount of playing fields that the Council is confident can be relocated based on permission being granted in Mid Suffolk District Council immediately to the north of Whitton Sports Centre. Due to the lack of certainty regarding the other playing fields identified, these have not been proposed for redevelopment. If further evidence of the remaining playing fields being re-located is provided then this allocation may be able to be reviewed as part of a future Local Plan Review to increase the site area.</p>	

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<p>IP032 – King George V Field, Old Norwich Road</p>	<p>Main issue 2: The text in relation to the requirements for a replacement facility should be more explicit and should reflect Sport England's policy in relation to replacement playing fields (see proposed change).</p>	<p>Sport England (Rep ID: 26283)</p>	<p>Disagree for the following reason: - The supporting text within site sheet IP032 states; "Need prior provision of a replacement pitch and ancillary facilities such as changing rooms and spectator accommodation of equivalent or better quality and quantity in the locality and subject to equivalent or better accessibility and management arrangements." This wording is considered to correlate with the wording suggested by Sport England and does not need to be amended.</p>	
<p>IP035 – Key Street/ Star Lane/ Burtons (St Peter's Port)</p>	<p>Main issue 1: Believe site has potential for much greater capacity than indicated and that this increased capacity will be necessary to ensure that development is viable due to number of site constraints (archaeology, hydrology, listed buildings, land contamination, flooding, air quality, design restriction).</p>	<p>Cardinal Lofts (Mill) Ltd) (Rep ID: 26566)</p>	<p>Disagree for the following reason: The capacity for IP035 is set at a high density of 200 dwellings per hectare (on 80% of the site). Due to the varying types and levels of constraints present on this site (adjoining listed buildings, contamination, archaeology, air quality area etc), it is not considered realistic to increase the capacity on this site.</p>	
<p>IP035 – Key Street/ Star Lane/ Burtons (St Peter's Port)</p>	<p>Main issue 2: Believe there needs to be explicit reference to future development of IP035 having to incorporate car parking, for both residential units to be accommodated thereon and for further residential units to be developed on IP206 and IP211.</p>	<p>Cardinal Lofts (Mill) Ltd) (Rep ID: 26567)</p>	<p>Disagree for the following reason: It is not considered that there is a need for reference to parking need on adjacent sites such as IP035. The Council has prepared a Parking Strategy which does not include this land specifically for parking.</p>	

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<p>IP035 – Key Street/ Star Lane/ Burtons (St Peter's Port)</p>	<p>Main issue 3: Allocated in 1997 Local Plan. Site lies between two busy roads as part of one-way network, which may form constraint. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.</p>	<p>Ipswich School (Rep ID: 26603)</p>	<p>Disagree for the following reason: - The landowner of this site has written in support of the principle of the residential-led allocation at all stages of this Local Plan Review. This indicates a clear intention to develop the site.</p>	
<p>IP037 – Island Site</p>	<p>Main issue 1: Support allocation for residential/residential mixed-use, however, believe that proposed housing density is too high and should be reduced to approx. 150 units. Disagree that additional access would be required to enable development. Object to requirement of 15% open space as this is over the minimum requirement.</p>	<p>Associated British Ports (Rep ID: 26565)</p>	<p>Noted: Support for the principal uses for site is noted. Whilst it is true that the adopted Ipswich Local Plan has a lower number of dwellings proposed than this emerging Local Plan, it still only represents 100 dph which is an average density for dwellings and can be accommodated easily on the site without the need for tower blocks. Policy DM6 in the Core Strategy states that high density residential developments should provide a minimum of 15% of the site area as open space.</p>	
<p>IP037 – Island Site</p>	<p>Main issue 2: Allocated in 1997 Local Plan under site refs: 5.1 and 5.2. The need for additional access arrangements is noted and may represent constraint. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.</p>	<p>Ipswich School (Rep ID: 26605)</p>	<p>Disagree for the following reason: - The landowner of this site has written in support of the principle of the residential-led allocation at all stages of this Local Plan Review. This indicates a clear intention to develop the site. This is a key regeneration site in the Borough and there is a committed £10.8m towards an access bridge to aid deliverability.</p>	

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IP048a – Mint Quarter/ Cox Lane East Regeneration Area	Main issue 1: residential use of upper floors may not be compatible with the school.	Department for Education (Rep ID: 26547)	Disagree for the following reason: - The site sheet does not specify that the upper floor of the Carr Street façade element is to be residential. The residential component of the allocation could form other parts of the site, e.g. fronting onto Upper Orwell Street.	
IP048a – Mint Quarter/ Cox Lane East Regeneration Area	Main issue 2: the requirement to retain the façade is too restrictive.	Department for Education (Rep ID: 26547)	Disagree for the following reason: - The site sheet for IP048a is guidance and does not necessitate that the locally listed façade must be retained for development to take place. Instead it sets out that it would be desirable to be retained "if feasible".	
IP048a – Mint Quarter/ Cox Lane East Regeneration Area	Main issue 3: the requirement for a development brief is unnecessary.	Department for Education (Rep ID: 26547)	Disagree for the following reason: - There is not a requirement for a development brief as the site sheet states; "A development brief for the whole site (east and west of Cox Lane) will be prepared but development may come forward incrementally." Again, it would be preferable if a development brief could be prepared given the mix of proposed land uses and owners but it is not a requirement.	
IP048a – Mint Quarter/ Cox Lane East Regeneration Area	Main issue 4: the school should be a separate allocation.	Department for Education (Rep ID: 26547)	Disagree for the following reason: Due to the variety of access points/ rights of way running through the site and mix of uses it is considered that a larger allocation as proposed is more effective to ensuring that development can come forward without compromising other parts of the site from being accessed/ brought forward.	

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IP048a – Mint Quarter/ Cox Lane East Regeneration Area	Main issue 5: Site sheet should refer to early years provision.	Suffolk County Council (Rep ID: 26598)	Agree - This has been agreed through the draft Statement of Common Ground between IBC and SCC.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf</a>
IP054b – Land between Old Cattle Market and Star Lane	Main issue 1: Site boundary should be extended north to include the Cattlemarket Bus Station. This would ensure that the wider regeneration aims of Opportunity Area B are met.	Ortona Properties (Sally Nugent) (Rep ID: 26241)	Disagree for the following reason: - The Cattlemarket Bus Station is under different ownership and to include this within IP054b would not be appropriate. In addition, although the idea of redeveloping the Cattlemarket Bus Station has been discussed historically, there is no evidence at this stage to indicate that the bus station is to cease operating.	
IP054b – Land between Old Cattle Market and Star Lane	Main issue 2: Site allocation should be more flexible, allowing both commercial and residential development as per the adopted the local plan. Residential allocation alone is too restrictive. There should be the possibility for commercial units to remain and expand as required.	Norman Agran (Rep ID: 26319)	Disagree for the following reason: - The site is on brownfield land within the Town Centre, IP-One Area and within an Opportunity Area. The NPPF requires Local Planning Authorities to make efficient use of land and given that this site is in a highly sustainable location it is considered that a residential allocation is the optimum use for this site. This is further amplified by the fact that the Borough is a tightly drawn urban authority and has a need to try and meet its housing requirement within the boundary of the Borough. The allocation proposes housing on 60% of the site with the other 40% allocated for small scale retail uses and electricity substation.	

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IP054b – Land between Old Cattle Market and Star Lane	Main issue 3: Allocated in 1997 Local Plan as part of site refs: 5.9 and 5.10. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26606)	Disagree for the following reason: - Some of the landowners have actively engaged at all stages of the Local Plan Review which demonstrates a clear intent to develop the site.	
IP061 – Former School Site, Lavenham Road	Main issue 1: Harm to the character of the area from infilling the green open space.	Stewart McCarthy (Rep ID: 26168) Claire Sawyer (Rep ID: 26169)	Disagree for the following reasons: In response to representations made at Preferred Options the Council has increased the on-site amenity green space from 30% to 40%.	
IP061 – Former School Site, Lavenham Road	Main issue 2: Harm to the setting of the Grade II Listed Crane Manor.	Stewart McCarthy (Rep ID: 26168)	Disagree for the following reasons: The site sheet requires any development to have regard to the setting of the Grade II Listed Crane Manor. It is anticipated that the amenity green space would be located adjacent to the listed building for this purpose.	
IP061 – Former School Site, Lavenham Road	Main issue 3: The green space is used by the local community for a variety of activities and the loss of this space is negative for mental health and wellbeing.	Stewart McCarthy (Rep ID: 26168) Claire Sawyer (Rep ID: 26169) Gary Butcher (Rep ID: 26198)	Disagree for the following reasons: In response to representations made at Preferred Options the Council have increased the on-site amenity green space from 30% to 40%.	
IP061 – Former School Site, Lavenham Road	Main issue 4: Loss of view	Stewart McCarthy (Rep ID: 26168) Claire Sawyer (Rep ID: 26169)	Disagree for the following reasons: Loss of a view is not a material planning consideration. The Council has sought to retain 40% of the site as amenity green space which would help to retain an attractive outlook for residents.	

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<p>IP061 – Former School Site, Lavenham Road</p>	<p>Main issue 5: Harm to neighbouring properties in terms of noise disturbance, light pollution, loss of light, loss of privacy, overshadowing and construction-related activities.</p>	<p>Stewart McCarthy (Rep ID: 26168) Claire Sawyer (Rep ID: 26169)</p>	<p>Disagree for the following reasons: The Council will seek to ensure that the development is designed in such a way so as not to adversely affect the residential amenity of local residents. Policy DM18 of the Core Strategy states that; 'The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not result in an unacceptable loss of amenity.'</p>	
<p>IP061 – Former School Site, Lavenham Road</p>	<p>Main issue 6: Anti-social behaviour related to the development.</p>	<p>Stewart McCarthy (Rep ID: 26168)</p>	<p>Disagree for the following reasons: It is not anticipated that the development will result in an increase in anti-social behaviour. The development will retain an area of green space on 40% of the site for public use.</p>	
<p>IP061 – Former School Site, Lavenham Road</p>	<p>Main issue 7: Increased traffic congestion, parking issues and emergency access issues arising from new development.</p>	<p>Stewart McCarthy (Rep ID: 26168) Gary Butcher (Rep ID: 26198)</p>	<p>Disagree for the following reasons: The Council anticipate that the site can come forward without causing undue harm to the neighbouring properties. The Council will require sufficient car parking provision to be delivered on site, in order to limit the impact on the existing road network. The addition of 30 dwellings is not anticipated to have a significant adverse effect on the highway network or ability of emergency service vehicles to access the area. The Council will ensure the site is planned in a way which allows emergency vehicles to access the site and does not prejudice existing access routes.</p>	

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IP061 – Former School Site, Lavenham Road	Main issue 8: Inadequate local infrastructure to service the proposed development.	Stewart McCarthy (Rep ID: 26168) Claire Sawyer (Rep ID: 26169)	Disagree for the followings reasons: The Council consider that the local infrastructure can support the addition of 23 additional homes on the site.	
IP061 – Former School Site, Lavenham Road	Main issue 9: residents weren't consulted on the planning application on part of the site.	Claire Sawyer (Rep ID: 26169)	Disagree for the following reasons: The planning application for the residential care home was dealt with by Suffolk County Council and any concerns about the handling of the application should be directed to Suffolk County Council as the determining authority.	
IP061 – Former School Site, Lavenham Road	Main issue 10: Harm to local wildlife and presence of bats not picked up in Wildlife Audit.	Gary Butcher (Rep ID: 26198)	Disagree for the following reasons: The Council will require development to achieve biodiversity net gain and take into consideration the recommendations of the Ipswich Wildlife Audit 2019.	
IP089 – Waterworks Street	Main issue 1: Archaeology wording on site sheet needs updating.	Suffolk County Council (Rep ID: 26618)	Agree for the following reason: IBC and SCC have agreed to modify the archaeology wording as per the draft SoCG	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_ibc_scc_infrastructure_socg.pdf</a>

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<p>IP098 – Transco south of Patteson Road</p>	<p>Main issue 1: Concerned about impact of building a new block of apartments in close proximity and its impact on lives around it.</p>	<p>Lily Maksimovic (Rep ID: 26270)</p>	<p>Noted - no modification required: The site sheet states that thought will need to be given to the appearance of the proposed buildings to ensure they "have active elevations to both Patteson Road and Cliff Road which provide visual interest to the street scene' and 'high quality design and finish of development is expected to respond positively to the character of the area, and enhance the setting of the adjacent Conservation Areas". Therefore, the scale and appearance of the building will be carefully designed to respond to the surrounding area. The site is also located within the Holywells Opportunity Area H which "presents an opportunity to link the Waterfront area to the green lung and to improve integration with the residential areas to the east." The development opportunities for this area suggest that improved public spaces and pedestrian and cycle links could be introduced which could help to improve the lives of local residents. The principles suggest that the scale of development here will generally medium-rise (3-5 storeys) with taller buildings only being located in key locations.</p>	
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<p>IP098 – Transco south of Patteson Road</p>	<p>Main issue 2: Parking is difficult around here.</p>	<p>Lily Maksimovic (Rep ID: 26270)</p>	<p>Noted - no modification required: The site is located within the Holywells Opportunity Area H which highlights the opportunity for the improvement of pedestrian and cycle links in the area which would reduce the need for car use. Additionally, Policy DM21 of the Core Strategy states that development should "prioritise available options to enable and support travel on foot, by bicycle or public transport" and if car parking is still required at a new development, Policy DM22 states that the Council "will expect parking to be fully integrated into the design of the scheme to provide secure and convenient facilities and create a safe and attractive environment."</p>	
<p>IP098 – Transco south of Patteson Road</p>	<p>Main issue 3: Concerned about impact on amenity of nearby properties.</p>	<p>Lily Maksimovic (Rep ID: 26270)</p>	<p>Noted - no modification required: The site sheet states that thought will need to be given to the appearance of the proposed buildings to ensure they "have active elevations to both Patteson Road and Cliff Road which provide visual interest to the street scene" and "high quality design and finish of development is expected to respond positively to the character of the area, and enhance the setting of the adjacent Conservation Areas". Therefore, the scale and appearance of the building will be carefully designed to respond to the surrounding area. Additionally, Policy DM18 of the Core Strategy states that; "The Council will protect the quality of life of occupiers and neighbours by only granting</p>	

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			permission for development that does not result in an unacceptable loss of amenity."	
IP132 – Former St Peter's Warehouse, 4 Bridge Street	Main issue 1: Allocated in 1997 Local Plan as part of site ref: 5.3. Lengthy vacancy with no signs of coming forward, despite allocation since 1997. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26607)	Disagree for the following reason: - The site is owned by Ipswich Borough Council and there is a planning application and listed building consent on the listed building in the North-West corner to partially re-develop the site. The site forms the gateway to the Waterfront and the public realm improvements to St Peter's Dock have recently been completed. Site IP205 immediately to the east was recently granted permission for a redevelopment which is also owned by Ipswich Borough Council. The site is within an opportunity area and a key regeneration site.	
IP136 – Silo, College Street	Main issue 1: Fire damaged buildings and lengthy vacancy with no signs of coming forward, despite allocation since 1997. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26608)	Disagree for the following reason: - The site is on the gateway to the Waterfront and the public realm improvements have recently been completed. Site IP205 immediately to the east was also owned by Ipswich Borough Council. The site is also owned by Ipswich Borough Council. The site is within an opportunity area and a key regeneration site.	

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IP141a – Land at Futura Park, Nacton Road (formerly the Cranes Site)	Main issue 1: The site is close to the AONB and the need for an assessment of the impact on the AONB should be reflected in the policy text.	AONB Unit (Rep ID: 26259)	Agree for the following reasons: The site sheet states that surveys for reptiles, bats and detailed terrestrial invertebrate surveys are required. This should also include reference to the AONB which is similarly close by.	<a href="#">See IP141a Land at Futura Park, Nacton Road (formerly the Cranes Site)</a>
IP141a – Land at Futura Park, Nacton Road (formerly the Cranes Site)	Main issue 2: Suggest, site allocation could be considered for removal. No interest in Site 1 despite extensive marketing and designation within New Anglia Enterprise Zone. Site 1 shouldn't be restricted to Class B uses - subject to different townscape character due to relationship with Ravenswood and Nacton Road. Developing plans for site 3 meet B Class demands. If allocation not removed, suggest changes to constraints/issues text to ensure plan allows schemes to be justified on their own merits and to provide flexibility to support the delivery of site 1.	AquiGen (Rep ID: 26433)	Disagree for the following reason: - Planning permission (20/00137/FUL) was granted in February 2020 for a B2/B8 warehouse on the north-eastern half of site IP141a(1). This demonstrates that this site is capable of delivering employment development and therefore should not be removed. The wider site IP141a(1) is among the highest scoring and readily available employment sites in the Borough as identified in the Employment Land Supply Assessment (2018).	
IP149 – Pond Hall Farm	Main issue 1: Allocation is supported.	AONB Unit (Rep ID: 26268)	Noted - no modification required.	
IP150b – Land south of Ravenswood	Main issue 1: Access to the Sports Park will need to be specified as it is not clear.	Ravenswood Residents Association (Rep ID: 26176)	Noted: SCC has been tasked with identifying strategic highway options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality. It will address any short term highway issues too. Therefore, no change to the site allocation is considered necessary.	

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IP150b – Land south of Ravenswood	Main issue 2: Floodlighting has the potential to harm the AONB. The AONB is not identified as a constraint. The need to assess impact on the AONB needs to be identified.	AONB Unit (Rep ID: 26267)	Agree for the following reasons: The site sheet for IP150b states that further assessments would need to be undertaken to ensure that development proposals would not harm ecology on site and at nearby European protected sites. This should also include reference to the AONB which is similarly close by.	<a href="#">See IP150b Land South of Ravenswood</a>
IP150b – Land south of Ravenswood	Main issue 3: The split between private and social housing needs to be in line with the rest of the estate. We do not want a repeat or the UVW situation where the land was earmarked 100% social.	Claire Talbot (Rep ID: 26465)	Noted: The development will accommodate an appropriate mix of housing to reflect Policy CS8 and the Strategic Housing Market Assessment which identifies the housing needs for Ipswich over the plan period.	
IP150b – Land south of Ravenswood	Main issue 4: Traffic issues need to be considered, traffic already backs up daily at the McDonald's roundabout before additional housing. So would there be another entrance/exit?	Claire Talbot (Rep ID: 26465)	Disagree for the following reasons: SCC has been tasked with identifying strategic highway options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality. It will address any short term highway issues too.	
IP150b – Land south of Ravenswood	Main issue 5: Concerns over disruption to and loss of wildlife.	Claire Talbot (Rep ID: 26465)	Noted - no modification required: The site sheet for IP150b highlights the wildlife potential of the site and states that ecological surveys would be required to assess the existing species present. The site sheet also notes that biodiversity net gain will need to be achieved on site in line with Policy DM8 of the Core Strategy. It also notes that the recommendations of the Ipswich Wildlife Audit 2019 could be incorporated into future development and that part of the existing	

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			wildlife network and wildlife corridors should be safeguarded within future proposals.	
IP150b – Land south of Ravenswood	Main issue 6: Instead of a skate park, an extension of the country park would give a space for recreation as well as maintaining wildlife.	Claire Talbot (Rep ID: 26465)	Noted - no modification required: This allocation is carried forward from the Adopted Ipswich Local Plan. The Council's Public Open Space SPD 2017 identifies a deficit of outdoor sports provision in the South East area. The site sheet for IP150b suggests that the site has potential wildlife interest and that ecological surveys would be required before any work took place. These would likely outline potential mitigation. Additionally, the site sheet suggests that part of the existing wildlife network and wildlife corridors should be safeguarded within future proposals.	
IP150b – Land south of Ravenswood	Main issue 7: The Sports Park proposal is vague and unjustified. The plan does not explain what a sports park is or how the ecological impacts of its development would be mitigated. Delete IP150b sports park.	Ravenswood Environmental Group (Rep ID: 26636)	Disagree for the following reasons: This allocation is carried forward from the Adopted Ipswich Local Plan. The Council's Public Open Space SPD 2017 identifies a deficit of outdoor sports provision in the South East area. The site sheet for IP150b suggests that the site has potential wildlife interest and that ecological surveys would be required before any work took place. These would likely outline potential mitigation. Additionally, the site	

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			sheet suggests that part of the existing wildlife network and wildlife corridors should be safeguarded within future proposals.	
IP150c – Land south of Ravenswood	Main issue 1: Object to the proposed allocation.	Ravenswood Residents Association (Rep ID: 26174)	Disagree for the following reasons: Needed to meet the employment needs of the Borough.	
IP150c – Land south of Ravenswood	Main issue 2: Insufficient traffic capacity to cope with existing traffic demands. Additional development would exacerbate this.	Ravenswood Residents Association (Rep ID: 26174)	Disagree for the following reasons: SCC has been tasked with identifying strategic highways options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood .It will address any short term highway issues too.	
IP150c – Land south of Ravenswood	Main issue 3: Is the access to this site via allocation IP150e? If so, it will need to be master planned.	Ravenswood Residents Association (Rep ID: 26174)	Disagree for the following reasons: SCC has been tasked with identifying strategic highways options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood .It will address any short term highway issues too.	

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IP150c – Land south of Ravenswood	Main issue 4: A second access road into Ravenswood for the whole of Ravenswood, not just the new sites, is needed. This could potentially come from the existing private road to the south.	Ravenswood Residents Association (Rep ID: 26174)	Disagree for the following reasons: SCC has been tasked with identifying strategic highways options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood .It will address any short term highway issues to.	
IP150c – Land south of Ravenswood	Main issue 5: The plan proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Master planning and EIA must be insisted upon.	Ravenswood Environmental Group (Rep ID: 26630)	Disagree for the following reasons: The indicative capacities for sites IP152 and IP150c have been derived from the calculations from the 2016 Employment Land Needs Assessment in terms of employment density. The indicative floorspace amounts are based on the type of employment uses proposed (e.g. B1, B2, B8) and the site areas. These figures are similar, but updated, from the Homes and Community Agency calculations in 2010. The sites will be subject to master planning and ensuring safe and effective access will be part of this exercise. SCC has been tasked with identifying strategic highways options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood. SCC will address any short term highway issues too. The need for an Environmental Impact Assessment will be dictated by the detail of any planning application and the Town and Country	

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			Planning (Environmental Impact Assessment) Regulations 2017.	
IP150d – Land south of Ravenswood	Main issue 1: Object to the proposed allocation.	Chris Warhurst (Rep ID: 26164) Ravenswood Residents Association (Rep ID: 26172) Hallowtree Scout Activity Centre (Rep IDL 26185) Ravenswood Environmental Group (Rep ID: 26338)	Noted - no modification required. Specific points raised by these organisations to justify their position is dealt with elsewhere in this spreadsheet.	

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IP150d – Land south of Ravenswood	Main issue 2: Protected species have been seen on the site.	Chris Warhurst (Rep ID: 26164) Ravenswood Environmental Group (Rep ID: 26338)	Noted - no modification required: The site sheet notes that the site has potential wildlife interest and that ecological, reptile and invertebrate surveys will be required before any work can take place.	
IP150d – Land south of Ravenswood	Main issue 3: Insufficient traffic capacity to cope with existing traffic demands. Additional development would exacerbate this.	Chris Warhurst (Rep ID: 26164) Ravenswood Residents Association (Rep ID: 26172) Hallowtree Scout Activity Centre (Rep IDL 26185)	Disagree for the following reasons: SCC has been tasked with identifying strategic highway options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood. It will address any short term highway issues too.	
IP150d – Land south of Ravenswood	Main issue 4: Insufficient local services/ amenities capacity (doctors, dentists and school).	Chris Warhurst (Rep ID: 26164) Ravenswood Residents Association (Rep ID: 26172) Sally Wainman (Rep ID: 26179)	Disagree for the following reasons: All new development has to ensure that it provides for the impact of potential residents on the capacity of existing community services and infrastructure.	

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IP150d – Land south of Ravenswood	Main issue 5: Inadequate sewage and drainage capacity to cope with new development.	Chris Warhurst (Rep ID: 26164)	<p>Disagree for the following reason: - IBC commissioned a Cross Boundary Water Cycle Study jointly with East Suffolk Council to understand the impact of likely development on the water environment which includes wastewater infrastructure. This included a level of growth that was in fact higher than that proposed in the submission version of the Local Plan Review due to it being drafted at an earlier stage of plan preparation. The outcome of this Study was that the Water Recycling Centres affected by growth in Ipswich Borough over the Local Plan period can accommodate the level of growth proposed with no additional sewage infrastructure that needs including at this point of the Local Plan Review. Any site specific sewage and/or drainage improvement will be identified as part of any Ravenswood specific future planning applications if required.</p> <p>- Anglian Water have been involved in the preparation of the above mentioned Cross Boundary Water Cycle Study, as well as throughout each stage of the Local Plan Review consultation. The result of this has been the agreement of a Statement of Common Ground.</p>	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/revised_08-06-20_a24_-_statement_of_common_ground_with_anglian_water_red_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/revised_08-06-20_a24_-_statement_of_common_ground_with_anglian_water_red_0.pdf</a>
IP150d – Land south of Ravenswood	Main issue 6: A mix of private and affordable homes are needed.	Ravenswood Residents Association (Rep ID: 26172)	Noted: The development will accommodate an appropriate mix of housing to reflect Policy CS8 and Strategic Housing Market Assessment which identifies the housing needs for Ipswich over the plan period.	

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IP150d – Land south of Ravenswood	Main issue 7: Does “Highway Network” just refer to the Nacton road/ Thrasher Roundabout or does it cover all roads?	Ravenswood Residents Association (Rep ID: 26172)	Disagree for the following reasons: SCC has been tasked with identifying strategic highway options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood. It will address any short term highway issues too.	
IP150d – Land south of Ravenswood	Main issue 8: A second access road into Ravenswood for the whole of Ravenswood, not just the new sites, is needed. This could potentially come from the existing private road to the south.	Ravenswood Residents Association (Rep ID: 26172)	Disagree for the following reasons: SCC has been tasked with identifying strategic highway options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood .It will address any short term highway issues too.	
IP150d – Land south of Ravenswood	Main issue 9: The AONB would be negatively affected by the additional vehicular traffic.	Hallowtree Scout Activity Centre (Rep IDL 26185)	Agree for the following reasons: The site sheet for IP150d states that further assessments would need to be undertaken regarding nearby European protected sites. This should also include reference to the AONB which is similarly close by.	<a href="#">See IP150d Land South of Ravenswood</a>
IP150d – Land south of Ravenswood	Main issue 10: The land must be kept undisturbed to allow flora and fauna to develop.	Hallowtree Scout Activity Centre (Rep IDL 26185) Ravenswood Environmental Group (Rep ID: 26338)	Disagree for the following reasons: The proposals for the site are low density and could allow for some retention of natural habitat on site. In relation to the site, the Suffolk Wildlife Audit 2019 states that "new development should retain as much of the existing habitat as possible and integrate it within a landscaping scheme, in particular areas of scrub and grassland mosaic, ideally maintaining the wildlife corridor throughout	

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			<p>this area." The site is also part of a number of sites allocated in this area, across which it is recommended that existing wildlife corridors should be safeguarded within future proposals so that existing wildlife networks can be retained.</p>	
IP150d – Land south of Ravenswood	<p>Main issue 11: Needs to be master planned with other sites as part of one mixed use criteria based policy.</p>	<p>Ravenswood Environmental Group (Rep ID: 26338)</p>	<p>Noted: Policy CS2 acknowledges the need for master planning and it would be expected that this process would take a joined up approach to consider all the allocated sites in Ravenswood as part of this master planning process.</p>	
IP150d – Land south of Ravenswood	<p>Main issue 12: Proposed for 34 homes but its contrived and unjustified shape demonstrates that it cannot accommodate 34 homes as frontage development.</p>	<p>Ravenswood Environmental Group (Rep ID: 26338)</p>	<p>Disagree for the following reasons: The design of the site is such to accommodate the existing swales which lie to the front. 34 units can be accommodated by use of town houses, flats etc and the density reflects the 35-38dph that the rest of Ravenswood has been constructed at.</p>	
IP150d – Land south of Ravenswood	<p>Main issue 13: Remainder of Ravenswood community has been built out, but several parcels remain undeveloped. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.</p>	<p>Ipswich School (Rep ID: 26610)</p>	<p>Disagree for the following reasons: All the land allocated is under the control of the Borough and ownership extends far beyond the limit of the allocations.</p>	

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IP150e – Land south of Ravenswood	Main issue 1: Object to the proposed allocation.	Ravenswood Residents Association (Rep ID: 26171) Hillary Scott (Rep ID: 26182) Helen Abbott (Rep ID: 26183) Jacky Robson (Rep ID: 26184) Hallowtree Scout Activity Centre (Rep IDL 26185) Bashar Shatta (Rep ID: 26187) Mr Jonathan N/A (Rep ID: 26192) Cindy Lawes (Rep ID: 26197)	Noted - no modification required. Specific points raised by these organisations to justify their position is dealt with elsewhere in this spreadsheet.	
IP150e – Land south of Ravenswood	Main issue 2: A mix of private and affordable homes are needed.	Ravenswood Residents Association (Rep ID: 26171) Mr Jonathan N/A (Rep ID: 26192)	Noted: The development will accommodate an appropriate mix of housing to reflect Policy CS8 and the Strategic Housing Market Assessment which identifies the housing needs for Ipswich over the plan period.	

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IP150e – Land south of Ravenswood	Main issue 3: Insufficient traffic capacity to cope with existing traffic demands. Additional development would exacerbate this.	Ravenswood Residents Association (Rep ID: 26171)Hillary Scott (Rep ID: 26182) Helen Abbott (Rep ID: 26183) Jacky Robson (Rep ID: 26184) Hallowtree Scout Activity Centre (Rep IDL 26185) Bashar Shatta (Rep ID: 26187) Mr Jonathan N/A (Rep ID: 26192) Cindy Lawes (Rep ID: 26197)	Disagree for the following reasons: SCC has been tasked with identifying strategic highway options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood .It will address any short term highway issues too.	
IP150e – Land south of Ravenswood	Main issue 4: Insufficient local services/ amenities capacity (doctors, dentists and school).	Ravenswood Residents Association (Rep ID: 26171) Sally Wainman (Rep ID: 26180) Cindy Lawes (Rep ID: 26197)	Disagree for the following reasons: All new development has to ensure that it provides for the impact of potential residents on the capacity of existing community services. In addition, officers have been in consultation with health providers; SCC about school needs etc to ensure that any needs arising can be met.	
IP150e – Land south of Ravenswood	Main issue 5: Does “Highway Network” just refer to the Nacton road/ Thrasher Roundabout or does it cover all roads?	Ravenswood Residents Association (Rep ID: 26171)	Noted: SCC has been tasked to provide a set of options to consider access comprehensively to ensure successful delivery of the sites allocated within Ravenswood.	

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IP150e – Land south of Ravenswood	Main issue 6: A second access road into Ravenswood for the whole of Ravenswood, not just the new sites, is needed. This could potentially come from the existing private road to the south.	Ravenswood Residents Association (Rep ID: 26171) Helen Abbott (Rep ID: 26183) Jacky Robson (Rep ID: 26184) Mr Jonathan N/A (Rep ID: 26192)	Noted: SCC has been tasked to provide a set of options to consider access comprehensively to ensure successful delivery of the sites allocated within Ravenswood. However SCC consider that the existing private road to the south would not form part of this solution as it will contribute negatively to the existing traffic issues in Nacton Road.	
IP150e – Land south of Ravenswood	Main issue 6: New homes should be built in central Ipswich rather than on green land in the outskirts as this is bad for wildlife, climate change and traffic pollution/ congestion. The area is overpopulated already.	Ravenswood Residents Association (Rep ID: 26171)	Disagree for the following reasons: - It is agreed that town centre housing is preferential from a sustainable development perspective. This is reflected in the Council's preferred Spatial Option and Strategy for growth in the Sustainability Appraisal. The Sustainability Appraisal did also assess changing the use of existing land in the Borough to housing as a spatial option in of itself. However, this was rejected because it performed more poorly than the preferred spatial option in terms of impacts on poverty and exclusion, air quality, town centres, transport and movement etc. However, the Council has exhausted the deliverable sites within the town centre and therefore land at Ravenswood is required to help meet the identified objectively assessed housing need.	

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IP150e – Land south of Ravenswood	Main issue 7: A park or a lake is more appropriate to enhance the area.	Ravenswood Residents Association (Rep ID: 26171)	Disagree for the following reasons: As per the policies within the Core Strategy the development will need to incorporate open space and SuDS solutions. This could incorporate a pond area with planting alongside the residential development allocated. The site is also part of a number of sites allocated in this area, across which it is recommended that existing wildlife corridors should be safeguarded within future proposals so that existing wildlife networks can be retained.	
IP150e – Land south of Ravenswood	Main issue 8: The AONB would be negatively affected by the additional vehicular traffic.	Hallowtree Scout Activity Centre (Rep IDL 26185)	Agree for the following reasons: The site sheet for IP150e states that further assessments would need to be undertaken regarding nearby European protected sites. This should also include reference to the AONB which is similarly close by.	<a href="#">See IP150e Land South of Ravenswood</a>
IP150e – Land south of Ravenswood	Main issue 9: The land must be kept undisturbed to allow flora and fauna to develop.	Hallowtree Scout Activity Centre (Rep IDL 26185)	Disagree for the following reasons: The proposals for the site are low density and could allow for some retention of natural habitat on site. In relation to the site, the Suffolk Wildlife Audit 2019 states that "new development should retain as much of the existing habitat as possible and integrate it within a landscaping scheme, in particular areas of scrub and grassland mosaic, ideally maintaining the wildlife corridor throughout this area." The site is also part of a number of sites allocated in this area, across which it is recommended that existing wildlife corridors	

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			should be safeguarded within future proposals so that existing wildlife networks can be retained.	
IP150e – Land south of Ravenswood	Main issue 10: A second access road will not solve the traffic problems.	Cindy Lawes (Rep ID: 26197)	Disagree for the following reasons: SCC has been tasked with identifying strategic highway options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood .It will address any short term highway issues too.	
IP150e – Land south of Ravenswood	Main issue 11: Allocated in 1997 Local Plan, as part of site ref 6.1. Remainder of Ravenswood community has been built out but several parcels remain undeveloped. It is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period.	Ipswich School (Rep ID: 26614)	Disagree for the following reasons: All the land allocated is under the control of the Borough and ownership extends far beyond the limit of the allocations.	
IP152 – Airport Farm Kennels, north of the A14	Main issue 1: Object to allocation	Ravenswood Residents Association (Rep ID: 26175)	Noted: See representation responses below.	

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IP152 – Airport Farm Kennels, north of the A15	Main issue 2: Insufficient traffic capacity to cope with existing traffic demands. Additional development would exacerbate this. The development poses access constraints which would need to be master planned with the adjacent IP150c and IP150e sites.	Ravenswood Residents Association (Rep ID: 26175)	Disagree for the following reasons: SCC has been tasked with identifying strategic highway options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood .It will address any short term highway issues too.	
IP152 – Airport Farm Kennels, north of the A16	Main issue 3: A second access road into Ravenswood for the whole of Ravenswood, not just the new sites, is needed. This could potentially come from the existing private road to the south.	Ravenswood Residents Association (Rep ID: 26175)	Disagree for the following reasons: SCC has been tasked with identifying strategic highway options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood .It will address any short term highway issues too.	
IP152 – Airport Farm Kennels, north of the A17	Main issue 4: Owner of site IP152 objects to Park and Ride use on this site.	JPL Properties LLP (Mr James Little) (Rep ID: 26191)	Disagree for the following reasons: - The primary allocation of this site is for employment use. The Site Allocations DPD only commits to investigate the feasibility of a Park and Ride at this site, unlike the Anglia Parkway site to the north of the Borough which is actually safeguarded. The feasibility work will be the subject of more detailed work in consultation with Suffolk County Council and dependent on other streams of work such as the County wide Local Transport Plan. It is considered that, subject to the above feasibility, a park and ride use in this location may help to achieve sustainable transport goals.	

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<p>IP152 – Airport Farm Kennels, north of the A18</p>	<p>Main issue 5: The plan proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Master planning and EIA must be insisted upon.</p>	<p>Ravenswood Environmental Group (Rep ID: 26630)</p>	<p>Disagree for the following reasons: The indicative capacities for sites IP152 and IP150c have been derived from the calculations from the 2016 Employment Land Needs Assessment in terms of employment density. The indicative floorspace amounts are based on the type of employment uses proposed (e.g. B1, B2, B8) and the site areas. These figures are similar, but updated, from the Homes and Community Agency calculations in 2010. The sites will be subject to master planning and ensuring safe and effective access will be part of this exercise. SCC has been tasked with identifying strategic highways options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood. SCC will address any short term highway issues too. The need for an Environmental Impact Assessment will be dictated by the detail of any planning application and the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.</p>	
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IP307 – Prince of Wales Drive	Main issue 1: Representatives objected to the proposed residential allocation.	Rosemarie Cornish (Rep ID: 26162) Frank King (Rep ID: 26163) Terry Forster (Rep ID: 26166) Paul Harvey (Rep ID: 26167) Lisa Magor (Rep ID: 26165)	Disagree for the following reasons: It is a brownfield site within 400m of the Maidenhall Local Centre making it a sustainable location. The NPPF encourages the efficient use of brownfield land in sustainable locations. The existing retail units have been partially empty or on short term leases and there are district and local centres nearby. Therefore it is considered that a residential use here would make better use of the site. There is also a pending application (20/00367/FUL) for a residential development of this site.	
IP307 – Prince of Wales Drive	Main issue 2: Concerns stated that the proposal would be too dense, an overdevelopment of the site and out of character with the surrounding area.	Rosemarie Cornish (Rep ID: 26162) Frank King (Rep ID: 26163) Terry Forster (Rep ID: 26166) Paul Harvey (Rep ID: 26167)	Disagree for the following reasons: The site is located within 800m of the Stoke Park District Centre. Policy DM23 states that within 800m of District Centres development is expected to achieve an average of 45dph. The indicative capacity accords with this policy.	
IP307 – Prince of Wales Drive	Main issue 3: Concerns raised regarding the harm that development would cause to the amenity of neighbouring properties (loss of light/ overshadowing, visual enclosure/ overbearing, overlooking/ loss of privacy, noise and disturbance during redevelopment).	Rosemarie Cornish (Rep ID: 26162) Terry Forster (Rep ID: 26166)	Noted - no modification required: Policy DM18 of the Core Strategy states that the Council "will protect the quality of life of occupiers and neighbours by only granting permission for development that does not result in an unacceptable loss of amenity." Development proposals will need to demonstrate that they will not result in excessive loss of light/overshadowing, visual enclosure/overbearing, overlooking/loss of privacy etc.	

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IP307 – Prince of Wales Drive	Main Issue 4: Representatives objected on the grounds of insufficient car parking in the area, the loss of car parking already on the site and the impact of parking on the surrounding streets.	Rosemarie Cornish (Rep ID: 26162) Frank King (Rep ID: 26163) Terry Forster (Rep ID: 26166) Paul Harvey (Rep ID: 26167)	Noted - no modification required: The site sheet suggests that a transport assessment and travel plan may be required for redevelopment of the site. Additionally, Policy DM21 of the Core Strategy states that development should "prioritise available options to enable and support travel on foot, by bicycle or public transport." If car parking is required, Policy DM22 states that the Council "will require adopted standards of car and cycle parking to be complied with in all new development" outside the IP-One Area and will "expect parking to be fully integrated into the design of the scheme to provide secure and convenient facilities." Therefore, the development will be required to provide appropriate parking and transport options which do not exacerbate existing pressures.	
IP307 – Prince of Wales Drive	Main issue 5: There are high volumes of traffic already present in area, exacerbated by Halifax School drop-off and pick-up times.	Rosemarie Cornish (Rep ID: 26162) Frank King (Rep ID: 26163) Terry Forster (Rep ID: 26166) Paul Harvey (Rep ID: 26167)	Noted - no modification required: The site sheet suggests that a transport assessment and travel plan may be required for redevelopment of the site. Additionally, Policy DM21 of the Core Strategy states that development should "prioritise available options to enable and support travel on foot, by bicycle or public transport." If car parking is required, Policy DM22 states that the Council "will require adopted standards of car and cycle parking to be complied with in all new development" outside the IP-One Area and will "expect parking to be fully integrated into the design of the scheme to provide secure	

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			and convenient facilities." Therefore, the development will be required to provide appropriate parking and transport options which do not exacerbate existing pressures.	
IP307 – Prince of Wales Drive	Main issue 6: The shop is a valuable community asset and shouldn't be lost.	Rosemarie Cornish (Rep ID: 26162) Terry Forster (Rep ID: 26166)	Disagree for the following reasons: The site is located within 800m of the Stoke Park District Centre. The site sheet for IP307 notes that there are currently vacant retail units at the site.	
IP307 – Prince of Wales Drive	Main issue 7: Loss of views out towards River Orwell.	Rosemarie Cornish (Rep ID: 26162) Frank King (Rep ID: 26163)	Noted - no modification required: The site sheet acknowledges the glimpsed views across the Orwell and suggests that "the creation of new sightlines across the estuary would be encouraged to be incorporated in the development of this site."	
IP307 – Prince of Wales Drive	Main issue 8: Loss of green and harm to biodiversity/ protected species.	Rosemarie Cornish (Rep ID: 26162)	Noted - no modification required: The existing site is of low biodiversity value. The requirement for biodiversity net gain in Policy DM8 of the Core Strategy would mean that additional habitat would need to be provided on site. The site sheet suggests that the recommendations of the Ipswich Wildlife Audit 2019 could be incorporated into future development to improve biodiversity on site.	

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			Therefore, redevelopment of the site could result in a better provision of green space.	
IP307 – Prince of Wales Drive	Main issue 9: Objects to proposed redevelopment at the allocated site due to pressures on parking along Chatsworth Crescent/Prince of Wales Drive, congestion along roads at school time and the scale of proposed residential buildings in relation to existing architecture.	Mr. Forster (Rep ID: 26296)	Noted - no modification required: The site sheet suggests that a transport assessment and travel plan may be required for redevelopment of the site. Additionally, Policy DM21 in the Core Strategy states that development should "prioritise available options to enable and support travel on foot, by bicycle or public transport." If car parking is required, Policy DM22 states that the Council "will require adopted standards of car and cycle parking to be complied with in all new development" outside the IP-One Area and will "expect parking to be fully integrated into the design of the scheme to provide secure and convenient facilities." Therefore, the development will be required to provide appropriate parking and transport options which do not exacerbate existing pressures. The site sheet suggests that the architecture surrounding the site "includes some attempts at producing distinctive and varied designs" and that "this innovative approach to architectural design would be encouraged in the development of this allocation site."	

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<p>IP309 – Former Bridgeward Social Club, 68a Austin Street</p>	<p>Main issue 1: Support allocation as a suitable site for residential development, well located with accessible transport links and close to local amenities. Intention to redevelop site with high quality scheme including affordable housing. Keen to work with IBC to develop appropriate approach in order to maximise development whilst respecting local environment.</p>	<p>Austin Street Projects Ltd (Rep ID: 26344)</p>	<p>Noted - no modification required.</p>	
<p>IP354 – 72 (Old Boatyard) Cullingham Road</p>	<p>Main issue 1: Existing parking pressures and access concerns on Cullingham Road due to lack of existing off-road parking, new housing would add additional parking problems as new residents likely to have two vehicles.</p>	<p>Carole and Christopher Williamson (Rep ID: 26199) Stephen Morgan (Rep ID: 26235) Tim Leggett (Rep ID: 26258) Margaret Pearson (Rep ID: 26273)</p>	<p>Disagree for the following reason: - If an application for development were submitted it would need to demonstrate that it would not have a detrimental impact on the amenity of neighbours and would not pose a threat to highway safety. It is pertinent to note that as the site is in the IP-One Area, the parking standards will be maximum only. The site is located in a sustainable location, close to public transport links and services/ amenities and future occupiers will not be dependent on the private car as the main means of transport.</p>	

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<p>IP354 – 72 (Old Boatyard) Cullingham Road</p>	<p>Main issue 2: Concern about traffic pollution from construction vehicles.</p>	<p>Carole and Christopher Williamson (Rep ID: 26199) Stephen Morgan (Rep ID: 26234) Tim Leggett (Rep ID: 26258) Margaret Pearson (Rep ID: 26273)</p>	<p>Disagree for the following reason: - This would be managed through a construction management plan as part of a future planning application.</p>	
<p>IP354 – 72 (Old Boatyard) Cullingham Road</p>	<p>Main issue 3: Concern was raised that the change of use would cause noise and disruption at evenings and weekends in a quiet location.</p>	<p>Carole and Christopher Williamson (Rep ID: 26199) Stephen Morgan (Rep ID: 26234) Margaret Pearson (Rep ID: 26273)</p>	<p>Disagree for the following reason: - The allocation proposed is for residential use and this would fit in with the surrounding residential context.</p>	
<p>IP354 – 72 (Old Boatyard) Cullingham Road</p>	<p>Main issue 4: Concern over loss of wildlife habitat, need to be encouraging wildlife. Great crested newts.</p>	<p>Carole and Christopher Williamson (Rep ID: 26199) Stephen Morgan (Rep ID: 26234) Tim Leggett (Rep ID: 26258) Margaret Pearson (Rep ID: 26273)</p>	<p>Disagree for the following reason: - The wildlife audit carried out on this and the adjoining sites identified that the area was sub-optimal for invertebrates. Nevertheless, the site sheet identifies the adjacent river wildlife corridor and any application would need to demonstrate compliance with policy DM8 which requires a net increase in biodiversity and appropriate surveys to be undertaken. Great crested newts are a protected species and there are licensed proposals to deal with any found on or in the vicinity of the site. Illegal removal is dealt with</p>	

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			by the courts and will result in a significant fine or even imprisonment.	
IP354 – 72 (Old Boatyard) Cullingham Road	Main issue 5: Overlooking/ loss of privacy concerns	Stephen Morgan (Rep ID: 26234) Margaret Pearson (Rep ID: 26273)	Disagree for the following reason: This is a detailed matter that will be assessed as part of any future planning application through the design of any proposals.	
IP354 – 72 (Old Boatyard) Cullingham Road	Main issue 6: Flood Risk	Tim Leggett (Rep ID: 26258)	Noted - This is identified on the site sheet and the Strategic Flood Risk Assessment update does not rule out the site for development, provided that appropriate mitigation is provided.	
IP354 – 72 (Old Boatyard) Cullingham Road	Main issue 7: Piling/ damage to properties during construction.	Tim Leggett (Rep ID: 26258)	Disagree for the following reason: This is a detailed matter that will be assessed as part of any future planning application.	
IP354 – 72 (Old Boatyard) Cullingham Road	Main issue 8: No play area and large gardens needed for children to play.	Tim Leggett (Rep ID: 26258)	Disagree for the following reason: The layout of future development is a detailed matter that will be assessed as part of any future planning application. Proposals will need to conform to Policy DM6 (provision of new open spaces and recreation facilities) which has a preference for on-site provision.	

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IP354 – 72 (Old Boatyard) Cullingham Road	Main issue 9: May be a housing association development which is not in keeping with the ownership makeup of street.	Tim Leggett (Rep ID: 26258)	Disagree for the following reason: This is a detailed matter that will be considered as part of any future planning application. There is no policy which dictates the tenure makeup of future proposals (e.g. affordable rent, social rent, private ownership etc).	
IP354 – 72 (Old Boatyard) Cullingham Road	Main issue 10: Drainage/ sewage capacity concerns.	Margaret Pearson (Rep ID: 26273)	Disagree for the following reason: This is a detailed matter that will be assessed as part of any future planning application. The Strategic Flood Risk Assessment Update did not identify any insurmountable issues in terms of drainage from surface water flood risk. In addition, Anglian Water have not raised any objection to the allocation as part of the Local Plan Review consultation from a sewage capacity perspective.	
IP354 – 72 (Old Boatyard) Cullingham Road	Main issue 11: Archaeology wording on site sheet needs updating.	Suffolk County Council (Rep ID: 26612)	Agree for the following reason: IBC and SCC have agreed to modify the archaeology wording as per the draft SoCG.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_ibc_scc_infrastructure_socg.pdf</a>
IP355 – 77 – 79 Cullingham Road	Main issue 1: Support principle of allocation.	Universal Property Services Ltd (Rep ID: 26325)	Noted - no modification required.	
IP355 – 77 – 79 Cullingham Road	Main issue 2: Positive re-use of a brownfield site, within a predominantly residential area.	Universal Property Services Ltd (Rep ID: 26325)	Noted - no modification required.	

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IP355 – 77 – 79 Cullingham Road	Main issue 3: The site will allow for a comprehensive and controlled re-development of the area including geographically linked sites IP279a, b(1) and b(2) – Former British Telecom Office, Bibb Way and IP003 Waste Tip at Sir Alf Ramsey Way all within close proximity to IP355.	Universal Property Services Ltd (Rep ID: 26325)	Noted - no modification required.	
IP355 – 77 – 79 Cullingham Road	Main issue 4: The site will allow for cycle path aspirations linking the site to Bibb Way.	Universal Property Services Ltd (Rep ID: 26325)	Noted - no modification required.	
IP355 – 77 – 79 Cullingham Road	Main issue 5: 10m EA River corridor buffer zone will remove 50% of the site & render the site nonviable.	Universal Property Services Ltd (Rep ID: 26325)	Disagree for the following reason: The supporting text for Policy DM10 (Green Corridors) states that "Development taking place within this buffer zone will only be permitted if it can be clearly demonstrated that it would maintain or enhance the ecological quality of the river corridor." It is not therefore accurate to assume that this prohibits development completely, only that it must demonstrate enhancement or maintenance of the river corridors ecological quality.	
IP355 – 77 – 79 Cullingham Road	Main issue 6: Higher density will need to be considered to ensure viability and linked aspirations.	Universal Property Services Ltd (Rep ID: 26325)	Disagree for the following reasons: The density of 100dph is considered to be a robust means of estimating capacity given the site location and context. This is an indicative capacity and ultimately if it is considered that a higher density is feasible this will need to	

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			meet all the relevant policies of the Local Plan Review.	
IP355 – 77 – 79 Cullingham Road	Main issue 7: Archaeology wording on site sheet needs updating.	Suffolk County Council (Rep ID: 26615)	Agree for the following reason: IBC and SCC have agreed to modify the archaeology wording as per the draft SoCG.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_ibc_scc_infrastructure_socg.pdf</a>
ISPA4.1 – Northern End of Humber Doucy Lane	Main issue 1: Site should remain as farmland to provide the green trail (as per Policy DM10).	Derk Noske (Rep ID: 26194)	Disagree for the following reasons: The Council is required by the NPPF to identify land to meet its housing requirement. The land at Humber Doucy Lane was promoted for housing by the landowner through the adopted Ipswich Local Plan(2017) process. The Council resisted its allocation, as there was insufficient evidence about infrastructure impacts. The Inspector recommended as follows in his report of 17th January 2017 (Paragraph 37): "There is not currently the evidence to support the allocation of land at North East Ipswich for housing, or to identify it as an 'area of search' for residential development in preference to any other land in the Borough. However, there would be no reason in principle why residential development should not come forward on the land in accordance with modified policy DM34." Since 2017, the site has been considered on a cross-boundary basis with East Suffolk Council (e.g. through respective	

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			<p>Strategic Housing and Employment Land Availability Assessments) and included in transport modelling to understand potential impacts. The site incorporates the need for contribution towards the Council's green 'rim' (now green trail) which has potential to link through to the IGS country park. In addition, the site is subject to SANGS and is being jointly master planned by the two authorities to ensure impact of developing the site is mitigated and minimised.</p>	
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<p>ISPA4.1 – Northern End of Humber Doucy Lane</p>	<p>Main issue 2: Additional housing would encroach on this pristine countryside that provides easy access to green spaces.</p>	<p>Derk Noske (Rep ID: 26194)</p>	<p>Disagree for the following reasons: The Council is required by the NPPF to identify land to meet its housing requirement. The land at Humber Doucy Lane was promoted for housing by the landowner through the adopted Ipswich Local Plan(2017) process. The Council resisted its allocation, as there was insufficient evidence about infrastructure impacts. The Inspector recommended as follows in his report of 17th January 2017 (Paragraph 37): "There is not currently the evidence to support the allocation of land at North East Ipswich for housing, or to identify it as an 'area of search' for residential development in preference to any other land in the Borough. However, there would be no reason in principle why residential development should not come forward on the land in accordance with modified policy DM34." Since 2017, the site has been considered on a cross-boundary basis with East Suffolk Council (e.g. through respective Strategic Housing and Employment Land Availability Assessments) and included in transport modelling to understand potential impacts. The site incorporates the need for contribution towards the Council's green 'rim' (now the green trail) which has potential to link through to the IGS country park. In addition, the site is subject to SANGS and is being jointly master planned by the two</p>	
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			authorities to ensure impact of developing the site is mitigated and minimised.	
ISPA4.1 – Northern End of Humber Doucy Lane	Main issue 3: Allocation will significantly increase traffic and development should not take place until significant improvements to roads/ travel have been made.	Rushmere St Andrew Parish Council (Rep ID: 26233)	Agree in part: the cross-boundary allocations in IBC and East Suffolk are subject to master planning which will include addressing outstanding highway issues; phasing ; design etc. ISPA4 is included in the SoCG with SCC.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_-_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28 - _ibc_scc_infrastructure_socg.pdf</a>

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<p>ISPA4.1 – Northern End of Humber Doucy Lane</p>	<p>Main issue 4: The Rugby Football Club has a need to expand its facilities/ pitches to meet local demand. The potential sale of the existing land could realise the funding to assist the club to meet these demands either through an expansion adjacent to the existing site or an alternative new site. Site IP184b should be included within the ISPA4.1 allocation.</p>	<p>Ipswich Rugby Football Club (Rep ID: 26246)</p>	<p>Disagree for the following reason: The allocation of site IP184b would be inappropriate as part of this Local Plan Review. The land in question forms part of the Ipswich Rugby Football Club facilities, as well as the access to the larger parcel of the rugby land immediately to the north-east which is within the administrative boundary of East Suffolk Council. The adjoining land has not been allocated through the Suffolk Coastal Local Plan process. Allocating site IP184b would result in a lack of coordination between the two parcels of land and potentially compromise the ability for the rugby use to continue on the adjacent land due to the lack of access. The nearby cross-border allocation at Humber Doucy Lane (ISPA4.1) has been discussed, consulted upon and progressed through each stage of the Local Plan Review process, in alignment with East Suffolk Council. This is considered to be a more comprehensive and effective means of considering cross-border allocations rather than piecemeal allocations. In addition, there is a lack of detail and certainty at this stage regarding any potential replacement facilities for the Ipswich Rugby Football Club. In light of the above, Ipswich Borough Council considers that any potential development of this site and replacement facilities are instead planned comprehensively and collaboratively as part of a future Local Plan or Review.</p>	
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ISPA4.1 – Northern End of Humber Doucy Lane	Main issue 5: Development must preserve and where possible enhance nearby heritage assets and their settings where this setting contributes to significance. Heritage Impact Assessment required. Any specific measures required to remove/ mitigate any harm should be included in a site-specific policy for ISPA4.1.	Historic England (Rep ID: 26659)	Agree for the following reasons: This is a statutory duty. IBC has commissioned a Heritage Impact Assessment for the ISPA4.1 allocation to ensure that the Council complies with this duty. Findings will be considered when received and inform the master planning process.	
ISPA4.1 – Northern End of Humber Doucy Lane	Main issue 6: Archaeology wording on site sheet needs updating.	Suffolk County Council (Rep ID: 26616)	Agreed: archaeology is included in the Infrastructure SoCG with SCC.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_ibc_scc_infrastructure_socg.pdf</a>

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<p>ISPA4.1 – Northern End of Humber Doucy Lane</p>	<p>Main issue 7: Development of ISPA 4.1 is unsustainable. Concerns include traffic, school capacity, loss of habitat, air pollution and drainage infrastructure.</p>	<p>Jo Porter (Rep ID: 26432)</p>	<p>Disagree for the following reasons: The cross-boundary allocations in IBC and East Suffolk are subject to master planning which will include addressing outstanding highway issues; phasing; design etc. ISPA4 is included in the SoCG with SCC. Biodiversity will need to be preserved and must incorporate net gain. The Ipswich Wildlife Audit 2019 provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless other means of biodiversity enhancement are appropriate. There are rows of Tree Preservation Orders (TPOs) along the boundary with Westerfield House that will need to be preserved unless there are overriding reasons for their removal. Where possible existing hedges onto Humber Doucy Lane shall be preserved and protected during the development process as applicable. The layout and design of any future development must incorporate the provision of a Green Trail walking and cycling route to help deliver the wider Green Trail around Ipswich. The provision of Suitable Alternative Natural Green Space and other forms of open space will be required in accordance with the Open Space Standards set out in Appendix 5 of the Core Strategy and Development Management Policies DPD. However, the site is planned in the housing trajectory to come forward in the</p>
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			back end of the plan period and prior to this will be the subject of joint master planning. It is at this stage that such things can be considered in detail.	
ISPA4.1 – Northern End of Humber Doucy Lane	Main issue 8: Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), with suggested alternative allocation of land west of Tuddenham Road, north of Millenium Cemetery (capacity for 500 dwellings).	Ipswich School (Rep ID: 26635)	Disagree for the following reasons: the proposed allocation the objector promotes is needed to provide replacement sports facilities for the existing sports facilities land allocated for housing and associated infrastructure at IGS (policy CS10) and therefore the sports allocation needs to be retained.	

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IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)	Main issue 1: Object to the proposed allocation.	Ravenswood Residents Association (Rep ID: 26173) Ravenswood Environmental Group (Rep ID: 26334)	Noted - issues raised in detail dealt with elsewhere.	
IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)	Main issue 2: A mix of private and affordable homes are needed.	Ravenswood Residents Association (Rep ID: 26173) Ravenswood Environmental Group (Rep ID: 26334)	Noted: Policy CS8 sets out the requirements for housing mix.	
IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)	Main issue 3: Insufficient traffic capacity to cope with existing traffic demands. Additional development would exacerbate this.	Ravenswood Residents Association (Rep ID: 26173)	Disagree for the following reasons: SCC has been tasked with identifying strategic highway options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood. SCC will address any short term highway issues too.	
IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)	Main issue 4: Insufficient local services/ amenities capacity (doctors, dentists and school).	Ravenswood Residents Association (Rep ID: 26173)	Disagree for the following reasons: All new development has to ensure that it provides for the impact of potential residents on the capacity of existing community services and infrastructure.	

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IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)	Main issue 5: Does “Highway Network” just refer to the Nacton road/ Thrasher Roundabout or does it cover all roads?	Ravenswood Residents Association (Rep ID: 26173)	Disagree for the following reasons: SCC has been tasked with identifying strategic highway options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood. SCC will address any short term highway issues too.	
IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)	Main issue 6: A second access road into Ravenswood for the whole of Ravenswood, not just the new sites, is needed. This could potentially come from the existing private road to the south.	Ravenswood Residents Association (Rep ID: 26173)	Disagree for the following reasons: SCC has been tasked with identifying strategic highway options for the longer term development of Ravenswood. This can be achieved because of the significant land ownership of IBC in the locality of Ravenswood. SCC will address any short term highway issues too.	
IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)	Main issue 7: The site is incorrectly titled S & T but should be U, V and W.	Ravenswood Environmental Group (Rep ID: 26334)	Agree: This is a minor modification to table 3b of appendix 3 that is required.	<a href="#">See Minor Changes Reg 19 to Reg 22</a>
IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)	Main issue 8: The historic permission is no longer extant.	Ravenswood Environmental Group (Rep ID: 26334)	The site forms part of IP150a in the adopted Local Plan as referenced in the Site Allocations DPD (2017). 07/00765/OUT & 08/00246/REM have been permitted for part of outline site . As ‘Ravenswood T’ has been delivered, the emerging Local Plan has proposed to amend this allocation to only refer to Ravenswood U, V and W.	

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<p>IP206 – Cranfields, College Street</p>	<p>Main issue 1: Support identification of IP206 within Policy SP3, however, believe that the capacity figures are conservative and should be increased by up to 50%, with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035).</p>	<p>Cardinal Lofts (Mill) Ltd) (Rep ID: 26578)</p>	<p>Disagree for the following reasons: - Note the support for the identification of the site in policy SP3. The capacity for IP206 is based on the latest available planning permission evidence. This is considered a deliverable and more accurate estimation of capacity and should not be increased. It is not considered that there is a need for reference to parking need on adjacent sites such as IP035. The Council has prepared a Parking Strategy which does not include this land specifically for parking.</p>	
<p>IP211 – Regatta Quay</p>	<p>Main issue 1: Support identification of IP211 within Policy SP3, however, believe that the capacity figures are conservative and should be increased by up to 50%, with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035).</p>	<p>Cardinal Lofts (Mill) Ltd) (Rep ID: 26580)</p>	<p>Disagree for the following reasons: Note the support for the identification of the site in policy SP3. The capacity for IP211 is based on the latest available planning permission evidence. This is considered a deliverable and more accurate estimation of capacity and should not be increased. It is not considered that there is a need for reference to parking need on adjacent sites such as IP035. The Council has prepared a Parking Strategy which does not include this land specifically for parking.</p>	

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IP279a – Former British Telecom, Bibb Way	Main issue 1: Whilst no objection to conversion of BT building into residential units, concerns raised over impact on local wildlife. Concerns also raised over whether development would include areas of nature reserve/canal adjacent to the building.	Philip Charles (Rep ID: 26349)	Noted - no modification required: The site sheet notes that the site is located adjacent to a County Wildlife Site and Local Nature Reserve and suggests that the site may have wildlife interest meaning an ecological and reptile survey will be required before any work can start. It also notes that development of the site 'should ensure that the Alderman Canal corridor and its associated habitats are buffered and enhanced' and as such 'any future green space should be sited adjacent to the canal.' Therefore, sensitive wildlife areas adjacent to the site will be protected.	
IP028b – Jewsons, Greyfriars Road	Main issue 1: Archaeology wording on site sheet needs updating.	Suffolk County Council (Rep ID: 26604)	Agree - This has been agreed through the draft Statement of Common Ground between IBC and SCC.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_ibc_scc_infrastructure_socg.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a28_ibc_scc_infrastructure_socg.pdf</a>
IP226 – Helena Road/ Patteson Road	Main issue 1: Concerned about impact of building a new block of apartments in close proximity as area already well built up.	Lily Maksimovic (Rep ID: 26271)	Noted - no modification required: The site sheet suggests that 'development should address Helena Road which faces towards the waterfront with an interesting, eye catching design which contributes positively to the Wet Dock Conservation Area' and notes that 'western side of the allocation site could accommodate taller development, whilst stepping down to a more domestic scale eastwards.' Therefore, the scale and appearance of the building will be carefully designed to respond to the surrounding area. The site is also located within the Holywells Opportunity Area H. The development	

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			principles suggest that the scale of development here will generally medium-rise (3-5 storeys) with taller buildings only being located in key locations.	
IP226 – Helena Road/ Patteson Road	Main issue 2: Parking is difficult around here.	Lily Maksimovic (Rep ID: 26271)	Noted - no modification required: The site is located within the Holywells Opportunity Area H which highlights the opportunity for the improvement of pedestrian and cycle links in the area which would reduce the need for car use. Additionally, Policy DM21 of the Core Strategy states that development should 'prioritise available options to enable and support travel on foot, by bicycle or public transport' and if car parking is still required at a new development, Policy DM22 states that the Council 'will expect parking to be fully integrated into the design of the scheme to provide secure and convenient facilities and create a safe and attractive environment.'	
IP226 – Helena Road/ Patteson Road	Main issue 3: Concerned about impact on amenity of nearby properties.	Lily Maksimovic (Rep ID: 26271)	Noted - no modification required: Policy DM18 of the Core Strategy states that the Council 'will protect the quality of life of occupiers and neighbours by only granting permission for development that does not result in an unacceptable loss of amenity.'	

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Sustainability Appraisal/ Strategic Environmental Assessment	Main issue 1: The methodology and baseline information meet the requirements of the SEA Directive and associated guidance. The final SA contains a robust assessment of the environmental effects of plan policies and allocations on statutorily designated sites and landscapes and has taken into account advice and the findings of the HRA.	Natural England (Francesca Shapland) (Rep ID: 26288)	Noted - no modification required.	
Sustainability Appraisal/ Strategic Environmental Assessment	Main issue 2: Appears that environmental, social and economic effects of plan(s) are inadequately/ inaccurately assessed against HRA and the SA. The SEA Directive requires that assessment include identification of cumulative and synergistic effects, including other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion.	Save Our Country Spaces (Rep ID: 26341)	Disagree for the following reason: - The assessment of the effects of the Local Plan Review are considered to be adequate and accurate when assessed against the HRA and SA. The SA does include identification of the cumulative and synergistic effects of neighbouring authorities Local Plans. This is demonstrated in section 3.16 (page 46) of the document.	

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<p>Sustainability Appraisal/ Strategic Environmental Assessment</p>	<p>Main issue 3: Highly material is the decision/judgement released from The Supreme Court on Climate Change and development- (Heathrow)1. This needs referencing and being taken into account within Local Plans as it is a 'fundamental game changer' with respect to Local Plans, Strategic Planning and Local Development Control and Planning Committee decision making. This new case law could make Local Plans, where Paris Agreement on climate change, (concluded in December 2015 and ratified by the United Kingdom in November 2016) isn't adequately taken into account or doesn't demonstrate conformity to within Strategic Environmental Assessment challengeable and potentially unlawful.</p>	<p>Save Our Country Spaces (Rep ID: 26345)</p>	<p>Disagree for the following reason: - The Heathrow Judgement is only material to national policy decisions such as NPSs and not local plans.</p>	
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<p>Sustainability Appraisal/ Strategic Environmental Assessment</p>	<p>Main issue 4: SA simply assumes that CS fully implemented and full funding for all measures secured. No evidence that IBC can deliver improvements in walking, cycling and bus infrastructure, improved road infrastructure and unprecedented levels of modal shift. IBC and SCC's record in these areas is dire. SA incomplete and underplays key issues. Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.</p>	<p>Save Our Country Spaces (Rep ID: 26373) Northern Fringe Protection Group (Rep ID: 26501 &amp; 26504)</p>	<p>Disagree for the following reasons: The purpose of the SA is to identify the social, economic and environmental effects of a plan and is done so on the basis that the plan and all its measures presented are implemented. It is not meant to second guess what measures will/ will not be implemented due to funding. IBC, SCC and other infrastructure providers are continuing to engage through draft and final Statements of Common Ground to evidence the delivery of measures. The SA is considered to be complete and provides a robust assessment of all relevant factors. The green-rim (now the green trail) has not been re-designated, just re-named for clarity. Its purpose remains the same. The SA considered a range of different growth strategies and using alternatives to the strategy proposed (which includes Humber Doucy Lane) but these performed poorer in terms of the SA scoring. The Suffolk Coastal Local Plan equivalent Humber Doucy Lane has not been proposed to be removed in the main modifications consultation notwithstanding the lower housing target.</p>	
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<p>Sustainability Appraisal/ Strategic Environmental Assessment</p>	<p>Main issue 5: The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756). Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) it had included in its final draft plan10 (paragraph 12.209). The SA fails to assess this and is unsound.</p>	<p>Save Our Country Spaces (Rep ID: 26377)</p>	<p>Disagree for the following reason: - The adjoining land within the administrative boundary of East Suffolk Council has been retained in the Suffolk Coastal Local Plan as demonstrated in their Main Modifications consultation. The lowering of the housing target is due to the use of the 2014 rather than 2016 based household projections has not resulted in this site being removed in the proposed main modifications.</p>	
<p>Sustainability Appraisal/ Strategic Environmental Assessment</p>	<p>Main issue 6: The proposal to allow development in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road is not justified and therefore unsound. Land in the centre of Ipswich earmarked for expanded retail and car parking (which we believe is surplus to requirements), should be used for new homes instead. There is no SA of this viable alternative.</p>	<p>Save Our Country Spaces (Rep ID: 26378) Northern Fringe Protection Group (Rep ID: 26505)</p>	<p>Disagree for the following reasons: The NPPF requires plan making authorities to look ahead over at least the next 10 years in evaluating retail needs. The updated requirement of 10,000sqm net is based on the most up to date evidence base and is considered to be robust. Re-allocating the identified retail allocations to housing would compromise the ability to deliver this. The car parking that has been allocated aligns with the Parking Strategy option that has been agreed and this only equates to a net increase of 3 spaces to 2036 and is not surplus to requirements. It is agreed that town centre housing is preferential from a sustainable development perspective. This is reflected in the Council's preferred Spatial Option and Strategy for growth in the Sustainability Appraisal. The Sustainability Appraisal did also</p>	

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		<p>assess changing the use of existing land in the Borough to housing as a spatial option in of itself. However, this was rejected because it performed poorer than the preferred spatial option in terms of impacts on poverty and exclusion, air quality, town centres, transport and movement etc. The Council has exhausted the deliverable sites within the town centre and therefore the Humber Doucy Lane (ISPA4.1) is required to help meet the identified objectively assessed housing need.</p>	
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<p>Sustainability Appraisal/ Strategic Environmental Assessment</p>	<p>Main issue 7: No SA of:</p> <ul style="list-style-type: none"> <li>- Lack of sewage infrastructure for IGS and ISPA and environmental impacts of new sewage infrastructure (emissions and traffic congestion)</li> <li>- air quality or noise assessment in relation to rail transport most (Ipswich Chord and Freight yard) and additional freight to/ from Port of Felixstowe,</li> <li>- environmental impacts of Port of Ipswich.</li> <li>- potential impacts of increased freight traffic on IGS pedestrian bridge and Westerfield rail crossing</li> <li>-decision to destroy Green Rim by building homes on ISPA4 and re-designating as Green Trails.</li> <li>- lack of full appraisal of the impacts on building ISPA4.</li> <li>- omission Climate Emergency Declaration.</li> </ul>	<p>Save Our Country Spaces (Rep ID: 26485)</p>	<p>Disagree for the following reasons: The details for sewage infrastructure specifically for IGS and Humber Doucy Lane (ISPA4.1) will only be known once reserved matters for any proposals are submitted and subject to consultation with infrastructure providers at this stage. The Council has engaged with Anglian Water through the joint Water Cycle Study and at each stage of plan making and no objections have been raised in relation to infrastructure requirements for these sites. These rail projects are not required infrastructure projects as part of the Local Plan Review and it would not be reasonable to assess any increases to rail transport that may or may not occur. This will be the matter of the rail provider at the appropriate juncture in any new proposals. The Local Plan Review does not propose any projects that result in an increase in the intensity of port-related activities at the Port of Ipswich or an expansion to the port itself. This is not a required part of the Local Plan Review. Any increase in port-related activities and/or expansion that has not been identified will be the subject of the relevant regulations/ legislation that assesses any impacts, outside this Local Plan Review process. The impact on freight traffic on IGS will be the subject of consultation and detail at the reserved matters stages of applications. The Green Rim is not being 'destroyed' as this does not</p>
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			<p>accord with the purpose of the Green Rim (now Green Trail). As the purpose is identical it does not require a re-assessment. The impact of development at ISPA4.1 has been assessed in the SA. The vision and objectives of the Local Plan Review align with the climate emergency declaration.</p>	
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<p>Sustainability Appraisal/ Strategic Environmental Assessment</p>	<p>Main issue 8: Appendix F sets out our full concerns. In summary, the SA has not considered the spatial strategy actually set out in the Local Plan. An option has been assessed which the Council consider to be close to the spatial strategy chosen, but they are different. It appears that Spatial Option 1, the option most closely aligned with the spatial strategy in the Local Plan, has been scored unjustly positively in some areas, and Spatial Option 2 has been scored more poorly. The SA prepared alongside the emerging Local Plan does not provide the necessary justification of the proposed spatial strategy. SA needs updating to address these concerns.</p>	<p>Bloor Homes (Strutt and Parker) (Rep ID: 26591)</p>	<p>Disagree for the following reason: - The SA provides a robust assessment of Spatial Option 1 (higher density urban regeneration). The scoring of this is considered to be justified. It is acknowledged that the scoring of the SA is a subjective matter and is ultimately up to the decision maker to apply their planning judgement. The Council's approach follows this spatial option 1 closely but ultimately to achieve the objectively assessed housing need within the boundary of the Borough must consider some sites (e.g. Humber Doucy Lane and Ravenswood) that are not in complete alignment with this spatial option. However, it is relevant to note that these sites and policies have been fully assessed and are considered to perform well when assessed against the SA objectives. The justification for the scoring of Spatial Option 2 is considered sound.</p>	
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<p>Habitat Regulations Assessment</p>	<p>Main issue 1: The HRA provides a robust assessment of the Ipswich Local Plan final draft in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). Recommendations for strengthening the policy wording of the HRA have been incorporated within the final draft of the Core Strategy and carried forward into the Appropriate Assessment stage.</p>	<p>Natural England (Francesca Shapland) (Rep ID: 26287)</p>	<p>Noted - no modification required.</p>	
<p>Habitat Regulations Assessment</p>	<p>Main issue 2: Heathrow decision highly material. Needs referencing and assessment regarding Local Plans, Strategic Planning and Local decision making. New case law could make Local Plans, where Paris Agreement on climate change isn't adequately taken into account or doesn't demonstrate conformity to within HRA challengeable and potentially unlawful.</p>	<p>Save Our Country Spaces (Rep ID: 26346)</p>	<p>Disagree for the following reason: - The Heathrow Judgement is only material to national policy decisions such as NPSs and not local plans.</p>	

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<p>Habitat Regulations Assessment</p>	<p>Main issue 3: Fails to take into account non-compliance of the AQAP with Government guidelines, non-compliance of the AQA for the IGS with DM3 and train and shipping emissions, especially as shipping will clearly impact on the Orwell Estuary, which is part of a Special Protection Area (SPA) and Ramsar site.</p>	<p>Save Our Country Spaces (Rep ID: 26346) Northern Fringe Protection Group (Rep ID: 26503)</p>	<p>Disagree for the following reason: The HRA has been prepared in conjunction with Natural England and in accordance with the Conservation of Habitats and Species Regulations 2017, as amended and all aspects of the emerging local plan that influence sustainable development have been checked through the assessment for risk to European sites.</p>	
<p>Habitat Regulations Assessment</p>	<p>Main issue 4: HRA simply assumes that CS fully implemented and full funding for all measures secured. No evidence that IBC can deliver improvements in walking, cycling and bus infrastructure, improved road infrastructure and unprecedented levels of modal shift. IBC and SCC's record in these areas is dire. HRA incomplete and underplays key issues. Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.</p>	<p>Save Our Country Spaces (Rep ID: 26376) Northern Fringe Protection Group (Rep ID: 26503)</p>	<p>Disagree for the following reason: The HRA has been prepared in conjunction with Natural England and in accordance with the Conservation of Habitats and Species Regulations 2017, as amended and all aspects of the emerging local plan that influence sustainable development have been checked through the assessment for risk to European sites. The transport infrastructure needed is identified through table 8A of the Core Strategy which recognises that a range of measures from sustainable transport measures to A1214 improvements will be needing to meet the transport challenges posed by planned growth. The County Council's Transport Mitigation Strategy is designed to address modal shift through the implementation of measures identified through this ISPA work. An action group has been formed to develop funding mechanisms in the proportional way in order to reduce the impact of traffic on Ipswich. The purpose of</p>	

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		<p>the green trail remains the same as the green rim as described in the adopted Local Plan. The reason for the name change was because it was brought to the attention of officers that the name "green rim" may falsely give the impression that this land is a de-facto green belt and purely restrictive in purpose. The green rim was established as a green infrastructure concept as an ecological and recreational/ accessible corridor and was designated as such to ensure that any development incorporates sufficient links to this corridor. The term "green trail" was considered to be a more accurate name which encompasses both the biodiversity and active travel functions.</p>	
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<p>Habitat Regulations Assessment</p>	<p>Main issue 5: HRA incomplete and must address impacts of:</p> <ol style="list-style-type: none"> <li>1. Proposed re-designation of Green Rim.</li> <li>2. New sewage infrastructure required for growth.</li> <li>3. Required traffic infrastructure identified by traffic modelling</li> <li>4. Non-compliance of IGS AQA with DM3.</li> <li>5. Emissions from rail and shipping.</li> </ol> <p>If no such assessments are included in the HRA then needs to explain why. IBC's response to the recommendations in relation to Paragraph 1.29 is not acceptable. CS needs strengthening to ensure compliance with this recommendation especially given Green Rim redesignation. Also whether lack of S106 payments for RAMs IGS sites acceptable.</p>	<p>Save Our Country Spaces (Rep ID: 26491) Northern Fringe Protection Group (Rep ID: 26539)</p>	<p>Disagree, for reasons stated above and all new development is expected through the development management system to meet the impact of potential residents on existing transport and social infrastructure.</p>	
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<p>Health Impact Assessment</p>	<p>Main issue 1: Assumes that CS fully implemented and full funding for all measures. No evidence delivery of improvements in walking, cycling and bus infrastructure, improved road infrastructure and unprecedented levels of modal shift. IBC and SCC's record regarding this is dire. HIA incomplete and underplays key issues. Needs to fully assess air quality impacts including from rail/ sea, additional road infrastructure required, re-designation of Green Rim, climate change declaration, alternatives to HDL (and SCDC no longer needs this to meet housing target), flood risk and new sewage infrastructure. Needs to assess robustness if unprecedented levels of modal shift underachieved.</p>	<p>Save Our Country Spaces (Rep ID: 26374) Northern Fringe Protection Group (Rep ID: 26502)</p>	<p>Disagree for the following reason: The transport infrastructure needed is identified through table 8A of the Core Strategy which recognises that a range of measures from sustainable transport measures to A1214 improvements will be needed to meet the transport challenges posed by planned growth.</p>	
<p>Local Plan Policies Map</p>	<p>Main issue 1: The key is out of date. County Geological Sites and Regionally Important Geological Sites are all called "County Geological Sites" now. The five locations of the sites are correct, only the key is wrong.</p>	<p>GeoSuffolk (Caroline Markham) (Rep ID: 26243)</p>	<p>Disagree for the following reasons: GeoConservation UK website says "NOTE: The term Regionally Important Geological/geomorphological Sites (RIGS) has been in usage now for many years and is still used to describe Local Geological/geodiversity Sites and should be regarded as synonymous."</p>	

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Local Plan Policies Map	Main issue 2: With regard to land use designations within the IGS, there is a lack of clarity/consistency to terminology, and in any event there is no need for specific land use allocations within the overall IGS, or justification for the specific areas shown. Removal of land use allocations within the overall IGS allocation, or at least adjustment to the key/text to make clear that all are indicative.	Mersea Homes (Phase 2 Planning and Development Ltd) (Rep ID: 26305)	Disagree for the following reasons: It is important to indicate on the policies map allocations and infrastructure associated with IGS in accordance with the IGS Development SPD.	
Local Plan Policies Map	Main issue 3: Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as "Land Allocated for Sport Use" as it is not required for this purpose. It is proposed the site is allocated for 500 dwellings.	Ipswich School (Rep ID: 26638)	Disagree for the following reasons: The proposed allocation the objector promotes is needed to provide replacement sports facilities for the existing sports facilities land allocated for housing and associated infrastructure at IGS (policy CS10) and therefore the sports allocation needs to be retained.	

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<p>IP-One Policies Map</p>	<p>Main issue 1: Object to inclusion on the IP – One Inset Map of a route for the Wet Dock Crossing. Whilst supportive of intention to continue to make a case for Wet Dock Crossing, given there is no formal commitment to this it is not appropriate for Policies Map IP – One Area Inset to define an alignment of a potential route for a Wet Dock Crossing and for SP9 to effectively safeguard this. Request amendments.</p>	<p>Associated British Ports (Rep ID: 26492)</p>	<p>Disagree for the following reasons: The development of the site is designed not to prejudice the wet dock crossing and indeed following the decision not to pursue the three Bridges scheme SCC has reserved up to £10.8m to help secure it or something similar. It is important to have a vehicular access to the site to accommodate emergency vehicles should they ever be required and to ensure a link between the island site and the west bank.</p>	
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IP-One Policies Map	Main issue 2: Regarding the delineation of the opportunity areas, it is unclear which boundaries the Council is promoting through this Plan, and which areas are covered by Policies SP11, SP12, and SP13. The Policies Map IP-One Area inset map and Chapter 6 of the Plan shows detailed boundaries for eight opportunity areas. However, these areas do not match up with illustrative boundaries in The Ipswich Key Diagram. The opportunity areas need to be clearly defined and labelled on the policies map, so that it is clear which policy and supporting text relates to which area, and the extent of the land in question.	Historic England (Rep ID: 26662)	Noted - This is being resolved through the SoCG emerging with Historic England.	<a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a27-draft_statement_of_common_ground_he_0.pdf</a>
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**Plan 5 – Ipswich Ecological Network**

<b><u>Title/ Section</u></b>	<b><u>Submission Wording (Reg 22)</u></b>	<b><u>Requested Post-Submission Wording</u></b>	<b><u>Reason</u></b>
Map	Map is based on 2012/13 Wildlife Audit.	Map requires updating to reflect 2019 Wildlife Audit.	In response to Rep ID 26327 (Suffolk Wildlife Trust)

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**Minor changes Reg 19 to Reg 22**

The table below lists minor modifications requested (grammatical and formatting) to the Submission (Reg 22) version of the emerging Local Plan Review.

**Core Strategy DPD**

<b><u>Title/ Section</u></b>	<b><u>Submission Wording (Reg 22)</u></b>	<b><u>Requested Post-Submission Wording</u></b>	<b><u>Reason</u></b>
CHAPTER 1: Introduction  Paragraph 1.2	1.2 This document is the Core Strategy and Policies Development Plan Document for Ipswich. It forms part of the Ipswich Local Plan. It covers three areas of policy. <ul style="list-style-type: none"> <li>• Firstly it sets out a strategic vision and objectives to guide the development of the town (Chapter 6);</li> <li>• Secondly it promotes the spatial strategy for the development of the town to 2036 through strategic policies within the context of the Ipswich Strategic Planning Area (Chapter 8); and</li> <li>• Thirdly, it provides a suite of policies to control, manage and guide</li> </ul>	1.2 This document is the Core Strategy and Policies Development Plan Document for Ipswich. It forms part of the Ipswich Local Plan. It covers three areas of policy. <ul style="list-style-type: none"> <li>• Firstly, it sets out a strategic vision and objectives to guide the development of the town (Chapter 6);</li> <li>• Secondly, it promotes the spatial strategy for the development of the town to 2036 through strategic policies within the context of the Ipswich Strategic Planning Area (Chapter 8); and</li> <li>• Thirdly, it provides a suite of policies to control, manage and guide</li> </ul>	Add comma in after ‘Firstly’ and ‘Secondly’ to improve grammar

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<b><u>Title/ Section</u></b>	<b><u>Submission Wording (Reg 22)</u></b>	<b><u>Requested Post-Submission Wording</u></b>	<b><u>Reason</u></b>
	development across the Borough (Chapter 9).	development across the Borough (Chapter 9).	
CHAPTER 1: Introduction  Paragraph 1.3	1.3. It also includes two non-policy based areas. Firstly a section on the context to the whole document which explains, amongst other things, the planning system (Chapter 2), the New Anglia Local Enterprise Partnership (Chapter 3), the Duty to Co-operate (Chapter 4), and an explanation as to how all Ipswich's planning documents fit together (Chapter 1).	1.3. It also includes two non-policy based areas. Firstly, a section on the context to the whole document which explains, amongst other things, the planning system (Chapter 2), the New Anglia Local Enterprise Partnership (Chapter 3), the Duty to Co-operate (Chapter 4), and an explanation as to how all Ipswich's planning documents fit together (Chapter 1).	Add comma in after ‘Firstly’ to improve grammar
CHAPTER 1: Introduction  Paragraph 1.6	1.6. The final draft local plan is written in two main parts. The first part ‘Core Strategy and Policies Development Plan Document’ sets out the vision of the future for Ipswich to 2036 and contains a set of general policies which will help to achieve this vision.	1.6. The final draft <u>L</u> ocal <u>P</u> lan is written in two main parts. The first part, ‘Core Strategy and Policies Development Plan Document’, sets out the vision of the future for Ipswich to 2036 and contains a set of general policies which will help to achieve this vision.	‘Local Plan’ capitalised for consistency  Add in commas to improve grammar
CHAPTER 1: Introduction  Paragraph 1.6	The second document the ‘Site Allocations and Policies (incorporating IP One Action Plan) Development Plan Document’ identifies a range of sites	The second document, the ‘Site Allocations and Policies (incorporating IP One Action Plan) Development Plan Document’, identifies a range of sites	Add in commas to improve grammar

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
	for different uses across the whole Borough that are allocated for development.	for different uses across the whole Borough that are allocated for development.	
CHAPTER 1: Introduction  Paragraph 1.12	1.12 As the local plan develops, it is subject to Sustainability Appraisal (including Strategic Environmental Assessment) and a Habitat Regulations Assessment.	1.12 As the local plan develops, it is subject to Sustainability Appraisal (including Strategic Environmental Assessment) and a Habitats Regulations Assessment.	Change from Habitat Regulations Assessment to Habitats Regulations Assessment
CHAPTER 1: Introduction  Paragraph 1.12	To support the Final Draft Plan, the Council have undertaken a Habitats Regulation Assessment to inform the policies and site allocations within it.	To support the Final Draft Plan, the Council have undertaken a Habitats Regulations Assessment to inform the policies and site allocations within it.	Change from Habitats Regulation Assessment to Habitats Regulations Assessment
CHAPTER 1: Introduction  Paragraph 1.12	This has been assessment has been published alongside the final draft local plan.	This <del>has been</del> assessment has been published alongside the final draft <u>Local Plan</u> .	Remove ‘has been’ so that sentence makes sense  ‘Local Plan’ capitalised for consistency
CHAPTER 1: Introduction  Paragraph 1.13	The Sustainable Appraisal Assessment of the final draft Local Plan is published alongside the plan.	The <del>Sustainable</del> <b>Sustainability</b> Appraisal Assessment of the final draft Local Plan is published alongside the plan.	Change ‘Sustainable’ to ‘Sustainability’

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
CHAPTER 1: Introduction  Paragraph 1.14	When this draft local plan is adopted, it will replace the 2017 Ipswich Local Plan as planning policy for Ipswich.	When this draft <u>Local Plan</u> is adopted, it will replace the 2017 <b>adopted</b> Ipswich Local Plan as planning policy for Ipswich.	'Local Plan' capitalised for consistency  Add 'Adopted' for clarity.
CHAPTER 1: Introduction  Diagram 1	Marine Management South East Marine Plan	<del>Draft Marine Management</del> South East Marine Plan <b>and the East Inshore and East Offshore Marine Plans.</b>	Correct terminology
CHAPTER 1: Introduction  Paragraph 1.17	1.17 The Council is required to keep the plan under review and this review updates the adopted plan of February 2017.	1.17 The Council is required to keep the plan under review and this review updates the adopted <del>plan</del> <b>Local Plan</b> of February 2017.	'Local Plan' capitalised for consistency
CHAPTER 2: The Planning System  Notes to diagram	The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document and policies map will highlight land that is the subject of designations that means it will be protected, and identify allocations of land for specific types of development.	The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document and policies map will highlight land that is the subject of designations that means it will be protected, and identify allocations of land for specific types of development.	Change full stop from red to black
Diagram 2: Ipswich Local	'Public Open Space SPD' box unattached to tree diagram	'Public Open Space SPD' box <u>attached to tree diagram</u>	Move 'Public Open Space SPD' box up/move line down so it is attached to the tree diagram

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Development Scheme			
CHAPTER 2: The Planning System  Paragraph 2.6	The sustainability appraisal is revisited at each stage of plan-making.	The <u>S</u> ustainability <u>A</u> ppraisal is revisited at each stage of plan-making.	‘Sustainability Appraisal’ capitalised for consistency
CHAPTER 2: The Planning System  Paragraph 2.10	Section 110 of the Localism Act sets out the Duty to Cooperate. The duty applies to all Local Planning Authorities, National Park Authorities and County Councils in England and to a number of other prescribed public bodies. The Duty to Co-operate requires these bodies to engage constructively, actively and on an ongoing basis in relation to strategic cross boundary planning issues. Local Planning Authorities have to demonstrate how they have met the requirements of the duty.	Section 110 of the Localism Act sets out the Duty to Cooperate. The duty applies to all <u>l</u> ocal <u>p</u> lanning <u>a</u> uthorities, National Park Authorities and County Councils in England and to a number of other prescribed public bodies. The Duty to Co-operate requires these bodies to engage constructively, actively and on an ongoing basis in relation to strategic cross boundary planning issues. Local <u>p</u> lanning <u>a</u> uthorities have to demonstrate how they have met the requirements of the duty.	Change ‘Local Planning Authorities’ to ‘local planning authorities’ - it is not capitalised in the rest of the document so change here for consistency
CHAPTER 2: The Planning System	The plan strategy has been developed as a result of reviewing the adopted plan strategy and the updated	The plan strategy has been developed as a result of reviewing the adopted plan strategy and the updated evidence	‘Sustainability Appraisal’ capitalised for consistency

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Paragraph 2.13	evidence base, and testing the emerging plan at each stage through the sustainability appraisal process.	base, and testing the emerging plan at each stage through the <u>S</u> ustainability <u>A</u> ppraisal process.	
CHAPTER 2: The Planning System  Paragraph 2.14	Ipswich Borough has a tightly drawn administrative boundary, which constrains the practical options for meeting needs for development, taking as the starting point the national policy requirement for the Borough should meet its own needs if possible.	Ipswich Borough has a tightly drawn administrative boundary, which constrains the practical options for meeting needs for development, taking as the starting point the national policy requirement for the Borough <del>should</del> <u>to</u> meet its own needs if possible.	Change ‘should’ to ‘to’ to improve grammar
CHAPTER 4: The Duty to Co-Operate  Paragraph 4.5	Policies ISPA 1 – 4 of the Core Strategy Review sets out the Council’s policy approach to the Ipswich Strategic Planning Area.	Policies ISPA 1 – 4 of the Core Strategy Review sets out the Council’s policy approach to the Ipswich Strategic Planning Area.	Change ‘sets’ to ‘set’ to improve grammar
CHAPTER 5: Ipswich – the Place  Paragraph 5.4	Deprivation issues are the result of different combinations of factors that may include higher than average proportions of elderly residents, high unemployment; lower-than average skill level; income deprivation or crime.	Deprivation issues are the result of different combinations of factors that may include higher than average proportions of elderly residents, high unemployment, lower-than average skill level, income deprivation or crime.	Change ; to , for consistency within the sentence

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
CHAPTER 5: Ipswich – the Place  Paragraph 5.11	Today it is the location for the largest single regeneration project in the East of England and the focus of huge commercial, cultural and institutional investment such as the regional home for Dance East and the University of Suffolk.	Today it is the location for the largest single regeneration project in the East of England and the focus of huge commercial, cultural and institutional investment such as the regional home for Dance East and the University of <u>Suffolk</u> .	Remover underscore between ‘of’ and ‘Suffolk’
CHAPTER 5: Ipswich – the Place  Paragraph 5.22	All of these features are important to the character of Ipswich and as conservation areas are also major protected heritage assets. They in effect confine traffic to only three 'crossing - points': Colchester Road north of the park; Crown Street north of the core; and Star Lane - College St/Key Street north of the dock.	All of these features are important to the character of Ipswich and, as conservation areas, are also major protected heritage assets. They, in effect, confine traffic to only three 'crossing - points': Colchester Road north of the park; Crown Street north of the core; and Star Lane - College <u>Street</u> / Key Street north of the dock.	Add commas to improve grammar. Change ‘st’ to ‘street’.
CHAPTER 5: Ipswich – the Place  Paragraph 5.26 – Table 2 - Population	<ul style="list-style-type: none"> <li>Ipswich scores worse than the Suffolk average against every indicator the ‘Index of Multiple Deprivation Score’ except, barriers to housing and services.</li> </ul>	<ul style="list-style-type: none"> <li>Ipswich scores worse than the Suffolk average against every indicator <u>of</u> the ‘Index of Multiple Deprivation Score’, except, barriers to housing and services.</li> </ul>	Add ‘of’ and change position of comma to improve grammar

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
CHAPTER 5: Ipswich – the Place  Paragraph 5.26 – Table 2 - Population	<ul style="list-style-type: none"> <li>The Borough, compared to the rest of the county has a higher number of children, a higher population of working age because of the availability of job opportunities.</li> </ul>	<ul style="list-style-type: none"> <li>The Borough, compared to the rest of the county, has a higher number of children <b>and</b> a higher population of working age because of the availability of job opportunities.</li> </ul>	Add 'and' and change position of comma to improve grammar
CHAPTER 6: Vision and Objectives  Paragraph 6.6	With regard to the Objectives there is a clear inter-relationship between them and many of the policies in Chapter 8 of this document.	With regard to the Objectives, there is a clear inter-relationship between them and many of the policies in Chapter 8 of this document.	Add comma to improve grammar
CHAPTER 6: Vision and Objectives  Paragraph 6.8 – Objective 10	To retain and provide high quality and sustainable education, health and sports facilities and other key element of community infrastructure to meet local demand.	To retain and provide high quality and sustainable education, health and sports facilities and other key elements of community infrastructure to meet local demand.	Change 'element' to 'elements' to improve grammar
CHAPTER 6: Vision and Objectives  Paragraph 6.10	<ul style="list-style-type: none"> <li>it enhances the vitality and vibrancy of the central area, reinforcing its role as a county town and regional centre; and</li> <li>it addresses social needs by tackling issues of social and economic deprivation.</li> </ul>	<ul style="list-style-type: none"> <li>it enhances the vitality and vibrancy of the central area, reinforcing its role as a county town and regional centre; <del>and</del></li> <li>it addresses social needs by tackling issues of social and economic deprivation-; <b>and</b></li> </ul>	<p>Move ' ; and' down a bullet point and add full stop at end of list.</p> <p>Change 'It' to 'it' for consistency with other bullet points</p>

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	<ul style="list-style-type: none"> <li>It recognises the need for lower density family housing</li> </ul>	<ul style="list-style-type: none"> <li><u>it</u> recognises the need for lower density family housing.</li> </ul>	
CHAPTER 6: Vision and Objectives  Paragraph 6.12	There are already in existence examples of such joint working, through initiatives such as ActivLives.	There are already <del>in existence</del> examples of such joint working <b>in existence</b> , through initiatives such as ActivLives.	Move position of ‘in existence’ to improve sentence flow
CHAPTER 6: Vision and Objectives  Paragraph 6.13	In exceptional circumstances 'more vulnerable' development, such as housing or education development in Flood Zones: 2 and 3 may be possible if ‘within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and development is appropriately flood resilient and resistant, including safe refuge, access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems’2 (the Exception Test).	In exceptional circumstances 'more vulnerable' development, such as housing or education development in Flood Zones: 2 and 3 may be possible if ‘within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and development is appropriately flood resilient and resistant, including safe refuge, access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems’2 (the Exception Test).	Remove ‘:’ to improve grammar and sentence flow

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
CHAPTER 6: Vision and Objectives  Paragraph 6.15	There is in place an agreed Ipswich Flood Defence Management Strategy and work to replace and raise the height of the floodgates in the Wet Dock lock is now complete.	There is <del>in place</del> an agreed Ipswich Flood Defence Management Strategy <b>in place</b> and work to replace and raise the height of the floodgates in the Wet Dock lock is now complete.	Move position of 'in place' to improve sentence flow
CHAPTER 6: Vision and Objectives  Paragraph 6.17	This arises from the Kesgrave Covenant (Rep ID: 26438) Representation...	6.17 Thus, a significant number of Ipswich's new homes will be provided within central Ipswich through sites that will be identified in the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document. As a secondary source of sites, land in the remainder of the urban area will also be identified, where possible located so as to provide ready accessibility for residents to existing local or district centres. Alongside the focus on the central area, the delivery of a significant number of homes through a sustainable urban extension on greenfield	

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		<p>land at the Ipswich Garden Suburb will also occur during the plan period (see policy CS10). A cross border allocation for <del>future</del> development (within Ipswich Borough and Suffolk Coastal Local Plan area)</p> <p>for housing delivery, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, is also identified in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road. The allocation will be joint master planned with East Suffolk Council who has allocated land adjoining the Ipswich Borough boundary adjacent to the allocation within the Borough. This joint approach will help enable land within Ipswich Borough to come forward for housing.</p>	
CHAPTER 8: The Spatial Strategy	The standard method uses a	The standard method uses a	Paragraph ends abruptly – need to add in end of sentence

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Paragraph 8.10	formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-	formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under- <b><u>delivery.</u></b>	
CHAPTER 8: The Spatial Strategy  Paragraph 8.17	Infrastructure	<b><u>Infrastructure</u></b>	Change sub-title to bold for consistency
CHAPTER 8: The Spatial Strategy  Paragraph 8.20	Protection of the Environment	<b><u>Protection of the Environment</u></b>	Change sub-title to bold for consistency
CHAPTER 8: The Spatial Strategy  Paragraph 8.20	Suffolk contains extensive areas of nationally and internationally protected landscapes and habitats. A particular issue is the need to ensure that new development does not result in harm to the integrity of internationally designated Special Protection Areas, Special Areas of Conservation, Ramsar sites	Suffolk contains extensive areas of nationally and internationally protected landscapes and habitats. A particular issue is the need to ensure that new development does not result in harm to the integrity of internationally designated Special Protection Areas, Special Areas of Conservation, Ramsar sites	Change 'Coasts' to 'Coast' for correct AONB reference

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	and the Suffolk Coasts and Heaths AONB.	and the Suffolk Coasts and Heaths AONB.	
CHAPTER 8: The Spatial Strategy  Paragraph 8.20	Delivering development at the Borough boundary	<b><u>Delivering development at the Borough boundary</u></b>	Change sub-title to bold for consistency
CHAPTER 8: The Spatial Strategy  Paragraph 8.23	Ipswich Borough Council will work with neighbouring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough but adjacent to the boundary, where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner.	Ipswich Borough Council will work with neighbouring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough, but adjacent to the boundary, where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner.	Add comma to improve grammar
CHAPTER 8: The Spatial Strategy  Paragraphs 8.27 and 8.28	No space between paragraphs 8.27 and 8.28.	<b><u>Insert</u></b> space between paragraph 8.27 and 8.28.	Space required behind end of para 8.27 and 8.28  Remove apostrophe from end of para 8.27
CHAPTER 8: The Spatial Strategy	This section sets out five strategic issues that will form the central	This section sets out five strategic issues that will form the central	Change dash before 'i.e.' to comma to improve grammar

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Paragraph 8.31	component of the Ipswich spatial strategy - i.e. how and where growth is to be accommodated in order to deliver the Ipswich vision.	component of the Ipswich spatial strategy <sub>z</sub> - i.e. how and where growth is to be accommodated in order to deliver the Ipswich vision.	
CHAPTER 8: The Spatial Strategy Paragraph 8.46	The action plan includes measures to reduce flooding, manage the consequences of flooding, or prevent increased flooding – e.g. by preventing obstruction of flood paths.	The action plan includes measures to reduce flooding, manage the consequences of flooding, or prevent increased flooding <sub>z</sub> - e.g. by preventing obstruction of flood paths.	Change dash before 'e.g.' to comma to improve grammar
CHAPTER 8: The Spatial Strategy Paragraph 8.47	CABE Space - 'The benefits of urban trees' states a 10% increase in green cover can potentially eliminate the effects of climate change on increasing surface temperatures.	CABE Space - 'The benefits of urban trees' <sub>z</sub> states a 10% increase in green cover can potentially eliminate the effects of climate change on increasing surface temperatures.	Add in dash after title of paper to improve grammar
CHAPTER 8: The Spatial Strategy Paragraph 8.49	Shading can also be helpful in the control of aquatic vegetation and well as bringing benefits for people.	Shading can also be helpful in the control of aquatic vegetation <del>and</del> <u>as</u> well as bringing benefits for people.	Change 'and' to 'as' to improve grammar
CHAPTER 8: The Spatial Strategy Paragraph 8.50	Functional ecosystem can also mitigate the risks associated with downstream flooding from extreme rainfall events.	Functional ecosystems <sub>z</sub> can also mitigate the risks associated with downstream flooding from extreme rainfall events.	Change from 'ecosystem' to ecosystems' to improve grammar

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
CHAPTER 8: The Spatial Strategy  Paragraph 8.53 – h	Development demonstrating principles of high quality architecture and urban design and which enhances the public realm, ensures the security and safety of residents and is resilient to climate change.	Development demonstrating principles of high quality architecture and urban design <del>and</del> which enhances the public realm, ensures the security and safety of residents and is resilient to climate change.	Remove ‘and’ to improve grammar
CHAPTER 8: The Spatial Strategy  Paragraph 8.54	This approach to the location of development is centred on the town centre (which includes the Portman Quarter – formerly called Ipswich Village - and the Waterfront), Ipswich Garden Suburb, the northern part of Humber Doucy Lane in the longer term and on the town's district centres.	This approach to the location of development is centred on the town centre (which includes the Portman Quarter – formerly called Ipswich Village <u>–</u> and the Waterfront), Ipswich Garden Suburb, the northern part of Humber Doucy Lane in the longer term and on the town's district centres.	Remove dash between ‘Village’ and ‘and’
CHAPTER 8: The Spatial Strategy  Paragraph 8.72 – g	Identifying an ecological network across Ipswich and linking into adjacent areas, and protecting and enhancing it in accordance with policy DM8 to maximise the benefits of ecosystem services and provide net gains for biodiversity to enable delivery through development	Identifying an ecological network across Ipswich and linking into adjacent areas, and protecting and enhancing it in accordance with policy DM8 to maximise the benefits of ecosystem services and provide net gains for biodiversity to enable delivery through development <del>proportion</del>	Change ‘proportion’ to ‘proportionate’ to improve grammar

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	proportion to the scale of that development.	<b>proportionate</b> to the scale of that development.	
CHAPTER 8: The Spatial Strategy  Paragraph 8.79	The network includes internationally, nationally and local designated sites which are protected in accordance with the National Planning Policy Framework.	The network includes internationally, nationally and <b>locally</b> designated sites which are protected in accordance with the National Planning Policy Framework.	Change from ‘local’ to ‘locally’ for consistency
CHAPTER 8: The Spatial Strategy  Paragraph 8.79	The Anglian River Basin Management Plan sets out measures which aim to achieve the water body status objectives and wider objectives of the European Water Framework Directive no deterioration of waterbodies and ultimately improving all water bodies to a good standard by 2027.	The Anglian River Basin Management Plan sets out measures which aim to achieve the water body status objectives and wider objectives of the European Water Framework Directive; no deterioration of waterbodies and ultimately improving all water bodies to a good standard by 2027.	Add ‘:’ after ‘Directive’ to improve grammar
CHAPTER 8: The Spatial Strategy  Paragraph 8.79	The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 require all public bodies, in exercising their functions so far as affecting a river basin district, have regard to the river basin management plan for that district.	The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 require all public bodies, in exercising their functions so far as affecting a river basin district, <b>to</b> have regard to the river basin management plan for that district.	Add ‘to’ to improve grammar

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
CHAPTER 8: The Spatial Strategy  Paragraph 8.81	The Stour and Orwell Estuary Special Protection Area is protected under the Birds Directive due its importance for bird populations.	The Stour and Orwell Estuary Special Protection Area is protected under the Birds Directive due <b>to</b> its importance for bird populations.	Add ‘to’ to improve grammar
POLICY CS4  l)	“conserve and enhance the character and appearance of conservation areas, by preparing and reviewing where necessary character appraisals and using them to guide decisions about development;”	“conserve and enhance the character and appearance of conservation areas, by preparing and reviewing where necessary <del>character</del> appraisals and using them to guide decisions about development;”	Correct terminology.
POLICY CS4  Paragraph 8.77	“All conservation areas have been the subject of detailed Conservation Area Character Appraisals.”	“All conservation areas have been the subject of detailed Conservation Area <del>Character</del> Appraisals.”	Correct terminology.
Policy CS4	“South-East Inshore Marine Plan”	<b><u>Draft South-East <del>Inshore</del> Marine Plan and East Inshore Marine Plan and East Offshore Marine Plan</u></b>	Correct terminology.
Policy CS4  Paragraph 8.78	The Orwell Estuary will be covered by the South East Inshore Marine Plan when it is completed (consultation took place early in 2018). This will set out priorities and directions for future development within the plan area, inform	The Orwell Estuary will be covered by the South East <del>Inshore</del> Marine Plan when it is completed, (consultation took place early in 2018 <b><u>and 2020</u></b> ). This will set out priorities and directions for future development within the plan area, inform sustainable	Correct terminology.  In response to Representation ID 26548 (Marine Management Organisation)

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	sustainable use of marine resources, and help marine users understand the best locations for their activities, including where new developments may be appropriate. An South East Inshore and South East Offshore Marine Plan was adopted on 2nd April 2014 which covers an area adjacent to the Suffolk Coast north of the River Orwell.	use of marine resources, and help marine users understand the best locations for their activities, including where new developments may be appropriate. An <del>South</del> -East Inshore and <del>South</del> East Offshore Marine Plan was adopted on 2nd April 2014 which covers an area adjacent to the Suffolk Coast north of the River Orwell.	
Policy CS4 Paragraph 8.81	There are also large areas of Inshore Marine Special Protection Area extending eastwards from the Suffolk and Essex Coast, which form part of the marine protected area identified in the South East Inshore and South East Offshore Marine Plan.	There are also large areas of Inshore Marine Special Protection Area extending eastwards from the Suffolk and Essex Coast, which form part of the marine protected area identified in the <b><u>Draft</u></b> South East <b><u>Marine Plan, Inshore and South East Inshore and East Offshore Marine Plans.</u></b>	In response to Representation ID 26548 (Marine Management Organisation)
POLICY DM12 9.12.11	“The character and distinctiveness of Ipswich is the product of a combination of Ipswich's geographical setting, history and communities. The	“The character and distinctiveness of Ipswich is the product of a combination of Ipswich's geographical setting, history and communities. The	Correct terminology.

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	character of different areas of Ipswich is analysed through the conservation area character appraisals..."	character of different areas of Ipswich is analysed through the conservation area <del>character</del> appraisals..."	
CHAPTER 8: The Spatial Strategy  Paragraph 8.103	Work is also ongoing on a Suffolk Framework for Growth, which the Council resolved on 6th March 2018 (report reference E/17/74) future versions of the Ipswich Local Plan would have regard to.	Work is also ongoing on a Suffolk Framework for Growth, which the Council resolved on 6th March 2018 (report reference E/17/74) <b><u>and which</u></b> future versions of the Ipswich Local Plan would have regard to.	Add 'and which' to improve grammar
POLICY CS8  Paragraph 8.113	In considering the most appropriate mix of homes by size and type for major residential development proposals, the Council will take a flexible approach having regard to the needs identified through the Ipswich Strategic Housing Market Assessment, where it remains up to date, any other evidence of local needs supported by the Council and the policies of this plan.	In considering the most appropriate mix of homes by size and type for major residential development proposals, the Council will take a flexible approach having regard to the needs identified through the Ipswich Strategic Housing Market Assessment, where it remains up to date, <b><u>and</u></b> any other evidence of local needs supported by the Council and the policies of this plan.	Add 'and' to improve grammar
POLICY CS10  Paragraph 8.126	Paragraph 72 of the National Planning Policy Framework states that the supply of large number of new	Paragraph 72 of the National Planning Policy Framework states that the supply of large numbers <u>s</u> of new homes can	Change from 'number' to 'numbers' to improve grammar

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	homes can often be best achieved through planning for larger scale development, such as extensions to existing towns, provided they are well located and designed and supported by the necessary infrastructure and facilities.	often be best achieved through planning for larger scale development, such as extensions to existing towns, provided they are well located and designed and supported by the necessary infrastructure and facilities.	
POLICY CS10 Paragraph 8.128	Public Open space, sport and recreation facilities including dual use playing fields	Public <u>o</u> pen space, sport and recreation facilities including dual use playing fields	Remove capital 'O' from 'open'
POLICY CS10 Paragraph 8.132	The infrastructure requirements at the Garden Suburb will be significant and include new roads ecological networks and green corridors, new public transport routes and services, green infrastructure such as allotments and sports facilities, new schools, new recreation provision, healthcare provision and local shopping facilities.	The infrastructure requirements at the Garden Suburb will be significant and include new roads <sub>2</sub> ecological networks and green corridors, new public transport routes and services, green infrastructure such as allotments and sports facilities, new schools, new recreation provision, healthcare provision and local shopping facilities.	Add comma to improve grammar
POLICY CS11 Paragraph 8.142	Sites for Gypsies and Travellers could be privately or publicly provided - the criteria will apply equally to both, as	Sites for Gypsies and Travellers could be privately or publicly provided - the criteria will apply equally to both, as	Remove phrase to avoid repetition

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	they are about creating safe and healthy living conditions and providing sites within a reasonable distance of basic services such as schooling. Basic services include primary school, secondary school, convenience store, health centre or GP surgery, children's play facility, pharmacy and meeting place.	they are about creating safe and healthy living conditions and providing sites within a reasonable distance of basic services <del>such as schooling</del> . Basic services include primary school, secondary school, convenience store, health centre or GP surgery, children's play facility, pharmacy and meeting place.	
POLICY CS13  Paragraph 8.171	<ul style="list-style-type: none"> <li>Advanced agriculture food and drink;</li> </ul>	<ul style="list-style-type: none"> <li>Advanced agriculture, food and drink;</li> </ul>	Add comma to improve grammar
POLICY CS15  Paragraph 8.192	The Council has taken a positive approach to identifying sites for such provision through policy CS10 of the Core Strategy and Policies Development Plan Document Review and policy SP7 of the Site Allocations and Policies (incorporating IP-One Area Action Plan) development Plan Document.	The Council has taken a positive approach to identifying sites for such provision through policy CS10 of the Core Strategy and Policies Development Plan Document Review and policy SP7 of the Site Allocations and Policies (incorporating IP-One Area Action Plan) <u>D</u> evelopment Plan Document.	Add capital 'D' to 'Development' for consistency
POLICY CS15	The Council is supportive of the principle to substantially upgrade	The Council is supportive of the principle to substantially upgrade	Remove dash between 'facilities' and 'and' to improve grammar

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Paragraph 8.193	education facilities – and recognises that there is a need for substantial regeneration within existing sites.	education facilities <del>–and</del> recognises that there is a need for substantial regeneration within existing sites.	
POLICY CS16 Paragraph 8.199	Ipswich contains a variety of public and private open spaces, sport and recreation facilities that serve a range of different functions.	Ipswich contains a variety of public and private open spaces, <u>and</u> sport and recreation facilities that serve a range of different functions.	Replace comma with 'and' to improve grammar
POLICY CS16 Paragraph 8.201	The Council will enhance and extend the ecological network and green corridors, blue corridors, open spaces, sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk.	The Council will enhance and extend the ecological network and green corridors, blue corridors, open spaces, <u>and</u> sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk.	Replace comma with 'and' to improve grammar
POLICY CS16 Paragraph 8.202	The Council considers that an integrated network of accessible open spaces, sport and recreation facilities is an essential part of the Borough's infrastructure and character.	The Council considers that an integrated network of accessible open spaces, <u>and</u> sport and recreation facilities is an essential part of the Borough's infrastructure and character.	Replace comma with 'and' to improve grammar
POLICY CS16	A development management policy in Section C of this document and	A development management policy in Section C of this document and	Replace comma with 'and' to improve grammar

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Paragraph 8.203	Appendix 4 set out the local standards of provision of open spaces, sport and recreation facilities, based on the Ipswich PPG17 Study, which has been updated by the Council's Parks and Open Spaces team.	Appendix 4 set out the local standards of provision of open spaces, <b>and</b> sport and recreation facilities, based on the Ipswich PPG17 Study, which has been updated by the Council's Parks and Open Spaces team.	
POLICY CS16 Paragraph 8.204	Such measures can provide benefits in terms of biodiversity, amenity, health and wellbeing and should be incorporate into the scheme design from the outset.	Such measures can provide benefits in terms of biodiversity, amenity, health and wellbeing and should be incorporated into the scheme design from the outset.	Change 'incorporate' to 'incorporated' to improve grammar
POLICY CS20 Paragraph 8.245	The delivery of a Wet Dock crossing (i.e. a new road linking Holywells Road/Duke Street with Hawes Street the subject of ongoing work.	The delivery of a Wet Dock crossing, i.e. a new road linking Holywells Road/Duke Street with Hawes Street, <b>is</b> the subject of ongoing work.	Replace '(' with a comma and add a comma and the word 'is' after the word 'Street' to improve grammar
POLICY DM1 Paragraph 9.1.1	New development in Ipswich has the potential to increase carbon dioxide emissions in the borough.	New development in Ipswich has the potential to increase carbon dioxide emissions in the <b>B</b> orough.	Change 'borough' to 'Borough' for consistency
POLICY DM1 Paragraph 9.1.5	In light of this the Council will require new residential development to meet water efficiency standards of 110 litres/person/day (as provided for in the	In light of this the Council will require new residential development to meet water efficiency standards of 110 litres/person/day (as provided for in the	Swap position of bracket and full stop to improve grammar

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	Requirement G2 and Reg36 from Part G of Schedule 1 and regulation 36 to the Building Regulations 2010, as amended - rather than the Building Regulations requirements of 125 litres/person/day.)	Requirement G2 and Reg36 from Part G of Schedule 1 and regulation 36 to the Building Regulations 2010, as amended - rather than the Building Regulations requirements of 125 litres/person/day).	
POLICY DM1 Paragraph 9.1.6	Climate change predictions suggest that Ipswich may experience increased instances of flooding risks, during hotter drier summers and warmer wetter winters.	Climate change predictions suggest that Ipswich may experience increased instances of flooding risks, during hotter, drier summers and warmer, wetter winters.	Add commas to improve grammar
POLICY DM1 Paragraph 9.1.9	The Building Research Establishment is introducing a Home Quality Mark which is five star rating demonstrating a home's performance in terms of a number of factors including energy use, running costs, air quality, noise, accessibility to amenities, fast and secure internet access and the ease of use of the home by the occupants.	The Building Research Establishment is introducing a Home Quality Mark which <u>a</u> is five star rating demonstrating a home's performance in terms of a number of factors including energy use, running costs, air quality, noise, accessibility to amenities, fast and secure internet access and the ease of use of the home by the occupants.	Add 'a' to improve grammar
POLICY DM2 Paragraph 9.2.4	In such circumstances the Council may agree to a lower percentage provision being achieved where the introduction	In such circumstances the Council may agree to a lower percentage provision being achieved where <del>the introduction</del>	Change sentence structure to make more sense

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	of additional energy efficiency measures (i.e. additional to those required under policy DM1 such as passive house design or other inbuilt energy efficiency measures) to achieve an equivalent reduction in carbon emissions.	<del>of</del> additional energy efficiency measures (i.e. additional to those required under policy DM1 such as passive house design or other inbuilt energy efficiency measures) to achieve an equivalent reduction in carbon emissions <b><u>are introduced</u></b> .	
POLICY DM3  Paragraph 9.3.4	Affect biodiversity. In particular, is it likely to result in deposition or concentration of pollutants that significantly affect a European-designated wildlife site, and is not directly connected with or necessary to the management of the site, or does it otherwise affect biodiversity, particularly designated wildlife sites.	Affect biodiversity. In particular, <b><u>if it is</u></b> <del>is it</del> likely to result in deposition or concentration of pollutants that significantly affect a European-designated wildlife site, and is not directly connected with or necessary to the management of the site, or <del>does</del> <b><u>if</u></b> it otherwise affects biodiversity, particularly designated wildlife sites.	Change sentence structure to make more sense
POLICY DM4 - a	a. it does not increase the overall risk of all forms of flooding in the area or elsewhere through the layout and form of the development and wherever practicable appropriate	a. it does not increase the overall risk of all forms of flooding in the area or elsewhere through the layout and form of the development, and wherever practicable, <b><u>introduces</u></b> appropriate	Change sentence structure to make more sense

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
	application of Sustainable Drainage Systems (SuDS)	application of Sustainable Drainage Systems (SuDS)	
POLICY DM5  Paragraph 9.5.1	They can deliver social, economic and environmental values – public health and well-being, health and fitness, air quality, water flood management, help tackle climate change, regeneration, the image of the town, ecology nature and biodiversity, green transport and community cohesion, for example.	They can deliver social, economic and environmental values – public health and well-being, health and fitness, air quality, water flood management, help tackle climate change, regeneration, the image of the town, ecology, nature and biodiversity, green transport and community cohesion, for example.	Add comma to improve grammar
POLICY DM6	In all new residential developments of 10 dwellings or more (or on sites of 0.5ha or more), the Council will require provision of high-quality open spaces, sport and recreation facilities to meet the needs of their occupiers.	In all new residential developments of 10 dwellings or more (or on sites of 0.5ha or more), the Council will require provision of high-quality open spaces, <b>and</b> sport and recreation facilities to meet the needs of their occupiers.	Change comma to 'and' to improve grammar
POLICY DM6	New open spaces, sport and recreation facilities should provide ecological enhancements as part of their design and implementation.	New open spaces, <b>and</b> sport and recreation facilities should provide ecological enhancements as part of their design and implementation.	Change comma to 'and' to improve grammar
POLICY DM6	open space over and above site landscaping should be provided where	<b>O</b> pen space over and above site landscaping should be provided where	Add capital letter at beginning of sentence

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
	appropriate, for the health and wellbeing of employees.	appropriate, for the health and wellbeing of employees.	
POLICY DM6  Paragraph 9.6.4	However, where an under provision of open space, new facilities or other contributions is required to achieve scheme viability – that results in a poor environment for new residents will be deemed unacceptable.	However, where an under provision of open space, new facilities or other contributions is required to achieve scheme viability, - that results in a poor environment for new residents, <b>this</b> will be deemed unacceptable.	Change sentence structure to improve grammar
POLICY DM7	In this regard the principles within the Space and Design Guidelines SPD should be applied.	In this regard, the principles within the Space and Design Guidelines SPD should be applied.	Add comma to improve grammar and sentence structure
POLICY DM7	Should this requirement unavoidably conflict with the need to meet other density and urban design requirements of the plan or an applicant is able to demonstrate that a lower figure would be acceptable having regard to the particular circumstances of the proposals the Council will expect applicants to demonstrate that adequate provision of	Should this requirement unavoidably conflict with the need to meet other density and urban design requirements of the plan or an applicant is able to demonstrate that a lower figure would be acceptable having regard to the particular circumstances of the proposals, the Council will expect applicants to demonstrate that adequate provision of -private outdoor amenity space will be provided for the occupants of the proposed dwellings.	Add comma to improve grammar and sentence structure. Delete extra space between “of” and “private”

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	private outdoor amenity space will be provided for the occupants of the proposed dwellings.		
POLICY DM7 Paragraph 9.7.1	Such space is needed for sitting out socialising, play, drying washing, and gardening (flowers and food) and is key to the creation of a sustainable residential environment in terms of: <ul style="list-style-type: none"> <li>• its contribution to liveability and to urban greening</li> <li>• the preservation and/or enhancement of local biodiversity and</li> <li>• ecological networks.</li> </ul>	Such space is needed for sitting out socialising, play, drying washing, and gardening (flowers and food) and is key to the creation of a sustainable residential environment in terms of: <ul style="list-style-type: none"> <li>• its contribution to liveability and to urban greening;</li> <li>• the preservation and/or enhancement of local biodiversity and;</li> <li>• ecological networks.</li> </ul>	Add semi-colons to list to improve grammar
POLICY DM8 Paragraph 9.8.1	The overall aim of this policy is to contribute to the international and national objective to halt the overall decline in and to improve biodiversity, by the protection and creation of key habitats; and the maintenance of linked, coherent ecological networks, so that populations of species are not isolated.	The overall aim of this policy is to contribute to the international and national objective to halt the overall decline in and to improve biodiversity, by the protection and creation of key habitats; and the maintenance of linked, coherent ecological networks, so that populations of species are not isolated.	Change semi-colon to comma to improve grammar

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POLICY DM8  Paragraph 9.8.12	It is important that planning decision are based on up to date ecological reports and survey data.	It is important that planning decisions are based on up to date ecological reports and survey data.	Change 'decision' to 'decisions' to improve grammar
POLICY DM9	Where development affecting trees or hedgerows is proposed, the application must be accompanied by: f. an accurate survey and assessment of all existing trees and hedgerows on site in accordance with BS5837 'Trees in relation to design, demolition and construction – Recommendations)' 2012 by a competent arborist; and  g. details of protective measures to be put in place during the development process to ensure the health and safety of each specimen and hedgerow to be retained; and	Where development affecting trees or hedgerows is proposed, the application must be accompanied by: f. an accurate survey and assessment of all existing trees and hedgerows on site in accordance with BS5837 'Trees in relation to design, demolition and construction – Recommendations)' 2012 by a competent arborist; <del>and</del>  g. details of protective measures to be put in place during the development process to ensure the health and safety of each specimen and hedgerow to be retained; and	Remove 'and' from point f in list

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
	h. where removal of a mature or semi-mature tree or hedgerow is proposed, a plan for replacement planting on a two for one basis or better and using semi-mature specimens, unless otherwise agreed by the Council.	h. where removal of a mature or semi-mature tree or hedgerow is proposed, a plan for replacement planting on a two for one basis or better and using semi-mature specimens, unless otherwise agreed by the Council.	
POLICY DM9 Paragraph 9.9.1	The Charter’s ambition is “to place trees and woods at the centre of national decision making, and back at the heart of our lives and communities.	The Charter’s ambition is “to place trees and woods at the centre of national decision making, and back at the heart of our lives and communities”.	Add speech marks to end of quote
POLICY DM9 Paragraph 9.9.4	We will take a right tree/ plant for the right site approach which takes account of: <ul style="list-style-type: none"> <li>• the amenity value of any trees to be removed,</li> <li>• ecology,</li> <li>• opportunities to retain existing and plant new appropriate native species or riparian trees where possible,</li> <li>• historic context,</li> <li>• availability of space,</li> </ul>	We will take a right tree/ plant for the right site approach which takes account of: <ul style="list-style-type: none"> <li>• the amenity value of any trees to be removed;</li> <li>• ecology;</li> <li>• opportunities to retain existing and plant new appropriate native species or riparian trees where possible;</li> <li>• historic context;</li> <li>• availability of space;</li> </ul>	Change commas in list to semi-colons to improve grammar

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
	<ul style="list-style-type: none"> <li>• soil conditions including hydrogeology,</li> <li>• potential improvements to air and soil quality,</li> <li>• reducing the effects of and adapting to climate change; and</li> <li>• the guidance provided in BS 8545 Trees: from nursery to independence in the landscape – Recommendations’.</li> </ul>	<ul style="list-style-type: none"> <li>• soil conditions including hydrogeology<del>7</del>;</li> <li>• potential improvements to air and soil quality<del>7</del>;</li> <li>• reducing the effects of and adapting to climate change; and</li> <li>• the guidance provided in BS 8545 Trees: from nursery to independence in the landscape – Recommendations’.</li> </ul>	
POLICY DM11  Paragraph 9.11.3	The definition of major development in respect of development within the AONB is defined by footnote 55 of the NPPF and is matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.	The definition of major development in respect of development within the AONB is defined by footnote 55 of the NPPF and is <u>a</u> matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.	Add ‘a’ before ‘matter’ to improve grammar
POLICY DM12	The Council will require all new development to be well-designed and sustainable. In the plan area this will mean layouts and designs that provide	The Council will require all new development to be well-designed and sustainable. In the plan area this will mean layouts and designs that provide	Remove comma to improve grammar

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
	a safe, and attractive public realm capable of being used by all.	a safe, and attractive public realm capable of being used by all.	
POLICY DM12	i. ensuring good architectural design that responds to and reflects its setting, is sustainable, accessible and designed for long life by being capable of adaptation to changing needs and uses over time and demonstrate the principles of dementia-friendly design.	i. ensuring good architectural design that responds to and reflects its setting, is sustainable, accessible and designed for long life by being capable of adaptation to changing needs and uses over time and demonstrates the principles of dementia-friendly design.	Change ‘demonstrate’ to ‘demonstrates’ to improve grammar
POLICY DM12 Paragraph 9.12.5	Development should seek to adopt the principles of dementia-friendly design: <ul style="list-style-type: none"> <li>• Familiar environments – functions of places and buildings are obvious, any changes are small scale and incremental;</li> <li>• Legible environment – a hierarchy of street types, which are short and fairly narrow.</li> <li>• Clear signs at decision points;</li> <li>• Distinctive environment – A variety of landmarks, with architectural features in a variety of styles and</li> </ul>	Development should seek to adopt the principles of dementia-friendly design: <ul style="list-style-type: none"> <li>• Familiar environments – functions of places and buildings are obvious, any changes are small scale and incremental;</li> <li>• Legible environment – a hierarchy of street types, which are short and fairly narrow;</li> <li>• Clear signs at decision points;</li> <li>• Distinctive environment – A variety of landmarks, with architectural features in a variety of styles and materials.</li> </ul>	Change full stop to semi-colon at the end of the second point in the list to improve grammar

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	<p>materials. There is a variety of practical features (e.g. trees and street furniture); and</p> <ul style="list-style-type: none"> <li>• Accessible environment – Land uses are mixed with shops and services within a 5-10 minute walk from housing. Entrances to places are obvious and easy to use and conform to disabled access regulations.</li> </ul>	<p>There is a variety of practical features (e.g. trees and street furniture); and</p> <ul style="list-style-type: none"> <li>• Accessible environment – Land uses are mixed with shops and services within a 5-10 minute walk from housing. Entrances to places are obvious and easy to use and conform to disabled access regulations.</li> </ul>	
<p>POLICY DM12</p> <p>Paragraph 9.12.9</p>	<p>Trees also contribute to health, welfare and quality of life of everyone who lives and works in the urban environmental along with being an additional habitat for wildlife.</p>	<p>Trees also contribute to health, welfare and quality of life of everyone who lives and works in the urban environmental along with being an additional habitat for wildlife.</p>	<p>Change 'environmental' to 'environment' to improve grammar</p>
<p>POLICY DM12</p> <p>Paragraph 9.12.17</p>	<p>It will be necessary to ensure that the siting, layout, scale, form, massing, materials and detailing of any proposed buildings will have a positive visual relationship with surrounding buildings. Matters of silhouette, proportion, and solid to void ratios and anti-reflective glass, will all be</p>	<p>It will be necessary to ensure that the siting, layout, scale, form, massing, materials and detailing of any proposed buildings will have a positive visual relationship with surrounding buildings. Matters of silhouette, proportion, and solid to void ratios and anti-reflective glass, will all be important considerations to be addressed.</p>	<p>Add full stop at end of paragraph</p>

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
	important considerations to be addressed		
POLICY DM12 Paragraph 9.12.18	This includes the provision of adequate storage in new developments, be that for wheelie bins, cycles, or for the storage of mobility scooters.	This includes the provision of adequate storage in new developments, be that for wheelie bins, <b>and</b> cycles, or for the storage of mobility scooters.	Replace comma with ‘and’ to improve grammar
POLICY DM13	To preserve and enhance the Borough’s 600+ listed buildings, the Council will:  a) support proposals for alterations and extensions to listed buildings where there would be no harm to the special architectural and historic interest of the building. This will consider the design, scale, materials and appearance with regard to the significance of the listed building; b) support proposals for the change of use of a listed building where the use	To preserve and enhance the Borough’s 600+ listed buildings, the Council will:  a) support proposals for alterations and extensions to listed buildings where there would be no harm to the special architectural and historic interest of the building. This will consider the design, scale, materials and appearance with regard to the significance of the listed building; b) support proposals for the change of use of a listed building where the use will retain elements of the building	Change semi-colon to full stop at end of list

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	<p>will retain elements of the building which contribute to the building's significance, including internal features, historic fabric, plan form, appearance and layout;</p> <p>c) support development within the setting of listed buildings that would not cause harm to the significance of the building through the introduction of sympathetic development in the building's setting, retaining a curtilage appropriate to the listed building; and</p> <p>d) only in exceptional circumstances grant listed building consent for the total or substantial demolition of a listed building;</p>	<p>which contribute to the building's significance, including internal features, historic fabric, plan form, appearance and layout;</p> <p>c) support development within the setting of listed buildings that would not cause harm to the significance of the building through the introduction of sympathetic development in the building's setting, retaining a curtilage appropriate to the listed building; and</p> <p>d) only in exceptional circumstances grant listed building consent for the total or substantial demolition of a listed building.</p>	
POLICY DM13	<p>The Council will:</p> <ul style="list-style-type: none"> <li>• require development within conservation areas to protect and enhance the special interest, character</li> </ul>	<p>The Council will:</p> <ul style="list-style-type: none"> <li>• require development within conservation areas to protect and enhance the special interest, character</li> </ul>	Change full stop to semi-colon at the end of points 2, 3 and 4 in list

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	<p>and appearance of the area and its setting;</p> <ul style="list-style-type: none"> <li>• require the position, mass, layout, appearance and materials of proposed development, and the design of the space and landscaping around it, to pay regard to the character of adjoining buildings and the area as a whole.</li> <li>• ensure that proposed changes of use within or adjacent to conservation areas would not detract from the special interest, character and appearance of the designated area, which should include sympathetic alterations and additions to facades that are visible from the public domain and the retention of any existing features of special architectural merit.</li> <li>• preserve trees and garden spaces which contribute to the character and</li> </ul>	<p>and appearance of the area and its setting;</p> <ul style="list-style-type: none"> <li>• require the position, mass, layout, appearance and materials of proposed development, and the design of the space and landscaping around it, to pay regard to the character of adjoining buildings and the area as a whole.;</li> <li>• ensure that proposed changes of use within or adjacent to conservation areas would not detract from the special interest, character and appearance of the designated area, which should include sympathetic alterations and additions to facades that are visible from the public domain and the retention of any existing features of special architectural merit.;</li> <li>• preserve trees and garden spaces which contribute to the character and</li> </ul>	

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	<p>appearance of a conservation area or which contribute to the significance of the area by being located in the setting of the conservation area.</p> <ul style="list-style-type: none"> <li>• only in exceptional circumstances grant permission for the total or substantial</li> </ul> <p>demolition of an unlisted building that makes a positive contribution to the special interest and significance of a conservation area; and</p> <ul style="list-style-type: none"> <li>• Consider the withdrawal of permitted development rights where they present a threat to the protection of the character and special interest of the conservation area.</li> </ul>	<p>appearance of a conservation area or which contribute to the significance of the area by being located in the setting of the conservation area;</p> <ul style="list-style-type: none"> <li>• only in exceptional circumstances grant permission for the total or substantial</li> </ul> <p>demolition of an unlisted building that makes a positive contribution to the special interest and significance of a conservation area; and</p> <ul style="list-style-type: none"> <li>• Consider the withdrawal of permitted development rights where they present a threat to the protection of the character and special interest of the conservation area.</li> </ul>	
POLICY DM15	b. achieving a building that is of the highest architectural quality;	b. <del>achieving</del> <b>achieves</b> a building that is of the highest architectural quality;	Change ‘achieving’ to ‘achieves’ to improve grammar and consistency with other points in list

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
POLICY DM15 Paragraph 9.15.2	Proposals should consider and comply with the Historic England Tall Buildings Advice Note (4) 2015 as appropriate.	Proposals should consider and comply with the Historic England Tall Buildings Advice Note (4) 2015 <sub>2</sub> as appropriate.	Add comma to improve grammar
POLICY DM15 Paragraph 9.15.6	To achieve this, applicants should consider whether the building materials (e.g. cladding) is suitable from the outset and that built-in emergency responses to fire, such as sprinkler systems, are accounted for.	To achieve this, applicants should consider whether the building materials (e.g. cladding) <del>is</del> <b>are</b> suitable from the outset and that built-in emergency responses to fire, such as sprinkler systems, are accounted for.	Change ‘is’ to ‘are’ to improve grammar
POLICY DM16 Paragraph 9.16.4	As such an extension or self-contained annex should not result in the loss of more than 50% of the useable private garden area.	As such <sub>2</sub> an extension or self-contained annex should not result in the loss of more than 50% of the useable private garden area.	Add comma to improve grammar
POLICY DM17 Paragraph 9.17.2	The potential exists for quality design approached which contrast positively with the surrounding architectural character, and this will be encouraged where there is no conflict in terms of scale, density, vehicle use or other considerations.	The potential exists for <b>a</b> quality design <del>approached</del> which <del>contrast</del> <b>s</b> positively with the surrounding architectural character, and this will be encouraged where there is no conflict in terms of scale, density, vehicle use or other considerations.	Improve sentence structure

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POLICY DM20	f. Are well-served by local services and accessible by sustainable transport modes	f. Are well-served by local services and accessible by sustainable transport modes.	Add full stop to last point on list
POLICY DM20  All paragraphs	9.19.XX	<del>9.19.XX</del> <b>9.20.XX</b>	Paragraph numbering is incorrect and duplicates that from POLICY DM19
POLICY DM20  Paragraph 9.19.2	An application for planning permission will not be required where there are not more than six person living together as a single household.	An application for planning permission will not be required where there are not more than six persons living together as a single household.	Change 'person' to 'persons' to improve grammar
POLICY DM21	Applicants will be required to demonstrate how any adverse transport impacts would be acceptably managed and mitigated.	Applicants will be required to demonstrate how any adverse transport impacts would be acceptably managed and mitigated.	Remove underscore
POLICY DM21  Paragraph 9.21.4	This Council also expects development on sites which abut or relate closely to the town's rivers to provide for the improvement of public access alongside them.	<del>This</del> <b>The</b> Council also expects development on sites which abut or relate closely to the town's rivers to provide for the improvement of public access alongside them.	Change 'this' to 'the'

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POLICY DM21 Paragraph 9.21.5	Criterion e. of the policy would not be applied unreasonably if limited parts of a development were unavoidably slightly further than 400m from public transport.	Criterion <del>e.f.</del> of the policy would not be applied unreasonably if limited parts of a development were unavoidably slightly further than 400m from public transport.	Clause f. is the one which addresses access to public transport.
POLICY DM21 Paragraph 9.21.8	In proposals for the development of 30 to 49 dwellings, 1,500 – 2,499 sq. m B1, 2,500 – 3,999 sq. m B2/B8, or 800 – 1,499 sq. m retail a transport statement will generally be required with a planning application.	In proposals for the development of 30 to 49 dwellings, 1,500 – 2,499 sq. m B1, 2,500 – 3,999 sq. m B2/B8, or 800 – 1,499 sq. m retail, a transport statement will generally be required with a planning application.	Add comma to improve sentence structure
POLICY DM23 Paragraph 9.23.6	The exceptions in the above policy allow a degree of flexibility in controlled conditions, such as for example to protect heritage assets and landscape.	The exceptions in the above policy allow a degree of flexibility in controlled conditions, <del>such as</del> for example to protect heritage assets and landscape.	Remove 'such as' to improve grammar
POLICY DM24	Community Facilities	<b><u>Community Facilities</u></b>	Make subtitle bold for consistency
POLICY DM24	Public Houses	<b><u>Public Houses</u></b>	Make subtitle bold for consistency

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POLICY DM24 Paragraph 9.24.8	The policy therefore aims to afford greater protection to the boroughs public houses.	The policy therefore aims to afford greater protection to the <u>B</u> orough’s public houses.	Change ‘boroughs’ to ‘Borough’s’ to improve grammar
POLICY DM26 Paragraph 9.26.6	• endanger pedestrians forcing them to step on to the road.	• endanger pedestrians <u>by</u> forcing them to step on to the road.	Add ‘by’ to improve grammar
POLICY DM27 Paragraph 9.27.1	Many of the units are listed buildings. It is in this zone and the secondary shopping zone where there are the majority of unlet units. Again, the Council supports the use of unlet units for pop-up shops and restaurants as in the Secondary shopping zone above.	Many of the units are listed buildings. It is in this zone and the <u>S</u> econdary <u>S</u> hopping <u>Z</u> one where there are the majority of unlet units. Again, the Council supports the use of unlet units for pop-up shops and restaurants as in the <u>S</u> econdary <u>S</u> hopping <u>Z</u> one above.	Capitalise ‘Secondary Shopping Zone’ for consistency
POLICY DM28	In order to demonstrate that the current use is unviable sufficient marketing evidence should be provided.	In order to demonstrate that the current use is unviable, sufficient marketing evidence should be provided.	Add comma to improve grammar
POLICY DM28	Further information regarding the requirement of the marketing strategy are set out in appendix 6	Further information regarding the requirement of the marketing strategy <del>are</del> <u>is</u> set out in appendix 6.	Change ‘are’ to ‘is’ and add full stop at end of sentence to improve grammar

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
POLICY DM28 Paragraph 9.28.5	Retaining and enhancing existing facilities will benefit heritage assets that are currently used for arts, cultural and tourism purposes, while new facilities could also be beneficial provided they are appropriately design and located.	Retaining and enhancing existing facilities will benefit heritage assets that are currently used for arts, cultural and tourism purposes, while new facilities could also be beneficial, provided they are appropriately design <u>ed</u> and located.	Add comma and change 'design' to 'designed' to improve grammar
POLICY DM29	The council will encourage and support the sustainable growth of Ipswich's evening and night-time economy which will contribute to the vitality of the town centre, subject to addressing the following considerations:	The <u>C</u> ouncil will encourage and support the sustainable growth of Ipswich's evening and night-time economy which will contribute to the vitality of the town centre, subject to addressing the following considerations:	Change 'council' to 'Council' for consistency
POLICY DM29 Paragraph 9.29.2	The promotion of an evening and night- time economy in Ipswich needs to be appropriately managed to ensure that community safety is protected and anti-social behaviour is not increased.	The promotion of an evening and night-time economy in Ipswich needs to be appropriately managed to- ensure that community safety is protected and anti-social behaviour is not increased.	Reduce spacing between 'to' and 'ensure'
POLICY DM30 Paragraph 9.30.6	Zonal maps for each District Centre to support community facilities within	Zonal maps for each District Centre to support community facilities within <u>a</u>	Add 'a' and comma to improve grammar

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
	400m straight-line distance are defined on Plan 1.	400m straight-line distance <sub>z</sub> are defined on Plan 1.	
POLICY DM31 Paragraph 9.31.2	This policy reflects the NPPF, which identifies the main uses appropriate to a town centre as: retail (including warehouse clubs and factory outlet centres); leisure (such as dance halls), entertainment facilities, intensive sports and recreation facilities such as cinemas, restaurants, bars, night clubs, casinos, health and fitness centres, indoor bowling centres and bingo halls; offices; and arts, culture and tourism including theatres, museums, galleries, concert halls, hotels and conference facilities.	This policy reflects the NPPF, which identifies the main uses appropriate to a town centre as: retail (including warehouse clubs and factory outlet centres); leisure (such as dance halls), entertainment facilities, <b>and</b> intensive sports and recreation facilities such as cinemas, restaurants, bars, night clubs, casinos, health and fitness centres, indoor bowling centres and bingo halls; offices; and arts, culture and tourism including theatres, museums, galleries, concert halls, hotels and conference facilities.	Delete comma and add 'and' to improve grammar and sentence structure
POLICY DM32 Paragraph 9.32.3	Listed below are items which the Council considers to be bulky goods: <ul style="list-style-type: none"> <li>• domestic household electrical;</li> <li>• audio-visual equipment (including radio, TV, Hi-Fi, and computer goods);</li> </ul>	Listed below are items which the Council considers to be bulky goods: <ul style="list-style-type: none"> <li>• domestic household electrical;</li> <li>• audio-visual equipment (including radio, TV, Hi-Fi, and computer goods);</li> </ul>	Change 'builders merchants' to 'building supplies' for consistency with other points in list

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
	<ul style="list-style-type: none"> <li>• furniture, lighting, carpets and floor covering;</li> <li>• hardware and DIY goods;</li> <li>• garden centre goods and garden furniture;</li> <li>• builders merchants;</li> <li>• automotive products and accessories together with associated fitting;</li> <li>• caravans boats and boat equipment;</li> <li>• cycles, cycle products and accessories;</li> <li>• camping equipment;</li> <li>• pets and pet supplies;</li> <li>• furnishing fabrics and curtains; and</li> <li>• blinds and poles.</li> </ul>	<ul style="list-style-type: none"> <li>• furniture, lighting, carpets and floor covering;</li> <li>• hardware and DIY goods;</li> <li>• garden centre goods and garden furniture;</li> <li>• <del>builders merchants</del> <b>building supplies</b>;</li> <li>• automotive products and accessories together with associated fitting;</li> <li>• caravans boats and boat equipment;</li> <li>• cycles, cycle products and accessories;</li> <li>• camping equipment;</li> <li>• pets and pet supplies;</li> <li>• furnishing fabrics and curtains; and</li> <li>• blinds and poles.</li> </ul>	
<p>POLICY DM33</p> <p>Paragraph 9.33.1</p>	<p>The established Employment Areas across the Borough represent very significant clusters of employers providing jobs and therefore need to be safeguarded. The jobs growth target set out in policy CS13 means that protecting against the loss of employment areas</p>	<p>The established Employment Areas across the Borough represent very significant clusters of employers providing jobs and therefore need to be safeguarded. The jobs growth target set out in policy CS13 means that protecting against the loss of <u>E</u>mployment <u>A</u>reas is important.</p>	<p>Capitalise ‘Employment Areas’ for consistency</p>

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	is important. Protecting employment areas for employment use also retains choice of locations across the Borough for businesses to locate in. As consolidated employment areas, operational requirements such as 24 hour working or heavy goods access are also more likely to be capable of being met without adversely affecting the amenity of residential areas. Where compatible with adjacent uses, waste facilities could come forward on land within employment areas.	Protecting <u>E</u> mployment <u>A</u> reas for employment use also retains choice of locations across the Borough for businesses to locate in. As consolidated <u>E</u> mployment <u>A</u> reas, operational requirements such as 24 hour working or heavy goods access are also more likely to be capable of being met without adversely affecting the amenity of residential areas. Where compatible with adjacent uses, waste facilities could come forward on land within <u>E</u> mployment <u>A</u> reas.	
POLICY DM33 Paragraph 9.33.4	Further information on the marketing requirement are set out in appendix 6.	Further information on the marketing requirements are set out in appendix 6.	Change 'requirement' to 'requirements' to improve grammar
POLICY DM33 Paragraph 9.33.7	Appropriate employment-generating sui generis uses referred to in the policy include uses such as car showrooms with accompanying workshops and waste facilities and excludes any sui generis	Appropriate employment-generating sui generis uses referred to in the policy include uses such as car showrooms with accompanying workshops and waste facilities and excludes any sui generis use which includes retail or	Remove underscore

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
	use which includes retail or leisure as anything other than an ancillary use.	<del>leisure</del> as anything other than an ancillary use.	
CHAPTER 10 Paragraph 10.8	The Recreational disturbance Avoidance and Mitigation Strategy (RAMS) referred to in policy CS17 is essential to support planned growth in the Borough, but is not included in table 8A as the measures proposed are not classed as infrastructure.	The Recreational <u>D</u> isturbance Avoidance and Mitigation Strategy (RAMS) referred to in policy CS17 is essential to support planned growth in the Borough, but is not included in table 8A as the measures proposed are not classed as infrastructure.	Capital ‘D’ for ‘Disturbance’
Page 206	Table formatting is off.	Table re-formatted	Try to reformat table on page 205 so that row on page 206 moves up
CHAPTER 11 Objective 2	INDICATOR(S) Net additional homes provided in the monitoring year. Number of affordable homes provided in the monitoring year. Net annual housing and employment land completions Employment rates	INDICATOR(S) Net additional homes provided in the monitoring year. Number of affordable homes provided in the monitoring year. Net annual housing and employment land completions. Employment rates.	Add full stop to point 3 and 4 for consistency

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
CHAPTER 11 Objective 3	Objective 3 title needs to move onto next page.	Objective 3 title moved.	Move objective 3 title onto next page so that it is with its corresponding text
CHAPTER 11 Objective 4	Number of schemes incorporating attenuation and infiltration SUDs.	Number of schemes incorporating attenuation and infiltration <u>Su</u> DS.	Change SUDs to SuDS
CHAPTER 11 Objective 7	INDICATOR(S) Net additional retail floor space in the Central Shopping Area and outside Number of tourism events in the town centre. Visitors to the Regent Theatre and Corn Exchange. Public realm improvements.	INDICATOR(S) Net additional retail floor space in the Central Shopping Area and outside, Number of tourism events in the town centre. Visitors to the Regent Theatre and Corn Exchange. Public realm improvements.	Add full stop to point 1 for consistency
CHAPTER 11 Objective 9	INDICATOR(S) Net change in extent of protected habitat. Recorded condition of designated ecological sites. Habitat mitigation secured. Number of schemes complying with the biodiversity Defra metric	INDICATOR(S) Net change in extent of protected habitat. Recorded condition of designated ecological sites. Habitat mitigation secured. Number of schemes complying with the biodiversity Defra metric,	Add full stop to point 4 for consistency

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
CHAPTER 11 Objective 10	TARGETS To improve educational attainment, health and wellbeing	TARGETS To improve educational attainment, health and wellbeing.	Add full stop for consistency
CHAPTER 11 Objective 11	INDICATOR(S) Unemployment rates. Educational attainment levels. Proportion of the population who live in wards that rank within the most deprived 10% and 25% in the country Reported crime in the Borough	INDICATOR(S) Unemployment rates. Educational attainment levels. Proportion of the population who live in wards that rank within the most deprived 10% and 25% in the country. Reported crime in the Borough.	Add full stop to point 3 and 4 for consistency
APPENDIX 1 Part B: Policy CS6		Indent policy text	Indent policy text for consistency
APPENDIX 1 Part C: Policy DM32	Policy DM32 Retail Proposals Outside Defined Centres	Policy DM32: Retail Proposals Outside Defined Centres	Add colon after policy number for consistency
APPENDIX 2	• Health Facilities including doctors surgeries and dentists;	• Health facilities including doctors surgeries and dentists;	Change 'Facilities' to 'facilities' for consistency

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<b><u>Title/ Section</u></b>	<b><u>Submission Wording (Reg 22)</u></b>	<b><u>Requested Post-Submission Wording</u></b>	<b><u>Reason</u></b>
APPENDIX 5  Area of Archaeological Importance	Within the local plan context, it is intended to alert applicants and planning officers to the likely requirements for archaeological investigation, protection and recording to be placed on development, on potentially even the smallest scale below-ground works.	Within the <u>L</u> ocal <u>P</u> lan context, it is intended to alert applicants and planning officers to the likely requirements for archaeological investigation, protection and recording to be placed on development, on potentially even the smallest scale below-ground works.	Capitalise ‘Local Plan’ for consistency
APPENDIX 5  Air Quality Management Areas		Move title in line with text	Move title in line with text for clarity and consistency
APPENDIX 5  European Sites	This includes Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 (as amended).	This includes Special Areas of Conservation, Sites of Community Importance, <del>Special Areas of Conservation</del> and Special Protection Areas, and is defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 (as amended).	Remove repetition of ‘Special Areas of Conservation’

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
APPENDIX 5 ADD NEW DEFINITION FRA Flood Risk Assessment		A site-specific flood risk assessment is carried out by (or on behalf of) a developer to assess the flood risk to and from a development site.	To explain an abbreviation used in the Local Plan. The wording is that used in the Planning Practice Guidance.
APPENDIX 5  Gypsies and Travellers	In determining whether persons are ‘gypsies and travellers’ for the purposes of policy CS11, consideration should be given to the following issues amongst other relevant matters: a) whether they previously led a nomadic habit of life b) the reasons for ceasing their nomadic habit of life c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.	In determining whether persons are ‘gypsies and travellers’ for the purposes of policy CS11, consideration should be given to the following issues amongst other relevant matters: a) whether they previously led a nomadic habit of life, b) the reasons for ceasing their nomadic habit of life, <b>and</b> c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.	Add commas and ‘and’ to improve grammar
APPENDIX 5  Open space, sport, and recreational facilities		Re-format table	Reformat table to ensure that end of ‘recreational’ is not cut off

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
APPENDIX 5  Objectively Assessed Need		Move title in line with text	Move title in line with text for clarity and consistency
APPENDIX 5  Planning Policy Statement	These have replaced by the NPPF.	These have <u>been</u> replaced by the NPPF.	Add 'been' to improve grammar
APPENDIX 5  Policies Map	An obligatory component of a local plan showing the location of proposals in the plan on an Ordnance Survey base map for new development plan documents.	An obligatory component of a <u>L</u> ocal <u>P</u> lan showing the location of proposals in the plan on an Ordnance Survey base map for new development plan documents.	Capitalise 'Local Plan' for consistency
APPENDIX 5  Primary Zone	The Primary zone is a group of shops within the Primary Shopping Area which collectively form the core of the Central Shopping Area.	The Primary <u>Z</u> one is a group of shops within the Primary Shopping Area which collectively form the core of the Central Shopping Area.	Capitalise 'Zone' for consistency
APPENDIX 5  Proposals Map	An obligatory component of a local plan showing the location of proposals in the plan on an Ordnance Survey base map.	An obligatory component of a <u>L</u> ocal <u>P</u> lan showing the location of proposals in the plan on an Ordnance Survey base map.	Capitalise 'Local Plan' for consistency

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<b><u>Title/ Section</u></b>	<b><u>Submission Wording (Reg 22)</u></b>	<b><u>Requested Post-Submission Wording</u></b>	<b><u>Reason</u></b>
APPENDIX 5 Regeneration	Renewal, rehabilitation of former derelict or under used sites.	Renewal, / rehabilitation of former derelict or under used sites.	Change comma to forward slash to improve grammar
APPENDIX 5 Secondary Zone	Secondary zones are groups of shops within a defined shopping centre (e.g. the Central Shopping Area) where there is more opportunity for a diversity of uses than in the primary zone.	Secondary <b>Z</b> ones are groups of shops within a defined shopping centre (e.g. the Central Shopping Area) where there is more opportunity for a diversity of uses than in the <b>P</b> rietary <b>Z</b> one.	Capitalise 'Secondary Zones' and 'Primary Zone' for consistency
APPENDIX 5 Specialist Zone	Specialist zones are groups of shops within a defined shopping centre (e.g. where there is the greatest diversity of uses, particularly including food and drink uses, alongside clusters of specialist retailers).	Specialist <b>Z</b> ones are groups of shops within a defined shopping centre (e.g. where there is the greatest diversity of uses, particularly including food and drink uses, alongside clusters of specialist retailers).	Capitalise 'Specialist Zones' for consistency
APPENDIX 5 ADD NEW DEFINITION SFRA Strategic Flood Risk Assessment		A Strategic Flood Risk Assessment is a study carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future.	To explain an abbreviation used in the Local Plan. The wording is that used in the Planning Practice Guidance.

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<b><u>Title/ Section</u></b>	<b><u>Submission Wording (Reg 22)</u></b>	<b><u>Requested Post-Submission Wording</u></b>	<b><u>Reason</u></b>
APPENDIX 5 Supplementary Planning Document	A local development document that provides further detail of policies in the development plan documents or of saved local plan policies.	A local development document that provides further detail of policies in the development plan documents or of saved <u>L</u> ocal <u>P</u> lan policies.	Capitalise 'Local Plan' for consistency
APPENDIX 5 Supplementary Planning Guidance	Providing additional guidance expanding policies in a local plan.	Providing additional guidance expanding policies in a <u>L</u> ocal <u>P</u> lan.	Capitalise 'Local Plan' for consistency
APPENDIX 5 Travel Plans		Move title in line with text	Move title in line with text for clarity and consistency
APPENDIX 5 Urban Fringe			Move title and text down so there is a space between previous text
APPENDIX 6 Paragraph 1.3	This Strategy form a part of the Draft Ipswich Local Plan Review 2018 and is cross-referenced in polices DM24 (Protection and Provision of Community Facilities), DM29 (District and Local Centres) and DM33 (Protection of Employment Land).	This Strategy form <u>s</u> a part of the Draft Ipswich Local Plan Review 2018 and is cross-referenced in polices DM24 (Protection and Provision of Community Facilities), DM29 (District and Local Centres) and DM33 (Protection of Employment Land).	Change 'form' to 'forms' to improve grammar

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<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
APPENDIX 6  Paragraph 2.		Indent title in line with text	Indent title in line with text above
APPENDIX 6  Paragraph 2.1	2.1 Developers are advised to discuss marketing arrangements prior to advertising, to ensure there is a clear strategy and that it meets Council expectations and avoids delays in the planning process (e.g. having to repeat the process).	2.1 -Developers are advised to discuss marketing arrangements prior to advertising, to ensure there is a clear strategy and that it meets Council expectations and avoids delays in the planning process (e.g. having to repeat the process).	Delete space between numbering and beginning of paragraph
Plan 2: Flood Risk	This plan of nationally designated flood zones relates to fluvial flooding.	This plan of nationally designated flood zones relates to fluvial <b><u>and tidal</u></b> flooding <b><u>and is based indicatively on mapped data from the Environment Agency.</u></b>	For accuracy.
Plan 5: Ecological Network	The Plan 5 refers to Ipswich Wildlife Audit 2012-13	Ranks refer to the Ipswich Wildlife Audit <del>2012-13</del> <b><u>2019</u></b>	In response to Representation 26327 (Suffolk Wildlife Trust).

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**Site Allocations DPD**

<b><u>Title/ Section</u></b>	<b><u>Final Draft Wording (Reg 19)</u></b>	<b><u>Submission Wording (Reg 22)</u></b>	<b><u>Reason</u></b>
CHAPTER 1: Introduction  Paragraph 1.3	Firstly it identifies a wide range of sites across the whole Borough, which should be allocated for development or afforded a degree of protection from development (Chapter 4). Secondly it sets out policies for town centre uses such as retail and leisure (Chapter 5). Finally it provides development guidelines for six opportunity areas within IP-One where significant development and public realm improvements are anticipated (Chapter 6).	Firstly, it identifies a wide range of sites across the whole Borough, which should be allocated for development or afforded a degree of protection from development (Chapter 4). Secondly, it sets out policies for town centre uses such as retail and leisure (Chapter 5). Finally, it provides development guidelines for six opportunity areas within IP-One where significant development and public realm improvements are anticipated (Chapter 6).	Add commas to improve grammar
CHAPTER 1: Introduction  Paragraph 1.7	“This document is an formal draft...”	This document is a formal draft...”	Grammar.
CHAPTER 2: The Ipswich Local Plan  Paragraph 2.8	“Thus a body of evidence underpins the Final Draft Core Strategy and...”	“Thus a body of evidence underpins the Final Draft Core Strategy -and...”	Extra space between words deleted

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
CHAPTER 3 Paragraph 3.2	Objective 2 At least (a) 8,010 new dwellings....	Objective 2: At least (a) 8,010 new dwellings....	Add colon after all objective numbers in list to improve grammar
CHAPTER 3 Paragraph 3.2: Objective 10	To retain and provide high quality and sustainable education, health and sports facilities and other key element of community infrastructure to meet local demand.	To retain and provide high quality and sustainable education, health and sports facilities and other key elements of community infrastructure to meet local demand.	Make 'element' plural to improve grammar
POLICY SP2: IP011a	"Lower Orwell Street former Gym & Trim (formerly..."	"Lower Orwell Street former Gym & Trim (formerly..."	Extra space between words deleted
POLICY SP2: IP047	"...enhanced river path, Based on pending application (19/00148/OUT)"	"...enhanced river path, <b>(b</b> ased on pending application (19/00148/OUT))."	Lower case B, extra space between words deleted, comma deleted, opening and closing brackets added, full stop added.
POLICY SP2 IP048b	"90dph (DM23a lower..."	90dph (DM23a -lower..."	Extra space between words deleted.
POLICY SP2 IP133	120dph (DM23Based on 10/00418/VC for 47 dwellings expired Feb 2014 & preapplication discussion)	120dph (DM23 Based on 10/00418/VC for 47 dwellings expired Feb 2014 & preapplication discussion)	Add space between 'DM23' and 'Based'
POLICY SP2 IP172	DM23110dph	DM23 110dph	Add space between 'DM23' and '110dph'

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
POLICY SP2 IP172	“. Planning permission for student accommo-dation lapsed and unlikely to proceed (08/00511/FUL)”	“-Planning permission for student <del>accommo-dation</del> <u>accommodation</u> lapsed and unlikely to proceed (08/00511/FUL).”	Random full stop removed, hyphen removed from word and full stop added.
POLICY SP2 IP279B(1)	“Based on master planning work with IP279A”	“Based on master planning work with IP279A.”	Full stop added.
POLICY SP2 IP279B(1)	“Based on master planning work with IP279A”	“Based on master planning work with IP279A.”	Full stop added.
POLICY SP2 IP309	“(Higher end based on proximity to local centre)_”	“(Higher end based on proximity to local centre).”	Random underscore symbol removed and full stop added.
POLICY SP2 IP354	“70dph (Less than 90dph due to site constraints)”	“70dph (Less than 90dph due to site constraints).”	Full stop added.
POLICY SP2 IP355	“100dph (based on location in Portman Quarter)”	“100dph (based on location in Portman Quarter).”	Full stop added.
POLICY SP3 Table 2	“Capa-city”	“ <del>Capa-city</del> <u>Capacity</u> ”	Hyphen removed.
POLICY SP3 IP200	“...Previous pps: 11/00507/FUL approved 01.09.2011 (132 flats) 05/00819/FUL..”	“...Previous pps: 11/00507/FUL approved 01.09.2011 (132 flats)- 05/00819/FUL.”	Extra space deleted.

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
POLICY SP3 IP205	"...Application 19/00624/FP13 on part of site for 14 self-contained flats)	"...(Application 19/00624/FP13 on part of site for 14 self-contained flats)."	Opening bracket added and full stop added.
POLICY SP3 IP206	"...16/00092/VC (replaced 16 of the flats with 43 (29 studios + 14 one-beds))"	"...16/00092/VC (replaced 16 of the flats with 43 (29 studios + 14 one-beds))."	Full stop added.
POLICY SP3 IP211	"...05/00296/FUL added 25 extra units. 150 (at winerack) and 6 at 16/00346/FUL"	"...05/00296/FUL added 25 extra units. 150 (at winerack) and 6 at 16/00346/FUL."	Spacing between sentences deleted and full stop added.
POLICY SP5 Table 3	"28.34.ha"	"28.34-ha"	Delete extra full stop after 34.
POLICY SP5 Paragraphs 4.22 and 4.23		Paragraph numbering updated.	Starting from page 39, paragraph numbering will need to be adjusted to account for repeat of numbers 4.22 and 4.23
POLICY SP5 Paragraph 4.24	All the employment sites allocated through the adopted Local Plan 2017 have been reviewed and only those included where the Council is confident development can be delivered over the plan period and, in the vast majority of cases, where the Employment Land	All the employment sites allocated through the adopted Local Plan 2017 have been reviewed and only <del>those</del> included where the Council is confident development can be delivered over the plan period and, in the vast majority of cases, where the Employment Land	Remove 'those' to improve grammar

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
	Supply Assessment 2018 concludes that the sites are of good quality.	Supply Assessment 2018 concludes that the sites are of good quality.	
POLICY SP5  Paragraph 4.25	The Suffolk Growth Strategy and the New Anglia Local Enterprise Partnership's (NALEP) Economic Strategy for Norfolk and Suffolk 2017 identify the economic sectors which are already significant in Suffolk (and Norfolk) and those which are forecast to grow5 : energy, advanced manufacturing and engineering, information and communication technology (ICT), tech and digital creative, financial services and insurance, advanced agriculture food and drink, transport freight and logistics, visitor economy - tourism and culture, life sciences and biotech and construction and development.	The Suffolk Growth Strategy and the New Anglia Local Enterprise Partnership's (NALEP) Economic Strategy for Norfolk and Suffolk 2017 identify the economic sectors which are already significant in Suffolk (and Norfolk) and those which are forecast to grow5 : energy, advanced manufacturing and engineering, information and communication technology (ICT), tech and digital creative, financial services and insurance, advanced agriculture, food and drink, transport, freight and logistics, visitor economy - tourism and culture, life sciences and biotech, and construction and development.	Add commas to improve grammar
POLICY SP6  IP029	"...Bramford Rd"	"...Bramford <u>Road</u> "	Grammar
POLICY SP6  IP032	"...Old Norwich Rd"	"...Old Norwich <u>Road</u> "	Grammar
POLICY SP6	"...Bramford Rd"	"...Bramford <u>Road</u> "	Grammar

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
IP033			
POLICY SP6 IP037	"70% housing, 5% existing..."	"70% housing, 5% -existing..."	Extra space deleted.
POLICY SP6 4.28	"On some sites there is a requirement to provide more than the standard amount of open space. This..."	"On some sites there is a requirement to provide more than the standard amount of open space. -This..."	Extra space deleted.
POLICY SP6 4.31	"This is addressed through the policy by allocating land for this use at site IP047 and within the Island Site redevelopment. Appendix 3..."	"This is addressed through the policy by allocating land for this use at site IP047 and within the Island Site redevelopment. -Appendix 3..."	Extra space deleted.
POLICY SP7 Policy description	"...stand alone..."	"... <del>stand alone</del> <b>standalone</b> ..."	Grammar
POLICY SP7 IP005	"...Old Norwich Rd"	"...Old Norwich <u>Road</u> "	Grammar
POLICY SP7 IP010a	"...Felixstowe Rd"	"...Felixstowe <u>Road</u> "	Grammar
POLICY SP9	The park and ride site at Anglia Parkway is safeguarded for future re- use for park and ride.	The park and ride site at Anglia Parkway is safeguarded for future re-use for park and ride.	Remove space between dash and 'use'
POLICY SP9	The River Strategy identifies the aim of providing a river crossing between	The River Strategy identifies the aim of providing a river crossing between	Add 'Road' for accuracy

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
Paragraph 4.41	Hadleigh Road and Boss Hall for pedestrians and cyclists.	Hadleigh Road and Boss Hall <b>Road</b> for pedestrians and cyclists.	
CHAPTER 5 Paragraph 5.4	<ul style="list-style-type: none"> <li>• More people living and working in the town centre</li> </ul>	<ul style="list-style-type: none"> <li>• More people living and working in the town centre;</li> </ul>	Add semi-colon after each bullet point in list for consistency
CHAPTER 5 Paragraph 5.8	Grade I and II* buildings in Ipswich are dealt with through the national Heritage at Risk register.	Grade I and II* <b>listed</b> buildings in Ipswich are dealt with through the national Heritage at Risk register.	Add 'listed' for clarity
POLICY SP10	The former British Homes Stores, Butter Market, is safeguarded to include some future A1 retail provision.	The former British Homes Stores, Butter Market, is safeguarded to include some future A1 retail provision.	Change to 'British <b>Home</b> Stores' for accuracy
POLICY SP11 Paragraph 5.20	The Waterfront extends further south than the town centre but the two areas overlap at the northern quays. Within the Waterfront, office, arts, culture open space, boat-related and tourism uses are considered appropriate in order to support the delivery of a mixed use area, to provide some flexibility to support its continued regeneration and because the accessibility of the Waterfront is good.	The Waterfront extends further south than the town centre but the two areas overlap at the northern quays. Within the Waterfront, office, arts, culture, open space, boat-related and tourism uses are considered appropriate in order to support the delivery of a mixed-use area, to provide some flexibility to support its continued regeneration and because the accessibility of the Waterfront is good.	Add comma or clarity
POLICY SP15 Paragraph 5.33	<ul style="list-style-type: none"> <li>• The provision of new foot and cycle bridges across the new Cut linking Stoke Quay to St Peter's Wharf and the Island site to Felaw Street;</li> </ul>	<ul style="list-style-type: none"> <li>• The provision of new foot and cycle bridges across the <b>New</b> Cut linking Stoke Quay to St Peter's Wharf and the Island site to Felaw Street;</li> </ul>	Capitalise 'New' for accuracy

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
POLICY SP15 Paragraph 5.37	Currently the route is obstructed in the vicinity of Boss Hall to cyclists and people with reduced mobility by a structure formerly needed for the operation of a sluice gate. Opportunities will be sought to secure its removal.	Currently the route is obstructed in the vicinity of Boss Hall <b>Road</b> to cyclists and people with reduced mobility by a structure formerly needed for the operation of a sluice gate. Opportunities will be sought to secure its removal.	Add ‘Road’ for accuracy
POLICY SP16 5.40	“...Through the Final Draft Core Strategy policy CS20, the Council has identified that this...”	“...Through the Final Draft Core Strategy policy CS20, the Council has identified that this...”	Extra space deleted.
POLICY SP16 5.41	“...bridge A vehicular link between the east and west banks; bridge B a pedestrian and cycle bridge across the lock gates; and bridge C a vehicular link...”	“...bridge A <sub>2</sub> a vehicular link between the east and west banks; bridge B <sub>2</sub> a pedestrian and cycle bridge across the lock gates; and bridge C <sub>2</sub> a vehicular link...”	Commas added for clarity.
POLICY SP17 5.47	The provision of public car parking provision within central Ipswich has been reviewed through a parking study, which will inform the preparation of an Ipswich Parking Strategy.	<del>The provision of</del> Public car parking provision within central Ipswich has been reviewed through a parking study, which will inform the preparation of an Ipswich Parking Strategy.	Remove ‘the provision of’ at beginning of sentence to avoid repetition
POLICY SP17 5.50	“The emerging findings from the parking strategy (which does not differentiate future demand in terms of long or short stay) suggest a net deficit of spaces by 2036 in central Ipswich of fewer than ten spaces. Geographically,	“The emerging findings from the parking strategy (which does not differentiate future demand in terms of long or short stay) suggest a- net deficit of spaces by 2036 in central Ipswich of fewer than ten spaces. Geographically, the areas of	Extra space deleted and grammar error.

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
	the areas of deficit are in the vicinity of the railway station and office quarter around Russell Road, the Waterfront and in the north of the town centre. The Council is preparing a Ipswich Area Parking Plan..."	deficit are in the vicinity of the railway station and office quarter around Russell Road, the Waterfront and in the north of the town centre. The Council is preparing <u>an</u> Ipswich Area Parking Plan..."	
PART C Opportunity Area A (page 73)	<ul style="list-style-type: none"> <li>• Development to take account of heritage issues including archaeology and Wet Dock Conservation Area.</li> <li>• Ensure suitable public transport provision</li> </ul>	<ul style="list-style-type: none"> <li>• Development to take account of heritage issues including archaeology and Wet Dock Conservation Area-</li> <li>• Ensure suitable public transport provision</li> </ul>	Remove full stop after 'Area'
PART C Opportunity Area C	Development of the main Mint Quarter area should be based around a continuation of the historic urban block structure, with a new pedestrian spine forming a continuation of Butter Market linking through to a new urban square located on the historic north-south route of Cox Lane.	Development of the main Mint Quarter area should be based around a continuation of the historic urban block structure, with a new pedestrian spine forming a continuation of <u>the</u> Butter Market linking through to a new urban square located on the historic north-south route of Cox Lane.	Add 'the' to improve grammar
PART C Opportunity Area C	Ancillary routes should link through to the main routes enclosing the wider block and to acknowledge historic routes and features as appropriate. Residential accommodation should be provided at	Ancillary routes should link through to the main routes enclosing the wider block and <del>to</del> acknowledge historic routes and features as appropriate. Residential accommodation should be provided at	Remove 'to' and add 'level' to improve grammar

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	upper floors to provide an appropriate form and scale of development.	upper floors <u>level</u> to provide an appropriate form and scale of development.	
PART C Opportunity Area C	<ul style="list-style-type: none"> <li>• Pedestrian connection opposite Butter Market with new urban space</li> </ul>	<ul style="list-style-type: none"> <li>• Pedestrian connection opposite <u>the</u> Butter Market with new urban space</li> </ul>	Add ‘the’ to improve grammar
PART C Opportunity Area C			Add full stop to all bullet points in table for consistency
PART C Opportunity Area C	“...Some retail...”	“...Some -retail...”	Extra space deleted.
PART C Opportunity Area E	The barrier to pedestrian movement formed by Civic Drive and the series of underpasses beneath the St Matthew’s Street roundabout would be addressed by new surface level crossings as has been done at the Friars Street Princes Street end of Civic Drive as part of the Travel Ipswich scheme.	The barrier to pedestrian movement formed by Civic Drive and the series of underpasses beneath the St Matthew’s Street roundabout would be addressed by new surface level crossings as has been done at the Friars Street/Princes Street end of Civic Drive as part of the Travel Ipswich scheme.	Add forward slash to improve grammar
PART C Opportunity Area E		Full stops added to all bullet points.	Add full stop to all bullet points in table for consistency

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PART C Opportunity Area F	The riverside area is low lying and formed a fertile, grassy edge to the main settlement area since early times.	The riverside area is low lying and <b>has</b> formed a fertile, grassy edge to the main settlement area since early times.	Add ‘has’ to improve grammar
PART C Opportunity Area G	Redevelopment of the Portman Walk industrial site for residential purposes will provide an enhanced environmental quality and encourage provision of a new pedestrian / cycle access through to Handford Road, aiding accessibility for both existing and new residents.	Redevelopment of the Portman Walk industrial site for residential purposes will provide an enhanced environmental quality and encourage provision of a new pedestrian / cycle access through to Handford Road, aiding accessibility for both existing and new residents.	Remove ‘a’ to improve grammar
PART C Opportunity Area G	<ul style="list-style-type: none"> <li>• Cycle and pedestrian connections created where possible across the river and canal;</li> </ul>	<ul style="list-style-type: none"> <li>• Cycle and pedestrian connections created where possible across the river and canal;</li> </ul>	Change semi-colon to full stop for consistency
PART C Opportunity Area H		Full stops added to all bullet points.	Add full stop to all bullet points in table for consistency
PART C Opportunity Area E	“...major investment. Existing developments...”	“...major investment. –Existing developments...”	Extra spaces deleted.
PART C Opportunity Area E	“and the New Wolsey theatre, northwards to Ipswich Museum on High St and...”	“and the New Wolsey theatre, northwards to Ipswich Museum on High <b>Street</b> and...”	Extra spaces deleted and name corrected.
PART C Opportunity Area H	“The first phases of regeneration...”	“The first phases of -regeneration...”	Extra space deleted.

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
CHAPTER 7 Paragraph 7.1	A key element of the Local Plan is the need to set out clear mechanism and targets for delivery.	A key element of the Local Plan is the need to set out clear mechanisms and targets for delivery.	Change 'mechanism' to 'mechanisms'
APPENDIX 3 Page 107	Please note that development is required to take into account appropriate the constraints identified through the site sheets.	Please note that development is required to take into account appropriately the constraints identified through the site sheets.	Change 'appropriate' to 'appropriately' or remove
APPENDIX 3 Page 107: IP005	Surface water flooding local to site	Surface water flooding local to site.	Add full stop to point at end of list
APPENDIX 3 IP150a Page: 109	Ravenswood S & T (adjacent Fen Bight Circle)	Ravenswood <del>S &amp; T</del> <b>U, V, W</b> (adjacent Fen Bight Circle)	Correct site name.
APPENDIX 3 IP169	"...planning consent. Archaeological monitoring of groundworks is likely to be appropriate."	"...planning consent. –Archaeological monitoring of groundworks is likely to be appropriate."	Extra spaces deleted.
APPENDIX 3 IP200	"...close to Medieval sites (IPS 145, IPS 294).No objection..."	"...close to Medieval sites (IPS 145, IPS 294). No objection..."	Space added.
APPENDIX 3 Page 107: IP214	The site is in the Central Conservation Area and an Air Quality Management.	The site is in the Central Conservation Area and an Air Quality Management <b>Area</b> .	Add 'Area' for accuracy
APPENDIX 4 IPO28b	Stratigraphy may be expected to be particularly deep in former streams and watercourses, and waterlogged features	Stratigraphy may be expected to be particularly deep in former streams and watercourses, and waterlogged features	Remove 'are' to improve grammar

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	are recorded in the Urban Archaeological Database.	<del>are</del> recorded in the Urban Archaeological Database.	
APPENDIX 4 IP028b	Given the nature of this site, an invasive plant species assessment should be included part of any Preliminary Ecological Assessment to accompany a planning application.	Given the nature of this site, an invasive plant species assessment should be included <u>as</u> part of any Preliminary Ecological Assessment to accompany a planning application.	Add 'as' to improve grammar
APPENDIX 4 IP045	This allocation site is therefore in a sensitive historic environment which requires careful attention when developing a proposal for the redevelopment of this site, considering the impact on the introduction of development within the setting of these heritage assets, as well as considering views into and out of adjacent Conservation Areas.	This allocation site is therefore in a sensitive historic environment which requires careful attention when developing a proposal for the redevelopment of this site, considering the impact <del>on</del> <u>of</u> the introduction of development within the setting of these heritage assets, as well as considering views into and out of adjacent Conservation Areas.	Change 'on' to 'of' to improve grammar
APPENDIX 4 IP045	The use of masonry utilising textured and polychromatic brick bonds would in the redevelopment of this allocation site would allow for the site to be distinctive whilst also relating to the existing development to the north.	The use of masonry utilising textured and polychromatic brick bonds would in the redevelopment of this allocation site <del>would</del> allow for the site to be distinctive whilst also relating to the existing development to the north.	Remove 'would' to improve grammar
APPENDIX 4 IP045	As this site is located close to Holywells Park CWS and is east of the River Orwell CWS, there is an opportunity to create	As this site is located close to Holywells Park CWS and is east of the River Orwell CWS, there is an opportunity to create	Add space between 'small' and 'scale'

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
	smallscale steppingstone habitats which will in turn contribute to the wider ecological network.	small_scale steppingstone habitats which will in turn contribute to the wider ecological network.	
APPENDIX 4 IP052	The building line could be set back from Star Lane, or provide a staggered frontage so as not to not create a tunnelling effect, particularly to the south west of the side adjacent to Premier Inn.	The building line could be set back from Star Lane, or provide a staggered frontage so as not to <del>not</del> create a tunnelling effect, particularly to the south west of the side adjacent to Premier Inn.	Remove 'not' to improve grammar
APPENDIX 4 IP226	Potential contamination land and a contaminated land assessment is required	Potential contamination land and a contaminated land assessment is required.	Add full stop to end of sentence

**Site Sheets**

<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
IP003	"...biodiversity enhancement are appropriate. . Footpath 44..."	"...biodiversity enhancement are appropriate.– Footpath 44..."	Extra full stop deleted.
IP003	The site may have wildlife interest an ecological, bat and reptile survey will be needed.	The site may have wildlife interest _an ecological, bat and reptile survey will be needed.	Add dash to improve grammar
IP010a	"An ecological survey (including flora, reptiles, bats and badgers) will..."	"An ecological survey (including flora, reptiles, bats and badgers) -will..."	Extra space deleted.

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
IP010a	Existing dwelling houses in California are principally red brick terraces and pairs of semi-detached houses, with often a prevailing architectural feature which characterises a particular road or area, such as the position of the front door, the pattern of fenestration, the use of bay windows, which has led to some distinctive areas of development.	Existing dwelling houses in California are principally red brick terraces and pairs of semi-detached houses, with often a prevailing architectural feature which characterises a particular road or area, such as the position of the front door, the pattern of fenestration, <u>or</u> the use of bay windows, which has led to some distinctive areas of development.	Change comma to 'or' to improve grammar
IP010b	Existing dwelling houses in California are principally red brick terraces and pairs of semi-detached houses, with often a prevailing architectural feature which characterises a particular road or area, such as the position of the front door, the pattern of fenestration, the use of bay windows, which has led to some distinctive areas of development.	Existing dwelling houses in California are principally red brick terraces and pairs of semi-detached houses, with often a prevailing architectural feature which characterises a particular road or area, such as the position of the front door, the pattern of fenestration, <u>or</u> the use of bay windows, which has led to some distinctive areas of development.	Change comma to 'or' to improve grammar
IP011b	"...unless other means fo biodiversity enhancement..."	"...unless other means <del>fo</del> <u>of</u> biodiversity enhancement..."	Grammar
IP011b	Where development is accepted in principle archaeological remains will be complex, important and mitigation could involve significant costs and timescales.	Where development is accepted in principle archaeological remains will be complex <u>and</u> important, and mitigation could involve significant costs and timescales.	Add 'and' and comma to improve grammar

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IP011c	“...There is also limited potential for nationally important...”	“...There is also limited potential -for nationally important...”	Extra space deleted.
IP012	Although this site is currently of low wildlife value some of the buildings in the could support bats and consequently further surveys are recommended.	Although this site is currently of low wildlife value some of the buildings <del>in</del> <del>the</del> could support bats and consequently further surveys are recommended.	Remove ‘in the’ to improve grammar
IP015	The nature of the scale, massing, design and appearance a multi-storey car park is a key consideration regarding this allocation, with multi storey car parks typically being a single volume building, with the potential to be a particularly tall building	The nature of the scale, massing, design and appearance <b>of</b> a multi-storey car park is a key consideration regarding this allocation, with multi storey car parks typically being a single volume building, with the potential to be a particularly tall building	Add ‘of’ to improve grammar
IP015	The design of the residential accommodation should have active and engaging frontages to West End Road and views across the river, whilst also create a positive architectural statement which will act as a landmark development signalling the entrance to Ipswich.	The design of the residential accommodation should have active and engaging frontages to West End Road and views across the river, whilst also <del>create</del> <b>creating</b> a positive architectural statement which will act as a landmark development signalling the entrance to Ipswich.	Change ‘create’ to ‘creating’ to improve grammar
IP029	“The site has potential wildlife interest Design and layout...”	“The site has potential wildlife interest, Design and layout...”	Full stop added.
IP029	Bridleway links are required at the route’s northern end to a) connect to	Bridleway links are required at: <b>a)</b> the route’s northern end to connect to the	Change sentence structure to improve grammar

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
	the urban footpath leading to Morgan Drive; and b) eastwards to link to Bramford Lane.	urban footpath leading to Morgan Drive; and b) eastwards to link to Bramford Lane.	
IP029	A contemporary approach to design utilising distinctive roofs forms would be encouraged, with development proposals taking design cues from adjacent architecture, particularly with regard to the unusual and contrasting roof forms which characterise this western end of Bramford Road.	A contemporary approach to design utilising distinctive roofs forms would be encouraged, with development proposals taking design cues from adjacent architecture, particularly with regard to the unusual and contrasting roof forms which characterise this western end of Bramford Road.	Changes 'roofs' to 'roof' to improve grammar
IP031b	"DM23Adopted Plan 2017"	<del>"DM23</del> Adopted Plan 2017"	Delete random word.
IP031b	"18 (100dph(reflective..."	"18 (100dph_(reflective..."	Space added.
IP037	"It is close to an AQMA, is in flood zones 2 and 3, and close to the Orwell Estuary Special Protection Area. The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.."	"It is close to an AQMA, is in flood zones 2 and 3, and close to the Orwell Estuary Special Protection Area. -The site is in close proximity to the Stour and Orwell SPA/ Ramsar site. Information to inform a project level HRA will be required to demonstrate that urbanisation impacts on the site are prevented.."	Extra spaces and full stop deleted.
IP040	The residential element of the development should be designed and located so as not to be adversely affected by noise from the Wolsey Theatre.	The residential element of the development should be designed and located so as not to be adversely affected by noise from the <b>New</b> Wolsey Theatre.	Change to 'New Wolsey Theatre' for accuracy

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IP041	Residential development should be designed so as not to be adversely affected by noise from the Wolsey Theatre.	Residential development should be designed so as not to be adversely affected by noise from the <b>New</b> Wolsey Theatre.	Change to 'New Wolsey Theatre' for accuracy
IP041	The site is adjacent to the Central Conservation Area and the Burlington Road Conservation Area lies a little further away to the west. grade II* St Matthews Church also lies to the west.	The site is adjacent to the Central Conservation Area and the Burlington Road Conservation Area lies a little further away to the west. <b>G</b> rade II* St Matthews Church also lies to the west.	Capital letter at start of sentence to improve grammar
IP043	There is outstanding post-excavation work under IP/11/00267} and further work would be needed across the site.	There is outstanding post-excavation work under IP/11/00267] and further work would be needed across the site.	Remove strikethrough from bracket
IP047	"Development must take account of the River Corridor Buffer (10m) where no development should take place, wherever practicable."	"Development must take account of the River Corridor Buffer (10m) where no development should take place, <del>wherever</del> <b>wherever</b> practicable."	Grammar
IP049	"Development must take account of the River Corridor Buffer (10m) where no development should take place, wherever practicable."	"Development must take account of the River Corridor Buffer (10m) where no development should take place, <del>wherever</del> <b>wherever</b> practicable."	Grammar
IP054b	Whilst much of this area is not located in the Conservation Area, the allocation site nonetheless is located in the setting of the Central Conservation Area, responds to several historic ranges and	Whilst much of this area is not located in the Conservation Area, the allocation site nonetheless is located in the setting of the Central Conservation Area, responds to several historic ranges and	Add 'is' to improve sentence flow

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
	outbuildings along St Peters Street, and located on land of archaeological significance.	outbuildings along St Peters Street, and <b>is</b> located on land of archaeological significance.	
IP054b	The winding nature of Turret Lane should be incorporated into development proposals, and should reveal the design of the scheme as users turn the corner of Turret Lane, and be of a high quality design which would help link the town centre and the waterfront.	The winding nature of Turret Lane should be incorporated into development proposals, <del>and</del> should reveal the design of the scheme as users turn the corner of Turret Lane, and be of a high quality design which would help link the town centre and the waterfront.	Remove 'and' to improve grammar
IP064a	The relationship with the safeguarded facility would need to be considered as part of the masterplanning and design of the allocation.	The relationship with the –safeguarded facility would need to be considered as part of the masterplanning and design of the allocation.	Remove spaces before 'safeguarded'
IP064a	As the site is located adjacent to Holywells Park CWS the eastern boundary should be buffered from any development.	As the site is located adjacent to Holywells Park CWS, the eastern boundary should be buffered from any development.	Add comma after CWS
IP066	Any greenspace provision should be located at the north-eastern end of the site as this is closest the area of offsite, private seminatural habitat.	Any greenspace provision should be located at the north-eastern end of the site as this is <b>the closest</b> area of offsite, private seminatural habitat.	Swap 'closest' and 'the' to improve sentence structure
IP066	This allocation site comprises 20th century warehousing located to the east of the town centre, and bounded by	This allocation site comprises 20th century warehousing located to the east of the town centre, and <b>is</b> bounded by	Add 'is' to improve grammar

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
	dense, mature vegetation to the east, historically associated with Uplands Gate, a large listed dwelling house on Bishop’s Hill.	dense, mature vegetation to the east, historically associated with Uplands Gate, a large listed dwelling house on Bishop’s Hill.	
IP080	The relationship with the safeguarded facility would need to be considered as part of the masterplanning and design of the allocation.	The relationship with the –safeguarded facility would need to be considered as part of the masterplanning and design of the allocation.	Remove spaces before ‘safeguarded’
IP083	“There is presently a piece a public art, The Navigator, which occupies the western section of the site, which would need to retained or moved...”	“There is presently a piece a public art, The Navigator, which occupies the western section of the site, which would need to <b>be</b> retained or moved...”	Grammar
IP089	Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required Assessment-and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work).	Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required Assessment_and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work).	Remove hyphen between ‘assessment’ and ‘and’
IP089	Owing to the setback position of 11 Fore Street, and that the land to the east of this building has historically been undeveloped and used as the garden to the listed building, development around to the rear of this	Owing to the setback position of 11 Fore Street, and <b>the fact</b> that the land to the east of this building has historically been undeveloped and used as the garden to the listed building, development around to the rear of this building requires	Add ‘the fact’ to improve sentence structure

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
	building requires particular attention, and should provide a respectable buffer to allow for breathing room between new development and the listed building.	particular attention, and should provide a respectable buffer to allow for breathing room between new development and the listed building.	
IP096	“Archaeological remains may be complex and-important and mitigation...”	“Archaeological remains may be complex and important and mitigation...”	Hyphen deleted.
IP096	The trees along the southern boundary should be assessed for their potential to support bat roost.	The trees along the southern boundary should be assessed for their potential to support bat roosts.	Change ‘roost’ to ‘roosts’ to improve grammar
IP119	Development in this location should seek to enable greater recreational, leisure and sports use of the River Gipping, for example though the provision of 'portage' easy river access and facilities including possible canoe/ kayak/ boat storage facilities.	Development in this location should seek to enable greater recreational, leisure and sports use of the River Gipping, for example though the provision of 'portage' easy river access and facilities including possible canoe/ kayak/ boat storage facilities.	Remove ‘facilities’ to avoid repetition
IP120b	The repetitive design and single volume massing of the flats opposite on Ranelagh Road should be avoided, with a more bespoke approach design approach being employed for this landmark site.	The repetitive design and single volume massing of the flats opposite on Ranelagh Road should be avoided, with a more bespoke <del>approach</del> design approach being employed for this landmark site.	Remove ‘approach’ to avoid repetition
IP132	This site potentially represents that last surviving section of ‘early’ waterfront. There is high potential for archaeological remains of possible national significance, such as important waterlogged remains and	This site potentially represents that last surviving section of ‘early’ waterfront. There is high potential for archaeological remains of possible national significance, such as important waterlogged remains and	Remove underscore between ‘waterfront’ and ‘There’

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
	the potential remains of bridges dating from at least the 10th century.	the potential remains of bridges dating from at least the 10th century.	
IP132	Detailed early pre-application discussion with Suffolk County Council Archaeological Service and Historic England would be required to agree the scope of required assessment, the principle of development and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work).	Detailed early pre-application discussion with Suffolk County Council Archaeological Service and _Historic England would be required to agree the scope of required assessment, the principle of development and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work).	Remove underscore between 'and' and 'Historic'
IP132	In designing a scheme for this allocation site, attention should be paid to its sensitive location, which not only includes the grade II listed 4 College Street, but also sits to the immediate south of several highly significant heritage assets including the grade II* listed St Peter's Church, grade I and Scheduled Ancient Monument of the Gateway to Wolsey's College, the grade II 1-5 College Street.	In designing a scheme for this allocation site, attention should be paid to its sensitive location, which not only includes the grade II listed 4 College Street, but also sits to the immediate south of several highly significant heritage assets including the grade II* listed St Peter's Church, grade I and Scheduled Ancient Monument of the Gateway to Wolsey's College, <u>and</u> the grade II 1-5 College Street.	Change comma to 'and' to improve grammar
IP132	"Subject to layout of site - assume commercial uses..."	"Subject to layout of site - -assume commercial uses..."	Extra space deleted.
IP133	<b>DM23Adopted Plan 2017</b>	<b>DM23Adopted Plan 2017</b>	Delete 'DM32'
IP140	The north of this allocation site marks the borough boundary with the neighbouring Mid Suffolk District Council.	The north of this allocation site marks the <u>B</u> orough boundary with the neighbouring Mid Suffolk District Council.	Capitalise 'Borough' for consistency
IP149	"...to be interpreted as a historic cluster buildings which..."	"...to be interpreted as a historic cluster <u>of</u> buildings which..."	Grammar

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<u>Title/ Section</u>	<u>Final Draft Wording (Reg 19)</u>	<u>Submission Wording (Reg 22)</u>	<u>Reason</u>
IP150b	“To achieve biodiversity net gain, the recommendations of the Ipswich...”	“To achieve biodiversity net gain, the recommendations of -the Ipswich...”	Extra space deleted.
IP150b	Introducing development which would reduce the distinctive legibility of Ravenswood and its relationship with this rural edge therefore requires careful consideration.	Introducing development which would <b>not</b> reduce the distinctive legibility of Ravenswood and its relationship with this rural edge therefore requires careful consideration.	Add ‘not’ to improve sentence structure
IP150d	“In adopted plan as the whole of IP150b allocated as sports park”	“In adopted plan as the whole of IP150b allocated as sports park.”	Full stop added.
IP152	“...breeding birds and reptiles will be...”	“...breeding birds and reptiles -will be...”	Extra space deleted
IP152	B1, B2 and B8 development should be well designed and make a positive architectural statement, as they are likely to be the first buildings users of the Park and Ride will see when entering Ipswich from the east.	B1, B2 and B8 development should be well designed and make a positive architectural statement, as they are likely to <b>be</b> the first buildings users of the Park and Ride will see when entering Ipswich from the east.	Add ‘be’ to improve grammar
IP221	This should look to enhance the appearance of the public house, whilst still respecting the mid 20th character of the building.	This should look to enhance the appearance of the public house, whilst still respecting the mid 20th <b>century</b> character of the building.	Add ‘century’ for clarity
IP279	The site may have wildlife interest an ecological and reptile survey will be needed.	The site may have wildlife interest – an ecological and reptile survey will be needed.	Add hyphen to improve grammar

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**Chapter 6 - Objectives**

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
6.8  Objective 5  (page 30)	5. AIR QUALITY - Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.	5. AIR QUALITY <b><u>AND CLIMATE CHANGE</u></b> - Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.	To overcome representation ID 26367 (Save Our Country Spaces) and 26497 (Northern Fringe Protection Group)

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**Chapter 7 Key Diagram**

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Chapter 7 – Key Diagram Para. 7.2	Main issue 2: Whilst support allocation at Humber Doucy Lane, seeking minor amendments to detailed wording. Plan should not make generic references to "future" development or refer to requirement for phasing without appropriate evidence/details. Wording of paragraph 7.2 should be amended to reflect this.	Amend para. 7.2 as follows: The key diagram illustrates on a simple base map: (i) The IP-One Area Action Plan area and, within it, the Portman Quarter, Waterfront and Education Quarter (policy CS3); (ii) Key development locations identified including IP-One, and the District and Local Centres (from policy CS2); (iii) The approach to Ipswich Garden Suburb as the location of development to 2036 (from policy CS10); (iv) The cross-border allocation for <del>future</del> development, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, proposed at the northern end of Humber Doucy Lane through policy ISPA4; and (v) The ecological network, green corridor and green trail approach to strategic green infrastructure (policy CS16).	To overcome representation Kesgrave Covenant (Rep ID: 26439)

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**Chapter 11 – Key Targets**

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Objective 5  (page 208)	OBJECTIVE 5: AIR QUALITY	OBJECTIVE 5: AIR QUALITY <b><u>AND</u></b> <b><u>CLIMATE CHANGE</u></b>	To overcome representation ID 26367 (Save Our Country Spaces) and 26497 (Northern Fringe Protection Group)

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**Policy ISPA1 Growth in the Ipswich Strategic Planning Area**

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Paragraph 8.9	... However, using the current standard method and based on the household projections published by the Government in September 2019 and the affordability ratio published by the Office for National Statistics in April 2019, the current figures equate to a need for 35,334 dwellings across the Housing Market Area to reflect the housing figures as calculated using the 2014-based household projections and the 2018 affordability ratio published in March 2019. Table 8.1 below shows the figures and, for comparison purposes, the housing need as identified through the Government’s Right Homes, Right Places consultation in 2017.	...However, using the current standard method and based on the household projections published by the Government in September 2019 and the affordability ratio published by the Office for National Statistics in <del>April 2019</del> <u>March 2020</u> , the current figures equate to a need for <del>35,334</del> <u>34,200</u> dwellings across the Housing Market Area to reflect the housing figures as calculated using the 2014-based household projections and the <del>2018</del> <u>2019</u> affordability ratio published in March <del>2019</del> <u>2020</u> . Table 8.1 below shows the figures and, for comparison purposes, the housing need as identified through the Government’s Right Homes, Right Places consultation in 2017.	To reflect the publication of the affordability ratios in March 2020. Also to align with the ISPA Statement of Common Ground and take account of the consultation of the Main Modifications to the Suffolk Coastal Local Plan.
Table 8.1	See original table.	Insert two new columns to show the 2019 affordability ratio results. Please see revised table 8.1 below.	As above.

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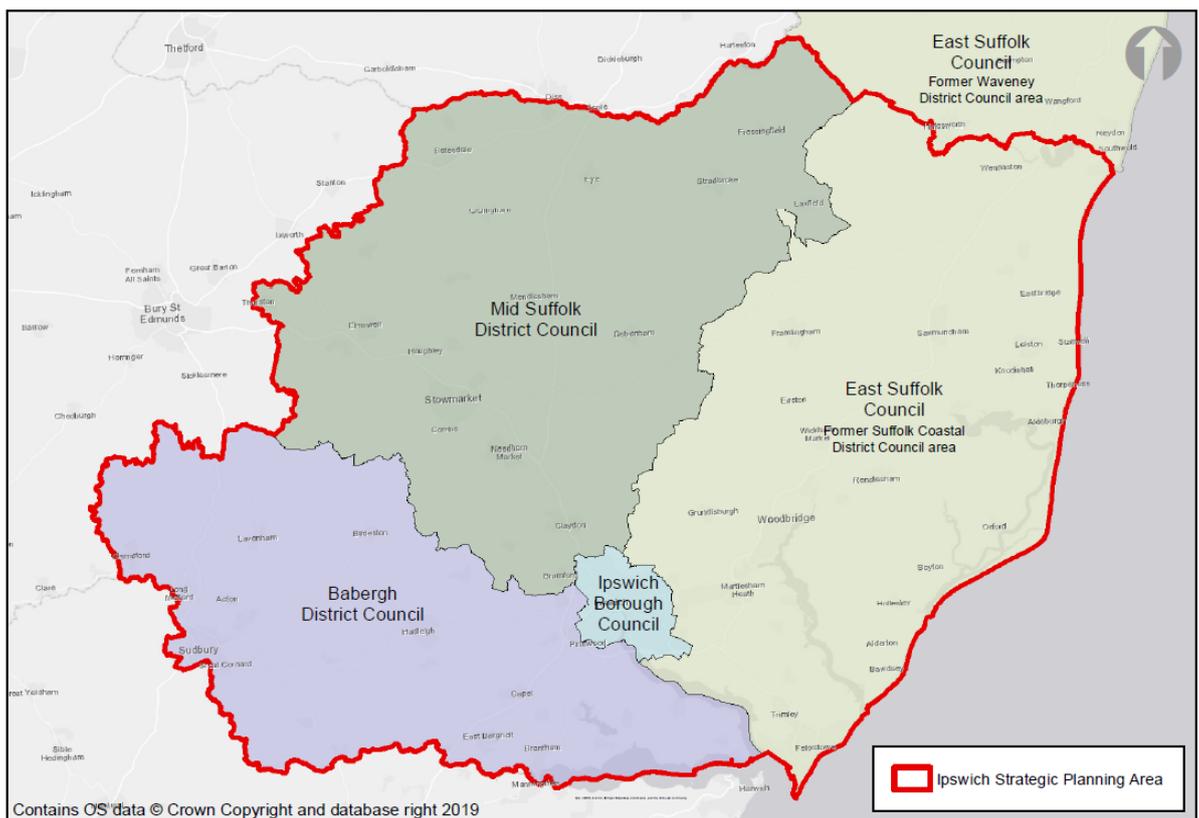
<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Policy Wording	b) The collective delivery of at least 35,334 dwellings across the Ipswich Housing Market Area 2018-36; and	b) The collective delivery of at least <del>35,334</del> <b>34,200</b> dwellings across the Ipswich Housing Market Area 2018-36; and	As above.

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**The Ipswich Strategic Planning Area**

- 8.3 Through this Local Plan, the ambition for Ipswich is to boost economic growth and housing delivery, to meet needs, unlock potential and support cohesive communities. However, Ipswich as the county town sits within a wider area, which demonstrates strong functional relationships. This wider area includes Mid Suffolk and Babergh Districts and the former Suffolk Coastal District element of East Suffolk Council, which all border Ipswich. Evidence produced as part of the production of the Local Plan demonstrates that the four authorities together form the Ipswich Housing Market Area and the Ipswich Functional Economic Area. The area has strong connections in terms of travel to work patterns and housing and commercial markets. The area is shown on the map below.
- 8.4 The four authorities, along with Suffolk County Council, have a history of working together on strategic planning issues through the former Ipswich Policy Area Board (now the Ipswich Strategic Planning Area Board or ISPA Board). The ISPA Board provides a mechanism for the five authorities to develop, promote and deliver a vision for the Ipswich Strategic Planning Area and to co-operate on the preparation and monitoring of Local Plans and to share relevant evidence. This joint working is a fundamental part of planning in the area.

Map 2 Ipswich Strategic Planning Area



- 8.5 The Councils have worked together on evidence relating to housing and employment needs and landscape sensitivity and all authorities have recently published evidence relating to retail and commercial leisure needs.
- 8.6 Under the 2011 Localism Act, local planning authorities are required to co-operate on strategic planning matters. The strategic planning matters within the Ipswich Strategic Planning Area cover a range of issues including housing need and distribution, provision of

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land to support economic growth and delivering green infrastructure. In recognition of these interdependencies, the authorities have closely aligned their timetables for the production of Local Plans. The policies in this section are based upon the recognised common strategic matters, and establish Ipswich Borough Council's commitment to joint working.

- 8.7 Joint or aligned approaches are also necessary to help Ipswich Borough meet future development needs, as the Borough is under-bounded. This means that choices about directions for growth at the edge of the town within the Borough boundary are limited. A cross boundary approach is the starting point to ensure that development required to meet local needs is provided in a planned and coordinated way, in the right locations, and creates successful places.
- 8.8 The five ISPA authorities, in reflection of the changes to the National Planning Policy Framework, are working together on the production of a Statement of Common Ground to document the joint working and agreements in relation to strategic matters, which will evolve over the course of production of Local Plans.

#### **Scale and location of growth**

- 8.9 On 24<sup>th</sup> July 2018, the Government published the revised National Planning Policy Framework. It introduces a standard method for calculating housing need based on the latest published household projections and applying an uplift based upon published ratios of median house prices to median workplace earnings (the 'affordability ratio'). This has since been updated in the February 2019 NPPF and the subsequent Planning Practice Guidance (PPG), 'Housing and Economic Needs Assessment (22 July 2019) which provides detailed workings of the Government preferred method. However, using the current standard method and based on the household projections published by the Government in September 2019 and the affordability ratio published by the Office for National Statistics in ~~April 2019~~ **March 2020**, the current figures equate to a need for ~~35,334~~ **34,200** dwellings across the Housing Market Area to reflect the housing figures as calculated using the 2014-based household projections and the ~~2018~~**2019** affordability ratio published in ~~March 2019~~**2020**. Table 8.1 below shows the figures and, for comparison purposes, the housing need as identified through the Government's Right Homes, Right Places consultation in 2017.
- 8.10 The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-

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Table 8.1 – Objectively Assessed Housing Need across the Ipswich Housing Market Area based on the standard method

	SHMA annual	SHMA total (2014-2036)	Standard method annual (Sept 2017)	Standard method total (2016 – 2036)	Standard method annual (2016-based)	Standard method total (2016-based) (2018-2036)	Standard method annual (2014-based)	Standard method total (2014-based) (2018-2036)	Standard method annual (2014 based, 2018 ratios)	Standard method total (2014 based, 2018 – 36) ratios,	<u>Standard method annual (2014 based, 2019 ratios)</u>	<u>Standard method total (2014 based, 2019 ratios, 2018 – 36)</u>
<b>Babergh</b>	355	7,820	439	8,780	420	7,560	420	7,560	420	7,560	<b><u>416</u></b>	<b><u>7,488</u></b>
<b>Ipswich</b>	519	11,420	442	8,840	479	8,622	445	8,010	445	8,010	<b><u>460</u></b>	<b><u>8,280</u></b>
<b>Mid Suffolk</b>	452	9,951	573	11,460	590	10,620	585	10,530	556	10,008	<b><u>535</u></b>	<b><u>9,360</u></b>
<b>Suffolk Coastal</b>	460	10,111	495	9,900	582	10,476	515	9,270	542	9,756	<b><u>489<sup>1</sup></u></b>	<b><u>8,802</u></b>
<b>Total</b>	1,786	39,302	1,949	38,980	2,071	37,278	1,965	35,370	1,963	35,334	<b><u>1,900</u></b>	<b><u>34,200</u></b>

Note: the Babergh figure of 420 p.a. includes the application of a cap on the uplift, as allowed for by the methodology.

<sup>1</sup> Following the creation of East Suffolk Council to replace the former Suffolk Coastal and Waveney District Councils from 1st April 2019, the affordability ratios for 2019 (published in March 2020) are at the East Suffolk level. The East Suffolk affordability ratio is therefore used in this calculation.

- 8.11 The standard method forms an appropriate starting point for identifying a housing requirement. The starting point for each authority will be to meet their own needs within their own boundary. Policy CS7 sets out the housing requirement identified for Ipswich Borough and how it will be met. The ISPA Statement of Common Ground identifies circumstances that would trigger a Local Plan review in relation to any ISPA authority's ability to meet its own housing need.
- 8.12 The authorities also jointly commissioned a Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (2017) which identified needs for Gypsy and Traveller provision as follows:

Table 8.2 – Needs for Gypsy and Traveller accommodation in the IHMA

	Needs for permanent Gypsy and Traveller pitches <sup>2</sup> (2016 – 2036)
Babergh	1
Ipswich	27
Mid Suffolk	9 – 30
Suffolk Coastal	15
IHMA	52 – 73

- 8.13 The starting point for each authority will be to meet the needs within their own areas.
- 8.14 The authorities jointly commissioned the production of the Employment Land Needs Assessment, and the subsequent Economic Area Sector Needs Assessment, to identify the needs of the different employment sectors and the associated land requirements. This evidence demonstrates that the area functions as one Functional Economic Area and that there are distinct economic geographies within the area namely:
- Felixstowe / A14 corridor
  - Wider Ipswich Market Area
  - A140 corridor
  - Rural and agricultural
- 8.15 The baseline jobs growth and employment land requirements are as shown in Table 8.3 below. They have been adjusted from the study figures to update to a 2018 baseline for the Local Plan Review. It should be noted that the baseline jobs growth for Ipswich has been re-adjusted to reflect the 2017 East of England Forecasting Model (EEFM), contrary to the 2016 EEFM used in the Preferred Options Local Plan and as adopted by the other IFEA authorities. This is because the 2017 EEFM identified a forecast jobs requirement of 9,318 jobs between 2018 – 2036, equivalent to a 40% reduction compared to the 2016 EEFM jobs forecast of 15,577 jobs. In contrast, the forecast jobs growth for the other authorities in the IFEA are not significantly affected by this update to the evidence base.

Table 8.3 – Baseline jobs growth and employment land requirements in the ISPA

<sup>2</sup> A pitch is an area on a site developed for a family unit to live.

NB: This response incorporates the Council's initial views on the representations received through the Regulation 19 Consultation. The Council reserves the right to review its stance as it proceeds through the examination process.

	Baseline jobs growth (2018-2036)	Minimum employment land requirements (B1, B2 and B8 uses) (2018 – 2036)
Babergh	2,970	2.3ha
Ipswich	9,500	23.2ha
Mid Suffolk	5,270	7.7ha
Suffolk Coastal	6,500	11.7ha
IFEA	24,060	44.9ha

- 8.16 Evidence of needs for retail and commercial leisure has been produced for Ipswich and Suffolk Coastal, and for Babergh and Mid Suffolk. This evidence supports the continuing role of Ipswich as the county town and provides quantitative requirements for comparison shopping (non-food) and convenience shopping (food) over the plan period. Ipswich Borough Council has commissioned an update of the retail element of this evidence base, the results of which will inform Policy CS14.

#### **Policy ISPA1 Growth in the Ipswich Strategic Planning Area**

**Ipswich will continue to play a key role in the economic growth of the Ipswich Strategic Planning Area (ISPA), whilst enhancing quality of life and protecting the high quality environments. Over the period 2018-2036, the Ipswich Borough Council Local Plan will contribute to:**

- a) **The creation of at least 9,500 jobs through the provision of at least 23.2ha of employment land within Ipswich to contribute towards the Ipswich Functional Economic Area;**
- b) **The collective delivery of at least ~~35,334~~ 34,200 dwellings across the Ipswich Housing Market Area 2018-36; and**
- c) **Supporting the continued role of Ipswich as County Town.**

**The Council will work actively with the other local planning authorities in the ISPA and with Suffolk County Council to co-ordinate the delivery of development and in monitoring and reviewing evidence as necessary.**

NB: This response incorporates the Council's initial views on the representations received through the Regulation 19 Consultation. The Council reserves the right to review its stance as it proceeds through the examination process.

## Policy ISPA4 – Cross Boundary Working to Deliver Sites

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Policy ISPA4	Main issue 11: Paragraph 8.28 refers to transport mitigation measures required for the development of the site at Humber Doucy Lane being "challenging". This is not considered to be the case and current reference to "challenging" transport mitigation measures not justified. Recommend amendment to paragraph 8.28.	Change para. 8.28 as follows: The site allocation at the northern end of Humber Doucy Lane is located at the edge of Ipswich approximately 3.5km from the town centre. Sustainable transport connections will be key to providing linkage to employment and other opportunities. In addition, it is acknowledged that the transport mitigation measures required for the development of the site are <b>challenging</b> and it is essential that significant modal shift is delivered through strong travel plans and other sustainable measures.	To overcome representation Kesgrave Covenant (Rep ID: 26441)
Paragraph 8.24	...Policy ISPA 4 identifies the likely impacts of the development which would have to be mitigated in relation to demand arising from potential residents such as transport infrastructure and sustainable transport initiatives to create potential for a substantial modal shift change and green infrastructure. As part of the master plan work, mitigation measures required that arise from demand created by the development will be reconsidered,	...Policy ISPA 4 identifies the likely impacts of the development which would have to be mitigated in relation to demand arising from potential residents such as transport infrastructure and sustainable transport initiatives to create potential for a substantial modal shift change and green infrastructure. As part of the master plan work, mitigation measures required that arise from demand created by the development will be reconsidered, including	Following consultation with Suffolk County Council (Rep ID 26579) in preparing the Statement of Common Ground.

NB: This response incorporates the Council's initial views on the representations received through the Regulation 19 Consultation. The Council reserves the right to review its stance as it proceeds through the examination process.

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
	including possibly the need for healthcare facilities. <a href="#">ISPA4 AND SUPPORTING TEXT</a>	possibly the need for <b><u>convenience retail</u></b> <b>and</b> healthcare facilities.	

NB: This response incorporates the Council's initial views on the representations received through the Regulation 19 Consultation. The Council reserves the right to review its stance as it proceeds through the examination process.

## CS17 – Delivering Infrastructure

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
8.212	<p>There are a number of ways to ensure infrastructure delivery through the planning system. The existing system in Ipswich is that of: developer obligations secured in Section 106 Agreements, which cover on- and off-site requirements including affordable housing, open space provision, transport measures, and education provision. However, this system has not adequately picked up more strategic infrastructure impacts or needs.</p>	<p>There are a number of ways to ensure infrastructure delivery through the planning system. The existing system in Ipswich is that of: developer obligations secured in Section 106 Agreements, which cover on- and off-site requirements including affordable housing, open space provision, transport measures, and education provision. However, this system has not adequately picked up more strategic infrastructure impacts or needs.</p> <p><b><u>Department for Education have indicated that they are able to forward fund schools in advance of the S106s being signed to assist growth and delivery.</u></b></p>	<p>To overcome representation ID 26541 (Department for Education)</p>

NB: This response incorporates the Council's initial views on the representations received through the Regulation 19 Consultation. The Council reserves the right to review its stance as it proceeds through the examination process.

## DM11 - Countryside

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Paragraph 9.11.3	Ipswich also contains a small area of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) on the southern boundary of the Borough. The NPPF sets out the approach to considering major development applications within the AONB in paragraph 172. The definition of major development in respect of development within the AONB is defined by footnote 55 of the NPPF and is matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.	Ipswich also contains a small area of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) on the southern boundary of the Borough. The NPPF sets out the approach to considering major development applications within the AONB in paragraph 172. The definition of major development in respect of development within the AONB is defined by footnote 55 of the NPPF and is matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined <b><u>or on the setting of the AONB.</u></b>	To overcome representation ID 26244 (Suffolk Preservation Society)

NB: This response incorporates the Council's initial views on the representations received through the Regulation 19 Consultation. The Council reserves the right to review its stance as it proceeds through the examination process.

## Appendix 6 – Marketing Requirements

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Paragraph 2.2	This exercise should take all considerable steps to actively market the site and should consider a number of methods such as site notices, promotion through land or estate agent, advertisement on an estates gazette or through websites and information of all methods used should be provided to the Council.	This exercise should take all considerable steps to actively market the site and should consider a number of methods such as site notices, promotion through land or estate agent, advertisement on an estates gazette or through websites and information of all methods used should be provided to the Council. <b><u>The level of marketing of the site must be proportionate to the type and availability of the facility/ use that is being marketed. For example a commercial property should be published by an agent with expertise in marketing commercial uses and marketed at a geographical area (local, regional and/or national) based on the prevalence of this type of use/ facility (e.g. the more unique the existing use/ facility, the wider it should be marketed).</u></b>	To overcome representation ID 26236 (Theatres Trust) and provide greater clarity in terms of the sought marketing requirements.

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## IP150b – Land south of Ravenswood

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Final paragraph supporting text	Ravenswood has a distinctive spoke and wheel layout which allows for the residential development to blend comfortably into the heathy landscape of Ravenswood Park. The curved design of the estate acts as a soft edge to the development, leading to the rural edge of the borough. Introducing development which would reduce the distinctive legibility of Ravenswood and its relationship with this rural edge therefore requires careful consideration.	<p>Ravenswood has a distinctive spoke and wheel layout which allows for the residential development to blend comfortably into the heathy landscape of Ravenswood Park. The curved design of the estate acts as a soft edge to the development, leading to the rural edge of the borough. Introducing development which would reduce the distinctive legibility of Ravenswood and its relationship with this rural edge therefore requires careful consideration.</p> <p><b><u>The site is within close proximity to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). An assessment of the impact on this AONB will be required, including the impact of any proposed floodlighting.</u></b></p>	To overcome representation ID 26285 (AONB Unit).

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## IP141a Land at Futura Park, Nacton Road (formerly the Cranes Site)

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Supporting Text.	<p>TPOs nearby fronting Nacton Road (an application for tree works may be required). Possible contamination. Adjacent to railway wildlife corridor and buffer. Surveys for reptiles, bats and detailed terrestrial invertebrate surveys are required. The recommendations of the Ipswich Wildlife Audit 2019 could be incorporated into future development, unless other means of biodiversity enhancement are appropriate.</p>	<p>TPOs nearby fronting Nacton Road (an application for tree works may be required). Possible contamination. Adjacent to railway wildlife corridor and buffer. Surveys for reptiles, bats and detailed terrestrial invertebrate surveys are required. <b><u>The site is within close proximity to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). Development will need to demonstrate that it will not harmfully impact the AONB.</u></b> The recommendations of the Ipswich Wildlife Audit 2019 could be incorporated into future development, unless other means of biodiversity enhancement are appropriate.</p>	<p>In response to representation ID 26259 (AONB Unit)</p>

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## IP150d – Land south of Ravenswood

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Final paragraph supporting text	Ravenswood features distinctive pockets of development, utilising varied architectural approaches and palette of materials which gives the estate an interesting character, such as dwellings along Downham Boulevard and Cranberry Square. This individual approach should be employed on this allocation site to provide a bespoke design which contributes to the character of Ravenswood and avoid replicating some of the plainer neo-Georgian design of Alnesbourne Close to the north.	<p>Ravenswood features distinctive pockets of development, utilising varied architectural approaches and palette of materials which gives the estate an interesting character, such as dwellings along Downham Boulevard and Cranberry Square. This individual approach should be employed on this allocation site to provide a bespoke design which contributes to the character of Ravenswood and avoid replicating some of the plainer neo-Georgian design of Alnesbourne Close to the north.</p> <p><b><u>The site is within close proximity to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). An assessment of the impact on this AONB will be required.</u></b></p>	To overcome representation ID 26185 (Hallowtree Scout Centre)

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## IP150e – Land south of Ravenswood

<u>Title/ Section</u>	<u>Submission Wording (Reg 22)</u>	<u>Requested Post-Submission Wording</u>	<u>Reason</u>
Final paragraph supporting text	Ravenswood benefits from several sculptures and public art commissions, which enhance the environment in which the estate is experienced, and responds to the high quality design and aspirations of the Ravenswood development. Development of this allocation site should look to introduce further public art to well designed and integrated public space to the allocation site.	Ravenswood benefits from several sculptures and public art commissions, which enhance the environment in which the estate is experienced, and responds to the high quality design and aspirations of the Ravenswood development. Development of this allocation site should look to introduce further public art to well designed and integrated public space to the allocation site.  <b><u>The site is within close proximity to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). An assessment of the impact on this AONB will be required.</u></b>	To overcome representation ID 26185 (Hallowtree Scout Centre)

NB: This response incorporates the Council's initial views on the representations received through the Regulation 19 Consultation. The Council reserves the right to review its stance as it proceeds through the examination process.