

IPSWICH GARDEN SUBURB SUPPLEMENTARY PLANNING DOCUMENT

INTERIM GUIDANCE

CONSULTATION STATEMENT - OCTOBER 2014

1. INTRODUCTION

- 1.1 During the course of drafting the SPD, various stages and methods of consultation were undertaken. From these consultations and engagement, representations received consisted of comments from a range of stakeholders including: Suffolk County Council; statutory consultees; interest groups and societies; and residents.
- 1.2 The consultation process was undertaken over several stages, which included:-
- Call for Ideas - During April and May 2012 Ipswich Borough Council carried out informal consultation in the form of a “call for ideas”.
 - Issues and Options – A report was published outlining the identified issues and options for the site in December 2012 and public consultation was undertaken January and February 2013.
 - Draft SPD – Following production of a draft SPD, public consultation was undertaken January –March 2014.
- 1.3 The feedback received and how this was addressed within the evolving SPD is well documented. A summary of responses and reports from the first two consultation stages can be viewed at the following Council web page:-
- Call for Ideas summary and response see <https://www.ipswich.gov.uk/content/ipswich-garden-suburb-development-brief-supplementary-planning-document-call-ideas>
 - Issues and Options summary and response see <https://www.ipswich.gov.uk/content/about-ipswich-northern-fringe>
- 1.4 The final stage which involved wider extensive public consultation of the draft SPD, is documented within a report to Council which recommended a series of amendments to the draft SPD in light of comments received and following incorporation of those changes, it was recommended that the SPD was adopted as interim guidance pending full adoption in 2015. The full Council report can be viewed here <https://democracy.ipswich.gov.uk/documents/s8752/C-14-02%20Ipswich%20Garden%20Suburb%20SPD.pdf> , and the following section of this statement is taken from the Council report and details the consultation undertaken on the draft SPD and action taken to address the comments made.
- #### 2. DRAFT SPD CONSULTATION
- 2.1 An eight week period of statutory consultation was under taken from Monday 13th January 2014 to Monday 10th March 2014. This was an extended period to take account of simultaneous consultations on the Council’s Local Plan documents. Public notices and a total of 3,925 letters and emails were sent to notify residents, statutory

consultees and interested parties of the consultation period and exhibition locations and dates.

- 2.2 The staffed exhibitions covered five locations: Gainsborough Sports Centre; Henley Road Sports Club; Westerfield Church; Town Hall and Colchester Road Baptist Church with a total of 518 people recorded as attending over ten days. The exhibition also covered the consultation on Core Strategy Focused Review and Site Specific Allocations proposals.

3. RESPONSES RECEIVED TO DRAFT SPD

- 3.1 Responses were received from a total of **479** different addresses and organisations. A table detailing the external consultees who commented on the document can be found in appendices 1-8.

- 3.2 Written responses to the public consultation were received in three main formats with total numbers received for each in brackets:-

1. Comment Forms (89 received) – these were produced by Ipswich Borough Council (IBC) for people to make representations, and were designed as a structured questionnaire based on the chapters of the SPD.

2. Northern Fringe Protection Group (NFPG) consultation pro-forma (362 received) – these were produced by the NFPG and circulated to residents. It combines both Core Strategy and SPD feedback, including commentary and tick box section for individuals to express agreement with a series of statements.

3. Individual Correspondence (76 received) – included private letters and responses from a range of residents, statutory consultees, interested parties and landowners.

- 3.3 It is important to note that more than one format of response was received from one address. Hence the totals received of each format exceeds the 479 total mentioned in paragraph 3.1 above.

- 3.4 Furthermore a letter from the Northern Fringe Protection Group is stated to be making representation on behalf of 323 people (which is a total of its 183 members and 140 other residents who have authorised the NFPG to represent them).

- 3.5 Given the volume of responses received it has been necessary to group the feedback received and summarise in tables attached as appendices to this statement.

- 3.6 The following summary tables have been produced and can be viewed at the noted appendix:-

Appendix 1: Residents summary of comments

Appendix 2: NFPG consultation pro forma summary

Appendix 3: Consultees summary of comments

Appendix 4: NFPG summary of comments

Appendix 5: Save Our Country Spaces (SOCS) summary of comments

Appendix 6: Other interested parties summary of comments

Appendix 7: IGS Landowner / Developer summary of comments

Appendix 8: SA / SEA Responses – summary of comments

- 3.7 The purpose of the public consultation of the draft SPD was to gain feedback on its content and whether the strategies and masterplan delivered the key objectives of the Ipswich Garden Suburb vision. A very large proportion of the responses received were focused on policy matters which are not for consideration within the SPD. Issues relating to the allocation of the land for development and loss of agricultural land, are frequently raised along with concerns that brownfield sites and existing housing stock within Ipswich should be developed prior to development at Ipswich Garden Suburb (IGS) being commenced. These are not matters for the SPD to address but are strategic policy issues which have been considered as part of the present Core Strategy or are being considered through the Core Strategy Review.
- 3.8 The IGS area has been identified as a strategic site for housing and therefore the principle that it can be developed for housing has been established. Housing need for the borough has also been reviewed and it is concluded that IGS alongside brownfield sites within Ipswich are required to fulfil the Borough's housing need and the Core Strategy Review has therefore made the necessary alterations to policy CS10 to reflect this.
- 3.9 There was disappointment expressed that the foreword is misleading since it does not reflect the Council's position expressed in the Core Strategy Review. It gives the impression that development will not take place in other locations until after 2021, which is not the Council's intention as explained in para 1.10 and chapter 7 of the SPD. In response it is noted that the foreword was written in the context of planning policy relevant at the time, although the Council does have some emerging policy which has been picked up in the SPD to ensure it is addressing the likelihood of alternative development options which may come forward in the future. The need to update the foreword is recognised and has been undertaken as part of the interim adoption of the SPD.
- 3.10 In addition to the concerns regarding the principle of developing IGS, a number of other concerns were frequently raised. The following section of the statement covers the main topics of concern which were raised by respondents. A complete summary of all points made and relevant IBC response, is contained in the comment tables which are attached as appendices to this statement.
- 3.11 The following issues are summarised along with officers responses as to how it is considered these have been addressed in the SPD or where appropriate alterations need to be made and included in the interim guidance version of the SPD:-
- Transport
- 3.12 A recurrent point which is expressed very strongly in many of the responses received is a concern with the transport impacts resulting from the proposed development and the inadequacy of the Transport Strategy set out within the SPD to deal with those impacts. Primarily there is a view that the existing road network is insufficient to deal with the extra traffic generated by the proposals and the mitigation suggested in the SPD does not go far enough. Many responses consider that substantial improvements are required and many cite the 'northern bypass' as a solution which should be in place before development commences in the IGS area. For the mitigation which is outlined in the SPD, there is concern that the replacement of existing roundabouts along Valley Road with traffic lights will reduce traffic flows further and compound existing problems with traffic congestion in this area. There is also a general view expressed that the reliance on the car is underestimated and the locations of existing and future employment sources have not been factored in. The knock on effects on this to air quality and the commercial attractiveness of Ipswich as a town for future investment is considered to be detrimental as a result.

- 3.13 The strength of feeling on this matter is recognised and residents' concerns are understood. However, in identifying this site for housing Suffolk County Council as highway authority have accepted the principle of up to 5,000 homes being built at IGS without the need for any new road building subject to an appropriate sustainable transport strategy. This is set within a context of the highway authority's general strategy (Ipswich Fit for the 21st Century strategy now known as Travel Ipswich) which is to prioritise sustainable modes / achieve a modal shift and secure better management of the existing network rather than building additional road space.
- 3.14 The Transport Strategy set out in chapter 6 of the SPD sets out the measures by which sustainable modes of transport could be prioritised for IGS along with exit points which are traffic light controlled to enable traffic flows to be controlled onto the existing road networks. This along with the master plan contained in the SPD illustrates how a good range of local facilities could be provided within walkable neighbourhoods, together with excellent cycle and walking connections within the site to maximise accessibility. These measures are among a range contained within the SPD which are considered to encourage lower car usage. Connectivity to other parts of the Borough by a variety of transport modes is necessary.
- 3.15 It is of course recognised that there will still be vehicular traffic resulting from the proposed development. However, the houses are needed and building anywhere in Ipswich will result in traffic increase. Given the scale of IGS and the comprehensive way in which it is intended to be planned through the SPD, there is an opportunity to reduce this number through the site wide measures outlined in the SPD and make improvements to sustainable modes of transport in the area such as bus and train services.
- 3.16 A detailed transport assessment is required to be submitted with future planning applications. This will give a more detailed assessment of the traffic resulting from the developments and from this a scheme of mitigation can be determined in order to ascertain the improvements/traffic calming needed to surrounding roads and junctions, cycle / pedestrian connections and increased capacity to public transport. Wherever houses are built, traffic will increase.
- 3.17 Transport effects will be considered within Environmental Impact Assessments to be submitted with planning applications.
- 3.18 In general terms it must be acknowledged that the site, in being about 1 mile away from the central area of the largest urban area in Suffolk, is within an inherently sustainable location.
- Drainage / Flooding
- 3.19 Concerns have been expressed regarding the proposed drainage strategy for the site, given the nature of the clay soil and existing problems with flooding in the area. There is concern that the problem has not been fully investigated nor sufficient sensitivity factored in for more extreme weather events. Going forward, questions have been raised as to how an effective SuDS can be secured and maintained.
- 3.20 Pages 73-74 of the SPD sets out more on the SuDS strategy and identifies the preliminary work which has been undertaken and concludes that a strategy can be implemented which is effective. The preliminary SuDS strategy takes account of increases in expected peak rainfall intensity in accordance with national guidance. Details of the adoption and supervision of SuDS, will need to be submitted and approved as part of the planning application before construction can commence.

3.21 Concerns are also noted that the IGS SPD SuDS proposals do not appear to provide a solution that fully fits with recommendations of the IBC drainage engineer. Further information relating to the hydrology and topography of the site are also considered necessary to show how these have informed the flood prevention and SuDS. In discussion with the IBC drainage engineer, some alteration and additional information has been included in the SPD with regards to drainage. The preliminary SuDS strategy has also moved from being a draft document to being adopted as part of the SPD (copy of this can be viewed at https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/Preliminary_SuDS_master_plan_ver6_.pdf). This includes topography and hydrology information for the site. The strategy has informed the basis for the content of the SPD and sets out the work upon which the future planning applications are expected to develop within their proposals. The preliminary SuDS strategy does highlight that figure 12 (location of SuDS) which is included in the present SPD draft is an indicative plan of the likely position of the strategic SuDS. This means that further detailed assessments and strategy may result in alterations to the noted size and location of the strategic SuDS, and that the development plan and areas identified as residential may need to alter as the required SuDS strategy is developed. It is already noted in the key recommendations set out in para 4.53 of the SPD, the aspects of the SuDS strategy which require further consideration, but in order to highlight the iterative nature of the SuDS strategy produced so far it is considered necessary to reiterate the indicative nature of figure 12 and that the detailed SuDS design may result in parts of the residential areas proposed in the development plan being needed to accommodate strategic areas of SuDS.

3.22 Drainage effects will be subject to Environmental Impact Assessments to be submitted with planning applications

Infrastructure

3.23 Comments were received requesting more detail on the necessary sewage infrastructure improvements be included in the SPD. The Environment Agency have also commented that the necessary upgrades and capacity issues on the matter, should be explored prior to submission of an application and that this is supported by para 162 of NPPF. At this time discussions are ongoing between Anglian Water and developers on the matter. The SPD sets out the need for a comprehensive SPD wide Infrastructure Delivery Plan to be included with any future planning application which will need to provide further detail on this issue. It is important to note that Anglian Water have not raised objections to the SPD or in that regard the infrastructure requirements set out within it.

3.24 The Core Strategy Review seeks to introduce flexibility on land release across the SPD area and on that basis some points have been raised regarding the effectiveness of some of the trigger points for infrastructure needing to be based on site-wide housing triggers rather than based on individual neighbourhoods. This is recognised and the trigger points for some items of infrastructure have been amended accordingly.

3.25 Overall there is some concern related to how the necessary infrastructure will be secured. The SPD does require a detailed development sequencing and infrastructure delivery plan that covers the whole Garden Suburb, to be submitted with the future planning applications. These are expected to set out the proposed sequence delivery of the development proposed in the application and the supporting infrastructure outlined in the SPD. This will form the basis for applications to be assessed and appropriate conditions and legal agreements (under S106 of the Town

and Country Planning Act 1990) to be agreed to secure the necessary infrastructure at the appropriate times. As set out in the SPD the whole process will be subject to scrutiny by a future proposed Delivery Board to be set up by the Council specifically to monitor, review and manage the successful delivery of the garden suburb. It is expected that the Delivery Board would be established after the Core Strategy Review has been adopted.

- 3.26 As shown by Table 1 in the SPD, the Council has produced a list of infrastructure and service requirements that it believes necessary to mitigate the impact of the wider development and secure the delivery of a sustainable urban extension to Ipswich. The list may continue to be refined as further information on need and local capacity issues comes to light, whilst further discussions between IBC and the various developers should help to update the trigger points for securing infrastructure or contributions thereto where appropriate.
- 3.27 Viability: Subsequent to drawing up the initial version of this list, the Council procured independent viability advice to help inform the deliverability and viability of the identified infrastructure. The appointed consultant, Peter Brett Associates (PBA), has produced a development appraisal that is considered in accordance with the National Planning Policy Framework and the latest available guidance on viability as required by the Council's brief. It is considered important to emphasise to Councillors that development viability testing is an ongoing process, and since the main body of work was carried out by PBA (April - October 2013) there have been increases in both build costs and house prices within Ipswich. As such, the position as presented by PBA can only be construed as indicative at the time of testing.
- 3.28 Affordable Housing: Notwithstanding, PBA find that the scheme is able to deliver the level of infrastructure as listed in the SPD (which although now amended remains at a similar overall cost) alongside affordable housing provision that will be low in the initial phases of development but increases to around the policy target of 35% and above towards the end of the build period. However, the exact level of affordable housing will continually be assessed throughout the phases of development in line with changes to both development costs and revenues.
- 3.29 Initial discussions on scheme viability have also taken place with one of the prospective developers of the site, Crest Nicholson, and their appointed cost consultants EC Harris. The viability model used by EC Harris indicated that a lower amount of affordable housing could be achieved when compared to PBA's findings, although this was shown alongside the full complement of supporting infrastructure such that officers are confident that the delivery of this and affordable housing is achievable.
- 3.30 However, in order to improve scheme viability and therefore maximise the level of affordable housing that can be provided, it is considered that some of the trigger points for infrastructure delivery as previously included in the SPD (and as tested) can be moved until such a time when the development is generating more revenue, which in turn would reduce financing costs to the developers. This is particularly relevant to the initial phases of development, where development costs including site preparation and initial road junction improvements around the site would be incurred without any house sales. As such, a revision has been undertaken to the trigger point for the completion and land transfer of initial ancillary works to include the visitor facility / community centre at the Country Park, so that it is noted as the occupation of 500 dwellings in Henley Gate rather than 300, which in addition to improving scheme viability would allow for the further expansion of the neighbourhood to enable utilities and road infrastructure to connect this part of the site.

- 3.31 Following consultation with the local agents for the NHS a serviced site with contributions is now seen as the optimal solution for the delivery of a health centre, rather than a reserved site as currently specified in the draft SPD. NHS Suffolk representations have identified a deficit in primary health care capacity in the catchment area to IGS. It is therefore advised that in order to ensure new primary health care capacity is delivered for IGS residents, a site of sufficient size to meet the related health care needs is provided, along with developer contributions in order to bring forward a health centre at an appropriate point by an NHS body. It has been ascertained that based on the population arising from IGS, a 0.2ha sized site is an approximation of the area required at this stage, which would include parking, drainage and landscaping.
- 3.32 It is considered that other changes to the table are included to add clarity to what would be required, with some items now merged where appropriate, whilst there is an additional reference to the provision of on-site signage (monoliths) which was not included previously but has been indicated as a requirement in previous development viability testing.
- 3.33 Consequently, at this stage it is considered that the Council should aim to secure the infrastructure as listed in the table and at appropriate points in the development as indicatively shown, in order to suitably mitigate the impacts of the development and secure a sustainable form of development. Officers also consider that the viability evidence at this stage supports the provision of an element of affordable housing in the first phase(s) of development, and thereafter the Council should look to secure at least the policy target subject to viability testing at the appropriate time.
- 3.34 It should also be noted that the SPD allows for developers to put forward their own triggers/infrastructure delivery plans which would be considered on their own merits having regard to the overall SPD, and all relevant considerations. Infrastructure impacts will be quantified in Environmental Impact Assessments which will have to be submitted with individual planning applications.
- 3.35 Westerfield Rail Station: More recently Network Rail have begun to present proposals as part of their operational improvements to the line, which include relocating Westerfield Railway Station to the west side of Westerfield Road. The implications for improved passenger and station facilities, together with parking facilities need to be further discussed with Network Rail, to ensure successful collaboration on the matter and maximising the transport potential of this rail facility in the context of the IGS proposals.

Design and Scale

- 3.36 Concerns have been raised that the density of the garden suburb is inappropriate for this area of Ipswich and will not be consistent with the pattern of development which adjoins the site. It is also highlighted that the density proposed and minimum garden sizes set out in the document will not result in the character envisaged for a garden suburb. In response to this it is advised that the garden sizes accord with adopted planning policy and the density is set at a level which balances the desire to make the most efficient use of this greenfield site and still enables an appropriate character to be achieved. Minimum distances between certain house elevations are advised within the SPD to ensure sufficient spacing between properties and levels of residential amenity. This is in part to make the most of this greenfield site in terms of meeting the housing needs of the borough, although it should be noted that this is at the lower end of the housing densities currently advised in the Council's planning policy (policy DM30). Despite being denser than adjoining areas of housing, there are

still substantial areas of strategic green space which are required in the SPD, and this together with the very clear view on the garden city principles included in the SPD is considered to provide sufficient basis and does not compromise on the garden suburb character which the SPD seeks to achieve. The density proposed (35 dph net) is compliant with policy DM30.

Community Development

- 3.37 Some concerns have been raised which assert inadequate provision being made within the document for certain sectors of the community – such as older people including the elderly, ethnic minorities, teenagers as well as certain community uses being allocated within the plans such as churches. The SPD does not make reference to provision for certain community / ethnic / religious groups. It does however propose a mix of housing and community facilities which would be available to all groups but does not identify specific community uses at this stage. Chapter 8 of the SPD sets out how community development will be established in the development and this will be the process by which future community needs are identified and accommodated.
- 3.38 Also in response to concerns raised relating to the IGS development not being very integrated with the existing town, it is noted that the SPD identifies ways in which development can integrate with the town through transport connections (eg. paras 6.10 and 6.25). Also the SPD takes account of the wider needs of Ipswich through provision of the Country Park and Visitor Centre as well as fulfilling housing need for the town. The Community Development Strategy which will need to be submitted and agreed, will set out how the new community will be established and develops links with the surrounding neighbourhoods.

Air Quality

- 3.39 Following on from concerns relating to traffic is the impact this will have on existing air quality within the town. Detailed assessments of air quality and necessary monitoring and mitigation will be determined at planning application stage in the Environmental Impact Assessment. These will be based on traffic modelling submitted with the planning applications.

Long Term Management / Maintenance

- 3.40 Included in some of the responses were some queries and concerns relating to the long term management and maintenance of the public open spaces and community spaces. A point is also raised in reference to any future service charge on residents not being fair if it is to be put towards provision which is open to use by other residents or should be paid for through existing council tax charges.
- 3.41 As set out in chapter 9 of the draft SPD, the exact details of how the future management and maintenance of IGS public open space and community facilities would operate does need further investigation. In line with Garden City principles the management of the public and community spaces could be undertaken by a management trust which would ensure the ongoing opportunity for local residents to play an active role in their operation and provision. Alternatively, or in addition IBC could play a positive role in the long term management of the public open spaces. This requires further investigation by the Council and progression through a future Delivery Board.
- 3.42 Whilst alternative arrangements to management and maintenance would be further explored, it is likely that the Country Park elements would remain the responsibility of the council and the funding aspects highlighted in responses would be a consideration in this option. The investigation of alternative management models

does not preclude the council from having a potential option in this, and it is proposed to include some additional wording to that affect to paragraph 9.5 of the draft SPD.

- 3.43 In the long term it is envisaged that SuDS would be maintained by a SAB (SuDS Approving Body) which in this instance would be Suffolk County Council. The requirement for SABs and their role is to be established in future legislation which is expected to be brought in next year. In the event that this does not come in prior to consideration and determination of a planning application on IGS, interim management arrangements will need to be approved.

Loss of Biodiversity / Trees / Hedgerows

- 3.44 There have been in principle concerns at the impact the proposed IGS will have on these issues as well as more specific concerns on how these will be addressed in the SPD. The preparation of the SPD has been informed by a comprehensive habitat survey of the area carried out for the Council by the Suffolk Wildlife Trust. This survey identifies the main habitats of value as being the existing hedgerows, pockets of woodland, and mature trees on the site.
- 3.45 Ecology and Biodiversity assessments are required to be submitted with future planning applications/Environmental Impact Assessments and these will identify necessary ecology / biodiversity measures needed to maintain and enhance the value of site for wildlife. More detailed hedgerow and tree surveys are also required as part of the future planning applications and these would ascertain the arboricultural quality and extent of trees/hedgerows to be retained in the IGS area.
- 3.46 In terms of approach there are concerns that the SPD does not go far enough in protecting and ensuring the existing trees and hedgerows are retained in the proposed development. In particular reference has been made to the removal of one specific sentence from IBC's Vision Statement & Core Objectives "... the retention of existing on site vegetation – the retention of existing trees and hedgerows in the interest of biodiversity and in order to maintain and improve the canopy cover, which is a defining characteristic of the adjacent St Margaret's Ward" which is felt to indicate a contradiction to the sustainability principles and the garden suburb concept set out in the SPD.
- 3.47 It is considered that the very strong and clear green vision for IGS remains throughout the SPD. In particular the 'Character' theme for SPD vision clearly sets out the expectation that the garden suburb will be landscape dominated which includes new planting, open spaces and the retention of the best of existing hedgerows and trees for nature (para 2.17). Further details on the importance of Landscape and Open Space within IGS is included on page 54 and refers to existing trees, hedgerows and woodland forming an important landscape feature and should be used to inform the layout and landscape strategy. The design principles includes provision for retaining hedgerows and trees. The master plan is set around the existing grid of hedgerows and significant trees. Further tree/hedgerow work is required to be submitted with future planning applications, to inform layout and biodiversity matters. The removal of the sentence highlighted in para 5.49 above, is not considered to undermine the green vision for IGS and is considered appropriate given that the outcomes of more detailed design and tree/hedgerow survey work may identify some trees / hedgerows as not being suitable for retention. Full landscape effects will be considered within Environmental Impact Assessments.

Consultees

- 3.48 Appendix 5 includes a summary table of comments received from a range of statutory consultees, parish councils, neighbouring local authorities, interest groups

as well as our local design review panel (Ipswich Conservation & Design Panel). Some issues raised are already covered in the subject matters discussed above. Others, however, are specific to the respondents' field and are discussed in the following section.

- 3.49 Suffolk County Council has responded to the public consultation of the draft SPD, and has noted that most of their comments from previous consultation stages have been taken into account. However, it is noted that whilst the document contains more information, the vision and objectives could be clearer and the document should set out how the sustainability appraisal process has influenced the choice of spatial option. It is also stated that there is a role for the SPD to raise the issues of traffic and air quality, highlight the relevant policy and state how these very important aspects will be considered by the authority, as well as how they may impact design / layout of the development. The implications for traffic and air quality are recognised within the SPD. The Transport Strategy sets out the expectations in this regard and opportunities for sustainable travel. The overall layout has been set out as a consequence of trying to achieve walkable neighbourhoods and well connected developments. Further investigation into air quality and traffic impacts is required by the SPD and implications for the proposals considered.
- 3.50 There is also some concern raised with regards to the vision and core objectives, which are said to incorporate more physical and qualitative features, weakening the prominence of the objectives and suggests that those excluded from this chapter are not such a priority. Sustainable transport, is cited as an example, which is not included in the vision where priorities are established (paragraph 2.1 does not include sustainable transport as a priority). The Vision and Core Objectives for IGS are based over four themes which are considered to give emphasis to the key requirements and basis for the development of IGS which is grounded in national and local policy. Sustainable transport is specifically referenced within the connectivity theme and aspects which encourage sustainable transport is referenced in the other three themes. Paragraph 2.1 includes a list of garden city principles from a Town and Country Planning Association (TCPA) publication which are considered as a starting point for the IGS vision, which is set out in more detail in remainder of the chapter and includes sustainable transport.
- 3.51 Suffolk County Council welcomes the continued recognition of education provision. It also states that the reservation of sites for the secondary school is also reassuring and as noted in a previous response a new secondary school is needed by 2020 and the SPD should support the earlier release of this site if needed. Following further discussion on the point of reservation sites for the secondary school, in some respects it is considered that it is not reasonable or logical to require reserve sites on the two neighbourhoods (Fonnereau and Henley Gate) in addition to the preferred Red House farm site, but in accordance with latest legal advice, continued recognition will still be needed that provision of a site to accommodate a secondary school may still be required in either Fonnereau or Henley Gate in the event that the Red House site cannot be secured in the necessary time frames. Alternative purchase options could also be available if the Red House Farm site does not come forward soon enough and these should be pursued in order to secure the site. A change to the SPD to that effect is considered appropriate and has been discussed with Suffolk County Council.
- 3.52 Suffolk County Council also noted that the provision of recycling facilities within neighbourhoods (such as local centres) could be expressed more clearly than in Para 2.64, as well as the Council's requirements relating to heritage and archaeology. In response it is noted that these matters are highlighted within the SPD and the

applications will still need to accord with the relevant planning policies and advice from statutory consultees at the time the planning applications are submitted. With regards to waste and recycling this is highlighted in the objectives section and is expected to be further developed through submission of strategies required in chapter 10 (waste management plans and sustainability assessment which includes topic on waste). Similarly for heritage and archaeology these are specifically noted in the SPD as issues which need to be addressed and further detail is required through Archaeology Assessments and Heritage Statements as required in chapter 10 of the SPD.

- 3.53 Comments have been raised by residents and consultees with regards to the early provision of the Country Park, and in some comments it was highlighted it should be provided prior to the first phase of the IGS development commencing. This was a point raised in particular by Suffolk Wildlife Trust, as well as Suffolk Coastal who commented that they would support its early provision. The Country Park delivery is associated with the adjoining Henley Gate neighbourhood and on that basis the trigger for this is linked to the occupation of houses in this neighbourhood. The trigger is currently set at 300 dwellings, although it is proposed to increase this to 500 dwellings based on viability factors as set out in paragraph 5.33 of this report. It is however proposed that tree planting and landscaping details are agreed and commenced at an early stage in the development of Henley Gate which would assist with the establishment of trees and natural landscaping by the time the Country Park is opened.
- 3.54 The Ipswich Conservation and Design Panel raised some quite specific comments relating to looking at maximising south facing dwellings and raised the concern of the sustainability measures being vulnerable to cost pressures. In this regard it is highlighted that 'Climate Change' is a key theme and core objective within the SPD and includes measures relating to code for sustainable homes, renewable energy sources and passive design measures. The Core Strategy sets the policies on the sustainability measures required and viability considerations. Achieving suitable code levels may require maximising south facing roofs where possible, but this will be assessed at a detailed stage.
- 3.55 The panel also noted that the improvements to Westerfield Station are too vague. Possible improvements are noted in the Transport Strategy included in the SPD, but the actual details related to what will be required and appropriate will need to be considered in light of detailed transport assessment results and discussion with relevant parties including Network Rail. Also on the topic of the transport implications related to the SPD, the need for an East-West bus link was noted by the panel. Again the potential for this is identified in the SPD but will need further discussion following consideration of detailed transport assessment information.
- 3.56 Suffolk Wildlife Trust noted in their comments that the recommendation of restoring the area of land around Red House Farm to parkland was not taken up in the SPD which in their opinion is regrettable. There is much included in the SPD which recognises the importance of the buildings and natural features associated with the Red House Farm site, and although the parkland would not be restored, the protection and adequate buffering of these trees, along with the hedgerows across the site, should be secured on the basis of the SPD. Requirements for future planning applications includes requirement for an Arboricultural survey and Landscape Plan, as well as a Heritage statement which is required to have particular regard to setting of Red House Farm complex. It is expected that together these documents will assess the tree and hedgerow quality and contribution to landscape setting in this particular area and set out the protection measures to retain them. The

importance of these trees / hedgerows are noted in the SPD and will be expected to be addressed accordingly in any future planning applications.

- 3.57 The Church of England Diocese of St Edmundsbury & Ipswich propose that an embedded faith worker could facilitate the community development of IGS and intend to offer to manage a future community facility, possibly in partnership with other ecumenical partners. The points raised are recognised as having potential to assist the strategy for community development of IGS. For the purposes of the SPD however such details have not been specified beyond recognising that community development is an important factor and will need to be set out in a strategy submitted with any future planning application (the draft SPD para 8.2 and Table 1 also expects a Community Development Officer to be established through planning obligations). Similarly the desire to bid for schools within IGS is noted but is not addressed in the SPD as it will be subject to later discussions once details of the schemes progress.
- 3.58 Comments sent on behalf of NHS East of England, objected to the proposal contained within the SPD, that the District Centre would deliver a 'reserved site for a health centre'. It is concluded that a serviced site with contributions is now seen as the optimal solution for the delivery of a health centre, rather than a reserved site as currently specified in the draft SPD. It is therefore advised that in order to ensure new primary health care capacity is delivered for IGS residents, a site of sufficient size to meet the related health care needs is provided, along with developer contributions in order to bring forward a health centre at an appropriate point by an NHS body. It has been ascertained that based on the population arising from IGS, a 0.2ha sized site is an approximation of the area required at this stage to accommodate 6 GPs, which would include parking, drainage and landscaping. The impact on health services will be further assessed as part of the Environmental Impact Assessments required to accompany planning applications for the site.
- 3.59 Mid Suffolk District and Babergh District Council's raised a number of points and concerns with regards to future development of the site. Many related to traffic which are mainly covered through the transport section above. Specific points were however also raised regarding the potential restricted use of the proposed railway bridge and its impact on traffic flows, as well as a request for traffic calming measures for certain roads close to the site within the Mid Suffolk boundary. On these points it is again for the outcomes of the detailed transport assessment to determine what exact mitigation is necessary for the IGS developments and surroundings. Provision is made in the SPD that traffic calming in other locations other than those specifically identified will be required and the restricted bridge is a suggestion in the transport strategy which would need to be subject to further investigation to fully understand its impacts on traffic. The traffic implications of employment sites is recognised in the SPD and would need to be explored further in the detailed transport assessment. Paragraph 6.17 identifies potential for bus routes to link main employment sites in the town which will be investigated further in the context of future transport assessments.
- 3.60 Public Health Suffolk - Suffolk County Council, commented on the SPD and for the most part the points raised are covered in the above topics. There was however specific mention of the school being located in an ASTSWF (Areas Susceptible to Surface Water Flooding) designation and concern for this decision even with the SuDS strategy. In producing the SPD the site for the secondary school has been carefully considered in the context of the ASTSWF, the Environment Agency have not raised any concern and the inclusion of school playing fields in this area would

assist with the overall drainage strategy. It is considered that the school buildings can be, subject to details, suitably located in the suggested area.

- 3.61 English Heritage comment that although the SPD identifies the listed buildings in proximity to the site, no reference is made to these designated heritage assets elsewhere in the SPD. English Heritage also make reference to the Sustainability Appraisal report which recommends changes to the core objectives in order to set out a clear commitment to conserving the setting of heritage assets and ensuring the wider historic landscape is protected and cultural heritage is taken into account. These points have been considered and it has been agreed that the SPD could be improved in terms of ensuring these matters are fully considered. An additional paragraph has therefore been added within the 'Character' theme of the vision (page 22-23) which highlights the contribution the historic and cultural heritage of the surroundings can make to establishing character within IGS and setting out an objective to conserving the setting of listed buildings and taking into consideration the wider cultural heritage of the area.
- 3.62 Sport England have raised some concern with regards to the sports provision identified and how this will meet needs, particularly where provision is to be a shared facility with schools. They have concluded that further work will need to be carried out to develop a strategy for the provision, design and delivery of all indoor and outdoor sports facilities, which they would be happy to assist on. As part of the planning applications to be submitted further detailed work building on the SPD with regards to sport facility needs and provision will be required. The strategy for sport provision can be developed in consultation with Sport England and included as part of the Infrastructure Delivery Plan.
- 3.63 Natural England whilst welcoming the inclusion of the Country Park, note that the Ipswich Core Strategy Appropriate Assessment identified the Country Park as an essential mitigation requirement to divert additional recreational pressure, associated with development, away from European sites such as the Stour and Orwell Estuaries SPA and Ramsar site, and thus avoid adverse effects on these sites. It is advised by Natural England that this basis for the Country Park requirement should be specified in the SPD and that it will be appropriately designed and managed to ensure that it will deliver the mitigation requirement identified in the Appropriate Assessment. This has been agreed and suggested wording has been added to paragraphs 3.14 and 4.10.
- IGS Developers
- 3.67 The two main developers (Crest and Mersea Homes) for the IGS site have commented on the SPD. Both have given their broad support for the SPD, whilst raising some concerns regarding certain aspects of the draft. These are summarised in Appendix 7 alongside specific responses from IBC officers to address their points.
- 3.68 Crest raised queries over the locations of district and local centres, as well as details of the railway bridge. All have been addressed in more detail in Appendix 7. No changes are proposed as a result of the comments made in relation to the local and district centres as the locations of these have been fully considered and are logical to the wider objectives of the IGS vision. Consultant advice on retailing requirements/location was undertaken at an early stage in the SPD preparation. Greater clarity on the railway bridge being for all modes of transport is however a change which has been incorporated in response to the point raised by Crest.
- 3.69 One of the most significant points raised by Crest related to infrastructure delivery and viability across the IGS area. On this matter it is noted that the SPD requires an

Infrastructure Delivery Plan to detail further how infrastructure will be delivered and funded between landowners / developers. The question of viability and balance of profitable uses across the SPD area is acknowledged and is intended to be addressed through the Infrastructure Delivery Plan which sets out the comprehensive delivery of required infrastructure by landowners. This fundamental matter remains to be resolved.

- 3.70 Mersea Homes raised substantially more detailed concerns in comparison to Crest, although they noted their broad support for the vision and objectives, and the principle of comprehensive planning. A fuller summary of the points raised are included in Appendix 7, many are related to a concern that the SPD is not flexible enough and some terminology is too prescriptive. There is also some concern with the terminology used and implications for adherence to certain requirements, the specific examples referenced have been reviewed and it is considered that the SPD is sufficiently flexible in its approach and does allow for individual applications, whilst ensuring that the overall standard of development is not diminished. Arguments for the exemplary requirement for sustainable development to be amended to good practice, is not agreed with and in the interests of setting a high expectation for standards the exemplary requirement will remain.
- 3.71 Some points raised have been considered and it is concluded do require some amendments to the SPD, to ensure compliance with policy and clarify expectations. These changes include a revision to paragraph 3.16 which relates to public open space within residential areas and the “requirement” that an additional 10% of land within residential areas shall be provided as public open space in addition to the open space types set out in paragraph 3.15. A change has been included to replace “requires” with “seeks”, which better reflects core strategy policy DM29. It has also been agreed that more appropriate words for para 4.22 would be used to reflect the overall aim to ensure developers are expected to contribute towards strategic infrastructure as opposed to the current wording which states ‘jointly liable’.
- 3.72 Concerns regarding the level of detail required at certain points of the application process and the additional documents included in the planning application requirements which do not appear on the Council’s validation list, have been considered however it is concluded that in both instances given the nature, complexity, scale of development and in the interests of comprehensive planning, the requirements for the level of detail is justified. Similarly the trigger points identified for the infrastructure is considered necessary to set out a framework for ensuring the necessary infrastructure to support the development is provided. The indicative nature of the triggers is noted in the supporting text and that the planning application details such as the Infrastructure Delivery Plan may indicate alternative trigger points which can be agreed with the Council.
- East of England Design Panel
- 3.73 As part of the public consultation exercise for the draft SPD it was considered an appropriate time to have an external design review in order to independently review the SPD document and ascertain whether the approach taken is logical and robust enough to deliver the vision and objectives identified.
- 3.74 The external design review was undertaken by the East of England Design Panel who are managed by Design South East a not-for-profit organization. ‘Design South East’ is the trading name of the North Kent Architecture Centre Limited, which is a Company Limited by Guarantee. The company is governed by a voluntary board of Directors appointed openly from the public and private sectors. Details on the Directors are on www.designsoutheast.org. Design South East developed the South

East Design Panel in 2002 and have managed the South East design review service since that date. Following the closure of Shape East in December 2013, Design South East formally took over the management of the East of England Panel and the delivery of design review in the East of England. Like the South East Panel, the East of England Panel is managed by Design South East, and the advice given is that of the Panel rather than Design South East.

- 3.75 The comments by the external design review panel have been reviewed and comments have been received from our local design review panel and Crest on their comments. The panel's full response, summary of the points raised by the panel together with an IBC response, together with Ipswich Conservation and Design Panel's and Crest's letter of response can be viewed as part of the appendices to the Council report.
- 3.76 In summary the external panel recognised that IGS is an ambitious project with considerable potential. It was concluded by the panel that the draft SPD is fundamentally sound in its scope and purpose, although the masterplan itself is not yet showing how the garden suburb will be anchored to the town as a whole, rather than simply being an appendage to it. It was also suggested that it would help if the masterplan were presented more clearly, distilling and strengthening the main design moves to distinguish them from the lesser supporting elements.
- 3.77 Crest have also submitted representations in response to the panel's comments, and they advise that they concur with the view expressed by the panel that the SPD requires further refinement and joint working to achieve a robust policy context against which development proposals can be assessed and agreed. Crest conclude that a final SPD will provide a strong basis for the comprehensive delivery of the vision for the IGS and ensure the provision of key infrastructure is not compromised. This view is agreed with but until the Core Strategy Review is adopted (predicted to be October 2015), the SPD cannot be fully adopted. For that reason the SPD has been adopted as interim guidance in the intervening period.
- 3.78 With regards to the concern raised that the masterplan does not show how the garden suburb will be connected to the town, this is a clear part of the vision whereby the 'community' and 'connectivity' themes of the vision, highlight the objective to be well-integrated and being accessible to existing residents. This objective is then followed through in the remainder of the SPD document which sets out the basis for how the developments can be integrated with the town and the documents which are expected to develop these opportunities. For instance the Placemaking Strategy (figure 6 of the SPD) identifies different edge treatments expected to address different land uses, including existing residential areas and roads within the town which adjoin IGS, the detailed design would be expected at planning application stage. The importance of IGS making connections and integrating with existing communities is highlighted in Chapter 8, which sets out the expectation that connections and integration with adjacent neighbourhoods will be considered further as part of the Community Development Strategies. The design detail is also expected to make reference to existing characteristics of the housing in Ipswich (para 5.3) and the transport strategy, which is partly based on encouraging attractive links to incentivise other modes of transport to the car, which would be informed by the transport assessments to be submitted.
- 3.79 Following on from this it is concluded that there are certain aspects relating to the development of IGS which require further investigation. Some of these are recognised in the SPD such as the community development strategy in chapter 9 of the SPD, as well as design coding and details of the open space strategy.

- 3.80 It has been concluded that as a result of the points raised, certain changes and amendments are required. These include: recognising that opportunities exist for allotments and food production areas within blocks and alongside railway lines; identifying the potential for cycle and footpath links to Westerfield Railway station; and amendments to emphasise the rail bridge connections in order to deliver sustainable development.

Sustainability Appraisal

- 3.81 Appendix 8 of this statement sets out the comments received in relation to the SA/SEA along with a joint response from Hyder and IBC on the points raised. Some of the concerns raised related to issues outside of the IGS site and expected more detail to be contained with the SA. On these points it is noted that the SA/SEA is a strategic assessment of the SPD and is not intended to be a detailed assessment of sustainability issues, these will come in at planning application stage through EIA. There were also concerns raised related to other data / evidence bases not being used to provide indicators. As a general note not all possible evidence can be identified here, nor is it helpful to do so. The SA/SEA has also been through a scoping stage and at that stage comments relating to indicators and evidence base were addressed and agreed. It is recognised that other evidence bases exist which could provide further results on the indicators but at this level a small range of data which is already measured and available, provides the best overview for a particular issue.
- 3.82 Hyder have advised that in their opinion the SA/SEA does not need to be revised but an addendum to the document has been produced to cover the SPD changes which have been included in the interim version of the guidance.

Representations at Executive Committee by Ben Gummer MP

- 3.83 Mr Gummer provided the following statement in advance of his appearance at the Council's Executive Committee. His statement was that he:
- Welcomes Borough's determination to build houses.
 - Welcomes Borough's aspirations for the scheme.
 - Welcomes changes made to draft Masterplan.
 - Welcomes pace of Borough's process.
 - Notes that changes still need to be made to Masterplan, which is still at interim stage.
 - Notes additional improvements that could be made to make development more sustainable.
 - Notes planning application made by Mersea Homes.
 - Notes that final draft of Masterplan not yet complete.
 - Notes that there are still confusions in interim draft.
 - Asks whether recommendation that Masterplan be put to Full Council be delayed until final draft of plan be completed.
- 3.84 It was agreed at the 14th August 2014 Executive that representations submitted thereafter by Mr Gummer or other councillors would be considered and included within this report to Council. The above points are largely addressed below with the exception of the last point. In the case of that point, the two over-arching reasons why it was recommended to proceed with the interim adoption of the masterplan was that (a) it was considered that it was of sufficient quality to be adopted; and (b) because of the submission of the current application for the majority of the Fonnereau site, the interim adoption would enable the SPD, as amended, to be a material consideration in the assessment and determination of the current application.

Representations following Executive meeting, from IBC's Conservative Group and Ben Gummer Member of Parliament for Ipswich

- 3.85 As a preface to their comments, IBC's Conservative Group and Ben Gummer MP note their support for the construction of new houses in Ipswich and support a scheme for the Northern Fringe that is of high quality and adequately served by good infrastructure, although it is highlighted that the current masterplan does not anticipate such a development.
- 3.86 A number of points raised relate to Transport, specifically Road Access; Road Infrastructure; Fonnereau Way; Cycling; Bus Services; and Position of Secondary School. In addition to this concerns were also raised with regards to Flooding & Topology; Housing Design Quality; Affordable Housing Mix; and Process. Each matter is discussed in the following paragraphs.
- 3.87 Road Access: Concerns are raised that the Masterplan envisages car traffic only accessing the new development via access points on Westerfield Road and upper end of Henley Road. The restricted number of access points is thought to lead to bottle necks on an already congested road network and also means that the new development is not sufficiently 'knitted-in' to the existing developments.

Response-Limiting the points of vehicular access is identified in the SPD as a way in which traffic impact can be more effectively managed and fed onto the existing road network by taking into account existing traffic levels on the network. The number of access points into the site are limited in terms of access for private motor vehicles but a greater number of access points are proposed for other forms of transport and will enable suitable permeability for adjoining residents to access and connect into the site. This is as required by SCC Highways.

- 3.88 Road Infrastructure: Comments are made relating to more consideration needing to be given to new road infrastructure being built prior to development taking place on this site.

Response -The SPD has been based on the view from Suffolk County Council as Highway Authority that new road building is not necessary to accommodate the vehicles generated by the proposed housing, providing robust alternative transport modes are also developed. At this point in time there are no proposals or indication that substantial new road infrastructure will be built. Currently we are faced with a housing need, which as a Council we have a duty to address. It is therefore not considered reasonable or appropriate for the policy position and development of the site to be delayed further in order to reconsider road infrastructure.

- 3.89 Fonnereau Way: The submitted comments note that this is a historic route and more should be made of it within the SPD so that it provides a new green walking link from Christchurch Park, through the development, straight north to the countryside beyond.

Response-The SPD highlights Fonnereau Way as a long established public footpath which forms a route between Christchurch Park and Westerfield village. Paragraph 4.7 of the SPD identifies Fonnereau Way as a part of the landscaping and green infrastructure strategy which is critical to the success of achieving a garden suburb character. As part of that it notes that the route must be enhanced. Fonnereau Way is also recognised in para 4.44 and figure 11 of the SPD as a key feature of the access and movement strategy, and as an important north-south connector. It is also highlighted as a distinguishing feature of the Fonnereau neighbourhood in chapter 5 of the SPD and is included into the street cross sections to show how the route could

be enhanced and incorporated alongside new development. Overall it is considered that Fonnereau Way as an important connection has been identified, together with the requirement for its retention and enhancement, details of how this could be designed and finally a requirement within the infrastructure tables in chapter 10 for this to be undertaken.

- 3.90 Cycling: The comments state that it is found to be surprising that there is no serious consideration for new cycle 'super-highways' into the town centre. It is thought that infrastructure to make cycling easy and safe is not there and this is an opportunity to correct this. However serious consideration and detailed examination of this has not been included in the Masterplan.

Response-The fact that there is scope to improve cycling infrastructure around the town is not disputed. The SPD is very clear on the objectives for improving sustainable travel from the site to the town centre. Commentary is given on the potential routes to the town centre, but these need to be more informed by detailed transport assessments which would be undertaken at the planning application stage. Within that more informed framework, a clearer picture of cycling needs generated by the development can be concluded and the necessary mitigation i.e. connection routes can be proposed. In terms of wider cycle connections around the town this needs to be part of a broader strategy taken forward by Suffolk County Council in order to ease access around the town.

- 3.91 Bus Services: The comments highlight that bus services cannot be relied upon solely as the means of delivering a good sustainable travel plan, and the example of Ravenswood which has had a cut in bus services is cited.

Response-The SPD sets out a range of incentives to encourage sustainable travel within the transport strategy (chapter 6 of the SPD) and does not rely solely on bus travel. Bus travel is however an important part of the strategy and the viability pressures of provision, particularly in the early phases are recognised. Hence paragraph 6.20 of the SPD and the infrastructure tables within chapter 10, identify the need for phased delivery plans of bus services, and possible subsidy and temporary services at the initial phases.

- 3.92 Position of Secondary School: The comments state that the position of the secondary school raises questions and that a more central location would be more logical in order to encourage cycling and walking. Concerns raised with present position which only has one access road serving it. Also in relocating the school it could provide a semi-green barrier to existing residents' houses. As a minimum it is requested that the impact of the school position on travel patterns is reappraised and the results published.

Response-The SPD has taken forward the position of the Secondary School on the Red House site, following an Issues and Options assessment which looked at different distributions of land uses including the Secondary School being located in each of the three neighbourhoods. This was then consulted upon and on the basis of the feedback received Option 2 which identified the Secondary School on the Red House site would form the basis of the SPD. The draft SPD was approved at Executive in November 2013 for further public consultation. It is also worth noting that the location of the Secondary School is now supported by Suffolk County Council as education authority.

The Red House site for the school was taken forward partly due to the phasing of sites and when they would come forward for development as well as accessibility.

The Red House site was considered to have more certainty in terms of it being available at the time it was required for the School in comparison to the Ipswich School site. The SPD does allow for alternative sites for the Secondary School to be considered if the phasing of development sites no longer accords with when a Secondary School is required.

- 3.93 Flooding and Topology: The comments note that whilst the Council has secured its own flooding advice, there are still concerns that this potential threat to development has not been properly assessed. Independent advice has ascertained that the layout of the scheme could exacerbate flood risk, as it does not properly respect the topology of the site. It is commented that no proper or detailed topological studies appear to have been undertaken and no decent topological maps are included in the document. The independent advice taken has suggested that some re-orientation to the plans could reduce flood risk, without jeopardising density levels and with increased amenity for residents.

Response-The SPD is based on a significant amount of background work/technical evidence which was undertaken to identify the potential options for the Masterplan and an assessment of which one was most appropriate to take forward into the SPD. This was undertaken and reported as part of the 'Issues and Options Report 2012'. This report includes an assessment of topography and other site features and context. The merits of the option eventually chosen and why, is explained on pages 12-14 of the SPD. The SPD includes reference to the background work and web links to the relevant documentation at paragraphs 1.18 and 3.3 of the SPD.

One of the recommended changes to the SPD is the inclusion of the Preliminary SuDS Strategy, which includes a contoured plan on page 5 of the strategy and shows early pre-development flood risk modelling results. The SPD includes on page 33, a constraints plan, with areas susceptible to SW flooding shown.

On the basis of this background work, open / green spaces have been generally shown in valley bottoms. Formal green areas are shown to be connected by linear spaces along the lines of field boundaries, and creates a network providing a naturally draining basis for the Sustainable Urban Drainage Masterplan. There is the potential for this to be improved and the quantity and location of green spaces may need to be looked at again in the light of detailed drainage assessments to be undertaken with the planning applications. In particular more detailed consideration needs to be given to the 'at source' SuDS design which is advised in the Preliminary SuDS Strategy and shown in the secondary and tertiary street cross sections. These smaller scale SuDS when located in line with natural contours of the site, are advocated as the most efficient way of maximising the water storage capacity. This is a level of detail which is not shown in the more strategic plans in the SPD, such as Figure 13 (the Illustrative Masterplan), but are shown in the more detailed aspects of the street cross sections and Preliminary SuDS Strategy. Overall however it is considered that the broad locations of the land uses are appropriate and have taken account of the topography of the site.

- 3.94 Housing Design Quality: It is commented that the standards set are generic, weak and will not achieve the high quality that IBC wishes to achieve. More deliberate statements on housing design quality are considered necessary which cite exceptional developments elsewhere in the UK and Europe. Accordia and Harlow Be are specifically mentioned.

Response-The SPD has established firm baselines for the creation of a Garden Suburb. These address rural edge issues as well as the placemaking qualities expected of a modern residential development. In particular, there has been an emphasis from the outset on the conservation of existing landscape assets – primarily hedgerows and field trees – and the historic buildings on the site (Red House Farm). The SPD goes to some lengths to identify and ensure the protection of these features. In addition, a network of open space has been established which helps protect the setting of Fonnereau Way, and retains the most attractive northern edge of the site as a Country Park. There are several additional open spaces which will add to the garden suburb setting, and provision for allotments.

The concept of three ‘neighbourhoods’ underpins the urban design of the site. The SPD is clear in setting out the importance of these locations in generating distinctive layouts and built form. The emphasis on retaining field boundaries has produced a gridded street pattern and an emphasis on perimeter block design in the SPD. Between the blocks, a clear hierarchy of street types has been established (including, in the latest revision, secondary and tertiary streets). Plans and cross sections show how urban blocks will contribute to the garden suburb setting.

The SPD is not a pattern book for design – that level of detail belongs to the Design Codes which are required by the SPD at the detailed application stage. The precedents quoted - Accordia in Cambridge and New Hall, Harlow – are the product of exceptional circumstances which unfortunately do not apply to the garden suburb site – in Cambridge exceptional property values and a local housing market responsive to innovative architectural design, in Harlow a single private landowner willing to divide their site into smaller development packages and encourage high quality architectural design. Within the market and land value / ownership limitations on the Ipswich site, the SPD makes a strong case for site responsive design and the negotiation of design quality.

- 3.95 Affordable Housing Mix: It is commented that the Masterplan suggests affordable housing will be a smaller proportion at the beginning of the scheme, with the greater weight being provided towards the end. This has generated concern that it will lead to an imbalanced development, with some areas with greater numbers of social housing and others with fewer, leading to ‘ghettoisation’ of social tenants. There is also concern that not enough thought has gone into alternative models of affordable housing such as shared equity, rent-to-buy and housing association.

Response-The SPD recognises that in the light of provisions within the NPPF relating to the viability and deliverability of proposed developments, flexibility around the provision of affordable housing may be necessary to deliver a wider package of infrastructure to support a phase of development. The quality and type of affordable housing levels will be secured through each neighbourhood and phasing plans, at the planning application stage. The SPD and associated planning policies would allow for alternative affordable housing models to be considered provided they meet identified housing needs.

- 3.96 Process: Within the comments submitted, it is also asserted that Ipswich Conservatives have made previous points which have not been incorporated such as a ‘green barrier’ being placed between the new build and existing housing, and alternative provision being made in the District Centre for local traders using a farmers market model.

Response -With reference to a 'green barrier' this has been incorporated within the Place Making Strategy (Figure 6 on page 49 of the SPD) which recognises that a soft landscaped area is required to address those edges where new housing adjoins existing housing. The precise detail of this landscaping will be considered in more detail at the planning application stage. Whilst, this soft landscaped edge solution may not go far enough for some to address this concern, it is a balanced approach which will provide an appropriate boundary treatment. The siting of public open space as a 'green barrier' for instance would result in public areas to the rear of housing which would represent unsatisfactory urban design whereby public open spaces are created that lack appropriate levels of surveillance and security. A balance has to be struck between integration and separation of new development.

With reference to the District Centre the requirements for this are flexible enough to allow for a range of smaller unit sizes and paragraph 3.30 of the SPD specifies that the design of the District Centre incorporates a public space which is capable of accommodating events and outdoor activities. This therefore allows for the provision of markets.

- 3.97 It is also stated that repeated representations made by Ben Gummer MP and on behalf of residents, have not been responded to and no changes have been made to the Masterplan. The MP's earlier comments on the Draft SPD were reported in the August 2014 Executive report, where it was concluded that no changes were considered appropriate or necessary as a result. It is noted that a subsequent point has been made following the Executive report, regarding the illustrative figure on page 18 of the SPD which has been amended following the Executive meeting.
- 3.98 Concerns were raised with regards to the consultation undertaken. It is stated that as residents' concerns about traffic, design standards and flooding have received little or no response, it is concluded that the consultation was neither thorough nor entirely genuine.

Response -On this point it is reiterated that many of the comments we received related to the 'in-principle' concerns residents have regarding the building on the Ipswich Garden Suburb area. Other matters which were frequently raised related to transport or drainage issues. On many of these points, the role of the SPD is to set the framework which steers and guides the future development of the area. The principle of developing the northern fringe was established in 2011 through the Core Strategy. Not all the answers on drainage design and transport mitigation are available as yet, nor would it be appropriate to incorporate that level of detail within the SPD at this stage, in the absence of development details which the developers will determine. There has been a significant amount of strategic modelling and assessment undertaken to ascertain whether the area could be developed and to determine a scope for the quantum and type of development which could be accommodated. The SPD sets out the framework, from which future planning applications are expected to undertake further detailed assessment work using more informed assumptions of housing types, development sizes, delivery rates etc. The concerns residents have, have been considered and the consultation has been very useful in highlighting those matters of most concern to local residents so that we can seek to ensure they continue to be followed through and addressed during the planning application process. In addition to this, there has been significant engagement with external parties during the creation of the SPD and it is noted that Atlas supported the process undertaken. On this point it is therefore strongly disagreed that consultation was neither thorough nor entirely genuine.

- 3.99 It is also noted that with regards to presentation, the Masterplan shows a lack of thought and care that is required of a scheme of this size and explains why so many basic errors around infrastructure and design quality have been made. Two examples are given:- Misleading artist impression of lakes and a cricket pitch located on a slope.

Response-The artist impression has been amended to reflect a more typical appearance of such SuDS features. In reference to the cricket pitch this was intended as an example of the leisure and sport potential for the site. The reference to the cricket pitch has been removed from the illustrative masterplan and the area left as green space to be considered for other leisure/sporting uses as appropriate.

- Representations following Executive meeting, from IBC's Liberal Democrat Group
- 3.100 These comments raise major concerns relating to traffic. In particular it is stated, that they do not believe that the traffic exercises carried out have been sufficiently rigorous or that the impact has been measured on the existing road network in the Borough and surrounding villages. It is also noted that the Highway Authorities' response is insufficient and shows a lack of modelling or regard to vehicular traffic movements in the north of Ipswich in the future. The long term economic and environmental impacts are expected and are considered to have been ignored. In addition to this the lay of the land appears to have been ignored in much of the planning of the site and if there is work still to be done this should not be rushed by the developer.

Response-The SPD and allocation of the site for housing, is based on SCC strategic traffic modelling, to determine the likely impacts and mitigation required for large scale housing in this location. This was considered an appropriate level of assessment for that stage of policy work. A next level of more detailed transport assessments will now be required with the planning applications, which will be more informed by the specific details proposed in the developments as well as how the necessary improvements for transport can be included in the proposed developments and how they will be funded and delivered.

In terms of the lay of the land, it is not clear in what respects this is thought to have been ignored. The Masterplan is intended to take account of existing trees and hedgerows and therefore, maintain the existing pattern of field divisions across the site. In areas susceptible to flooding, green and open spaces are shown. The SPD has been under discussion and in the process of being produced for over two years. It is a well-considered document that takes account of the site's features and sets out an ambition and basis for proposals to be taken forward. It is for these reasons that the SPD has been recommended for approval rather than developer pressure, although the submission of a planning application does highlight the need for greater weight being attributed to the SPD sooner rather than later, so that it can be effectively used in the determination process. With regards to criticism over the lack of detail, this will be forthcoming with the next stage of planning application submissions.

4. CONCLUSION TO RESPONSES AND AMENDMENTS INCORPORATED WITHIN INTERIM GUIDANCE VERSION OF SPD

- 4.1 In response to the comments made and further consideration of the draft SPD the following changes to the SPD were therefore proposed and incorporated into the draft SPD to produce the interim guidance version which has been adopted:-

- a) Foreword by Portfolio Holder – To reflect the recommended change in status the foreword will be updated and will be clearer on some of the concerns raised in relation to the present draft. The updated foreword covers the following points:-
- Background to the site allocation and implications of the Core Strategy Review;
 - Importance of the SPD and why it is necessary;
 - Role of ‘garden suburb’ principles and overview of what is proposed for the site
 - Features of the site and connections outside the site;
 - Consultation undertaken and main concerns received;
 - How concerns raised have sought to be addressed in the interim guidance;
 - Role of interim guidance and next steps for full adoption.
- b) Page 18 - Amended illustration to show the largest of the three blue areas (drainage ponds) as a grassed area rather than full of water.

- c) Page 23 – New paragraph inserted to reinforce the consideration of listed buildings and cultural heritage within the vision and objectives. New paragraph reads:

New paragraph 2.26

Proposals should recognise and take account of the wider historical and cultural heritage of the site. This includes identifying and taking opportunities to conserve the setting of listed buildings which are in close proximity to the site.

- d) Para 2.50, page 26 – Amendment to reinforce the need for bridges in the interests of sustainability of the site and use by sustainable modes. For comparison, included below is revised version:-

Revised paragraph 2.50

In the interests of securing effective connections between all neighbourhoods and creating sustainable communities which have easy access to a full range of services and community facilities in each neighbourhood, a new road bridge over the Ipswich to Lowestoft / Felixstowe railway line will be provided to ensure a high level of connectivity between different parts of the site for various modes of transport including foot, cycle and bus. A new pedestrian / cycle bridge will replace the existing sub-standard at grade crossing where Fonnereau Way currently crosses the railway line.

- e) Para 3.3, Page 32 - In accordance with Counsel’s advice, the paragraph is deleted, on the basis that it is better to leave the materiality of the draft SPD to decision making, to the Council’s resolution given that this paragraph will need to be updated in the future.

Paragraph 3.3 deleted

The land use allocations shown in the Development Framework Plan (and associated guidance contained herein) in respect of the land allocated in the adopted Core Strategy for housing and associated facilities prior to 2021 can be regarded as firm guidance for any planning applications that may relate. Land use allocations relating to the remaining areas of the site should be regarded as guidance pending the adoption of the Core Strategy Focused Review, and indicate how these areas could be developed as part of a comprehensive plan.

- f) Para 3.12, Page 38 – In response to comments from the Parks and Open Spaces service reference is made to the Council’s Open Space and Biodiversity Policy. The following additional wording has been added to the second sentence of paragraph 3.12 “... **which accords with planning policy and the Council’s ‘Open Space and Biodiversity Policy’.**” The original draft and revised paragraphs are shown below:-

Draft of paragraph 3.12

In keeping with the garden suburb tradition, landscape character and green open spaces will be the key defining feature of Ipswich Garden Suburb. The Council will require applicants to demonstrate high standards for the design, specification and maintenance of all landscape elements in order to secure an appropriate quality over the short, medium and long term life of the development. Landscape strategies and landscape design codes will be expected to accompany any outline planning application(s). This will apply to all landscape areas including the public realm within the built up areas.

Revised paragraph 3.12

In keeping with the garden suburb tradition, landscape character and green open spaces will be the key defining feature of Ipswich Garden Suburb. The Council will require applicants to demonstrate high standards for the design, specification and maintenance of all landscape elements in order to secure an appropriate quality over the short, medium and long term life of the development which accords with planning policy and the Council’s Open Space and Biodiversity Policy. Landscape strategies and landscape design codes will be expected to accompany any outline planning application(s). This will apply to all landscape areas including the public realm within the built up areas.

- g) Para 3.15, Page 39 – In response to comments from Natural England a second sentence is inserted - “**The country park is required as necessary mitigation to divert additional recreational pressure, associated with development, away from European sites such as the Stour and Orwell Estuaries SPA and Ramsar site**”. The original draft and revised paragraphs are shown below:-

Current draft of paragraph 3.15

A new country park will be a defining feature of the Ipswich Garden Suburb and an integral component of the development with a high priority attached to early delivery. The country park will also play a key role in maintaining the physical separation of Westerfield village from the built up area of Ipswich and in accommodating sustainable drainage.

Revised paragraph 3.15

A new country park will be a defining feature of the Ipswich Garden Suburb and an integral component of the development with a high priority attached to early delivery. The country park is required as necessary mitigation to divert additional recreational pressure, associated with development across the borough, away from European sites such as the Stour and Orwell Estuaries SPA and Ramsar site. The country park will also play a key role in maintaining the physical separation of Westerfield village from the built up area of Ipswich and in accommodating sustainable drainage.

- h) Para 3.17, Page 39 – In response to comments relating to this paragraph not according with policy DM29, an amendment to change the wording from “**requires**” to “**seeks**” within the first sentence has been included. The original draft and revised paragraphs are shown below:-

Current draft of paragraph 3.17

In addition, the Council requires a minimum of 10% of land within the net residential areas to be provided as public open space. This space will be required to accommodate sustainable urban drainage (SuDS), retained trees and hedgerows, and to provide an attractive “garden suburb” character to each residential area. The preliminary SuDS strategy indicates that this 10% figure may need to be increased to 12% in some locations to provide sufficient space for SuDS.

Revised paragraph 3.17

In addition, the Council seeks a minimum of 10% of land within the net residential areas to be provided as public open space. This space will be required to accommodate sustainable urban drainage (SuDS), retained trees and hedgerows, and to provide an attractive “garden suburb” character to each residential area. The preliminary SuDS strategy indicates that this 10% figure may need to be increased to 12% in some locations to provide sufficient space for SuDS.

- i) Para 3.26, Page 42 – In response to comments from NHS, amendment included to reference to ‘**A reserved site for a health centre (D1)**’ in paragraph 3.26 to ‘**A health centre (D1)**’.
- j) Para 3.43, Page 45 - states that 9ha of land should be reserved in Fonnereau and Henley Gate neighbourhoods for the secondary school in the event that a serviced site identified for the preferred location for the secondary school in the Red House neighbourhood cannot be transferred to Suffolk County Council by the required time. Further discussion on the matter of having reserved sites for the secondary school has been undertaken, and it is apparent that there is a degree of agreement amongst parties that the Red House neighbourhood is the preferred site for the secondary school and there have been calls for the reference to reserved sites to be removed from this paragraph. However in accordance with Counsel’s advice alternative sites for the secondary school,

which may be required in the Fonnereau or Henley Gate neighbourhoods should still be included, in the event that the Red House site is not available when necessary. Further discussion with Suffolk County Council on the delivery of the secondary school has highlighted that this would be needed by 2021 and the lead in time for delivering the school (taking account of design, build, commission etc.) could mean that there is a need to transfer the site for the school as early as 2018 in order for the school to be operational by 2021. The need for the school will depend on delivery rates for housing which will be informed by the Infrastructure Delivery Plan. The Red House neighbourhood remains the preference in which to deliver the secondary school and it is considered appropriate for paragraph 3.43 to reference the potential that in the event that development in the Red House neighbourhood is not commenced early enough to bring forward the serviced site, alternative purchase options can be explored. The latest situation for the secondary school delivery has been incorporated through the following changes to paragraph 3.43:-

Draft of paragraph 3.43

Notwithstanding the above, the Council expects that 9ha of land will be reserved for a secondary school in both Fonnereau and Henley Gate neighbourhoods (sitings to be agreed with IBC and shown in any alternative Infrastructure Delivery Plan prepared and agreed by all landowners) in the event that a serviced site with access roads in Red House neighbourhood cannot be transferred to Suffolk County Council as Local Education Authority immediately following the occupation of 500 dwellings across the entire site, which may occur if the developer of Red House neighbourhood has not exercised their option agreement for the purchase of this land area by this point. To achieve a sustainable development of the Ipswich Garden Suburb a secondary school is required to commence no later than the occupation of 500 dwellings, and therefore the provision of alternative options would allow for any development in Fonnereau and/or Henley Gate to continue without the potential uncertainty of when land in Red House would be released. However, the secondary school in Red House remains the Council's strongest preference and this will be pursued in line with the Framework Plan where development has commenced in this neighbourhood prior to the occupation of 500 dwellings.

Revised paragraph 3.43

The preferred location for the secondary school is shown in figure 5 (Development Framework Plan) and is located in the Red House neighbourhood. It has been identified based on pupil forecasts from Suffolk County Council as Local Education Authority that a secondary school will be needed by 2021 and therefore a serviced site with suitable access and drainage is required to be transferred to Suffolk County Council by 2018. The Infrastructure Delivery Plan which is to be agreed with IBC and Suffolk County Council, and prepared and agreed by all landowners, shall set out the arrangements required (such as a land transfer agreement, service provision for the site etc.) to secure delivery of the secondary school no later than 2021, unless it is demonstrated that projected delivery, phasing and other mitigation in the form of temporary accommodation suggests an alternative timetable and is agreed between developers, IBC and Suffolk County Council. In the event that the Red House site is not available at the required time, the

Infrastructure Delivery Plan may need to identify the provision of a site in either the Fonnereau or Henley Gate neighbourhoods, whilst alternative purchase options will need to be explored by Suffolk County Council beyond the anticipated method of securing the site through a planning obligation. Notwithstanding the route of securing a satisfactory land transfer for the new secondary school, the arrangements for this must be in place prior to the commencement of development in IGS.

- k) Para 4.10, Page 58 – In response to comments from Natural England a second sentence has been inserted “**It is expected that the country park be appropriately designed and managed to deliver the necessary mitigation to divert the additional recreational pressure from other European SPA and Ramsar sites**”. The original draft and revised paragraphs are shown below:-

Draft of paragraph 4.10

Ipswich Borough Council, in consultation with relevant stakeholders, will prepare a detailed development brief for the country park prior to the commencement of its construction. It is anticipated that developers will lead on the delivery of the country park in collaboration with the Borough Council, Suffolk Coastal District Council and others. The brief will include a strategy for the delivery, use, management and maintenance of the country park. It is envisaged that the Borough Council will manage the park in perpetuity through the acquisition of the freehold.

Revised paragraph 4.10

Ipswich Borough Council, in consultation with relevant stakeholders, will prepare a detailed development brief for the country park prior to the commencement of its construction. The country park will expect to be appropriately designed and managed to help deliver the necessary mitigation to divert the additional recreational pressure of Ipswich’s growth from other European SPA and Ramsar sites. It is anticipated that developers will lead on the delivery of the country park in collaboration with the Borough Council, Suffolk Coastal District Council and others. The brief will include a strategy for the delivery, use, management and maintenance of the country park. It is envisaged that the Borough Council will manage the park in perpetuity through the acquisition of the freehold.

- l) Para 4.22, Page 62 – Wording changed in para. 4.22 (tenth bullet point) from ‘**jointly liable**’ to ‘**expected**’. The original draft and revised paragraphs are shown below:-

Draft of paragraph 4.22, tenth bullet point

In the event of there being no site-wide outline planning application and masterplan, planning applications for each neighbourhood shall incorporate a robust strategy to ensure delivery of adequate provision of sports facilities for the residents of that particular neighbourhood. Developers will be jointly liable to contribute to strategic facilities.

Revised draft of paragraph 4.22, tenth bullet point

In the event of there being no site-wide outline planning application and masterplan, planning applications for each neighbourhood shall incorporate a

robust strategy to ensure delivery of adequate provision of sports facilities for the residents of that particular neighbourhood. Developers will be expected to contribute to strategic facilities.

- m) Para 4.28, Page 64 – In response to the Design Review Panel comments, additional references are made to food production opportunities. The Landscape & Open Space Typologies identifies two potential locations for allotments but other opportunities could be found throughout IGS and this should be reflected in para 4.28. Reference to community orchards have also been removed. The original draft and revised paragraphs are shown below:-

Draft of paragraph 4.28

Areas for food production should be provided at several locations across the site. There are a number of ways in which this requirement can be met, and the Council anticipates a number of solutions will be provided:

- Allotments for rent by local people. Plots should be grouped together and should be enclosed using appropriate fencing and hedging; facilities should be in secure, accessible locations with good road access and parking facilities with power and water available. Two or three strategically located allotment sites will be deemed appropriate.*
- Community gardens, managed and maintained on behalf of the community, with community participation; and*
- Community orchards. These can be planned in linear form to line recreation routes, and can accommodate a variety of native, flowering edible fruit trees.*

Revised paragraph 4.28

Areas for food production should be provided at several locations across the site. There are a number of ways in which this requirement can be met, and the Council anticipates a number of solutions will be provided in locations that are not only noted in Figure 10 but potential opportunities for the incorporation of food production areas within blocks and maximising the use of all marginal land along railway lines will be explored. Solutions to meet the areas for food production could be met in a number of forms, including:

- Allotments for rent by local people. Plots should be grouped together and should be enclosed using appropriate fencing and hedging; facilities should be in secure, accessible locations with good road access and parking facilities with power and water available. Two or three strategically located allotment sites will be deemed appropriate; and*
- Community gardens, managed and maintained on behalf of the community, with community participation.*

- n) Figure 11 (Access and Movement), page 71 – To address concerns relating to connections to Westerfield Rail Station, figure 11 has been amended to show potential cycle / footpath connections beyond site boundaries to Westerfield Rail Station.
- o) Para 4.49, Page 73 – In response to comments raised on drainage and in consultation with IBC Drainage Engineer, the following has been inserted at end of paragraph **“The Preliminary SuDS Strategy can be viewed at Appendix 5”** and remove **“insert link to IBC SuDS Strategy when available”**.
- p) Para 4.50, Page 73 – In response to comments raised on drainage and in consultation with IBC Drainage Engineer, the following has been inserted at the end of the second sentence **“..., including the drainage route option chosen to underpin a drainage strategy and the capacity of the SuDS provided in the residential streets”**. The original draft and revised paragraphs are shown below. The latter also includes reference to maintenance arrangements

Draft of paragraph 4.50

Figure 12 shows only the strategic SuDS, which have been allocated to the most likely locations based on topography and engineering judgement. The final location and sizes will depend on more detailed analysis and design. Importantly open space will be required along all the main valley bottoms.

Revised paragraph 4.50

Figure 12 shows only the strategic SuDS, which have been allocated to the most likely locations based on topography and engineering judgement. The final location and sizes will depend on more detailed analysis and design, including the drainage route option chosen to underpin a drainage strategy and the capacity of the SuDS provided in the residential streets. Importantly open space will be required along all the main valley bottoms. Until such time as the legal basis for Surface water adoption bodies is established interim arrangements for maintenance of SuDS will be agreed at the planning application stage

- q) Para 4.52, Page 73 – In response to comments raised on drainage and in consultation with IBC Drainage Engineer, the following has been inserted at the end of this paragraph **“In particular it should be noted that detailed SuDS design may result in encroachment into areas identified for development on the Development Framework Plan, as shown in the IBC SuDS strategy.”** So that the revised paragraph 4.52 reads as follows:-

Revised paragraph 4.52

The preliminary strategic areas for SuDS shown on Figure 12 are overlaid on the Development Framework Plan (Figure 5) in order to highlight areas where an ongoing and iterative process of masterplanning and SuDS is likely to be required to adhere to the principles of the SuDS Strategy. It should be emphasised that the design of a viable development which incorporates an

adoptable SuDS network for the site may generate revisions and refinements to the land use allocations and other drawn guidance as set out in this document. In particular it should be noted that detailed SuDS design may result in encroachment into areas identified for development on the Development Framework Plan, as shown in the IBC SuDS strategy.

- r) Figure 12, Page 77 – In response to comments raised on drainage and in consultation with IBC Drainage Engineer, title amended to figure 12 to read **“Indicative Preliminary Strategic SuDS requirement”**

- s) Figure 13, Page 79 – Cricket pitch reference removed from illustrative masterplan.

- t) Page 95 – In consultation with IBC Drainage Engineer, additional street cross section added to show typical residential street cross section which includes key design principles together with SuDS zone.

- u) Para 5.45, Page 106 – In response to comments made, amendment is included to clarify that any rear parking spaces are not to be included as part of garden dimensions for purposes of assessing against minimum standard sizes for gardens.

Draft of paragraph of 5.45

Dimensions for gardens do not include any rear garden spaces.

Revised paragraph 5.45

For the purposes of considering proposed garden sizes against minimum policy requirements for rear garden sizes, any rear parking spaces should not be included as part of the rear garden dimensions.

- v) Para 6.36, Page 130 – Clarity added to this paragraph, that managed access to the railway bridge will be subject to consideration of the detailed transport assessments to be submitted. The original draft and revised paragraphs are shown below:-

Draft of paragraph of 6.36

Primary vehicular access points will be provided at Westerfield Road and Henley Road. Primary access points should be connected by the internal Primary Streets and the proposed new railway bridge in order to enhance the strategic road network within north Ipswich. The new railway bridge will be designed with a facility to prevent access by private cars at certain times should the need arise in the interests of good traffic management.

Revised paragraph 6.36

Primary vehicular access points will be provided at Westerfield Road and Henley Road. Primary access points should be connected by the internal Primary Streets and the proposed new railway bridge in order to enhance the strategic road network within north Ipswich. The new railway bridge could be designed with a facility to prevent access by private cars at certain times should the need arise in the interests of good traffic management, this will be further investigated through future transport assessments and secured where appropriate.

- w) Para 7.4, Page 134 – At present this paragraph rules out the application of a Community Infrastructure Levy (CIL) or similar to fund infrastructure in the area. Work on infrastructure provision and the method by which funding responsibility is distributed between landowners is ongoing and would form part of the site-wide Infrastructure Delivery Plan to be submitted with the planning applications. It maybe that a CIL rate or similar is determined more appropriate than securing individual contributions through S106 in the event that satisfactory agreement cannot be reached between landowners. On that basis para 7.4 has been amended to allow for this option in the future. The original draft and revised paragraphs are shown below:-

Draft of paragraph 7.4

The Council has commenced work on Community Infrastructure Levy (CIL) rates, which will introduce charges on new developments to fund infrastructure projects across the Borough. However, it is considered that the best option for securing infrastructure for the Garden Suburb site would be through planning conditions and a site-specific Section 106 Agreement with the landowners to ensure that their commitment of either direct delivery of or financial sums towards infrastructure that relates directly to the development site. On strategic sites such as the Ipswich Garden Suburb, an exemption from CIL rates will likely be included within the Council's Charging Schedule.

Revised paragraph 7.4

The Council has commenced work on setting its Community Infrastructure Levy (CIL) rates, which will introduce charges on new developments to fund infrastructure projects across the Borough. However, at this stage it is considered that the best option for securing infrastructure for the Garden Suburb site would be through planning conditions and a site-specific Section 106 Agreement with the landowners to ensure that their commitment of either direct delivery of or financial sums towards infrastructure relates directly to the development site. On strategic sites such as the Ipswich Garden Suburb, an exemption from CIL rates can be included within the Council's Charging Schedule. Notwithstanding the above, the Council will continually review whether CIL should be levied on part of or the entire site where it feels that the forthcoming changes to the pooling of Section 106 contributions may adversely impact upon infrastructure delivery, which could arise where multiple full/outline applications are submitted.

- x) Para 7.21, Page 138 - Additional wording added to clarify purpose of table 1. Additional wording added at end of Strategic Infrastructure paragraph to read “...**alongside contributions towards off-site infrastructure improvements**”

that are considered strategic in nature.” The original draft and revised paragraphs are shown below:-

Draft of paragraph 7.21

For this reason, the infrastructure required for the garden suburb development and set out below has been divided into two categories:

- ***Strategic infrastructure*** that may be located in a single neighbourhood but is required to mitigate the cumulative impact of and serve the whole of the Garden Suburb development (and in some cases the wider community), and therefore is likely to require a comprehensive approach from all landowners to secure its delivery. These are listed in Table 1 below.

Revised paragraph 7.21

For this reason, the infrastructure required for the garden suburb development and set out below has been divided into two categories:

- ***Strategic infrastructure*** that may be located in a single neighbourhood but is required to mitigate the cumulative impact of and serve the whole of the Garden Suburb development (and in some cases the wider community), and therefore is likely to require a comprehensive approach from all landowners to secure its delivery. These are listed in Table 1 below alongside contributions towards off-site infrastructure improvements that are considered strategic in nature.

- y) Para 7.22, Page 138- additional wording added to reference the need for superfast broadband being delivered. The original draft and revised paragraphs are shown below:-

Draft of 7.22

The lists do not include localised physical infrastructure such as secondary and tertiary streets and footpaths, bus stops and shelters, local SuDS networks, acoustic fencing, local habitat mitigation measures or section 106 and air quality monitoring which will be delivered by individual developers in accordance with a detailed planning permission for the phase to which they related

Revised paragraph 7.22

*The lists do not include localised physical infrastructure such as secondary and tertiary streets and footpaths, bus stops and shelters, local SuDS networks, **superfast broadband**, acoustic fencing, local habitat mitigation measures or section 106 and air quality monitoring which will be delivered by individual developers in accordance with a detailed planning permission for the phase to which they related*

- z) Para 7.25, Page 139 – Amended wording to third bullet point of paragraph 7.25 to replace ...”**in the interest of securing a sustainable development pattern**” with “**and consideration of what is necessary at various stages of the development in order to deliver a sustainable form of development**” in order to clarify that triggers have been considered in light of what infrastructure is

needed at different stages of development. The original draft and revised paragraphs are shown below:-

Draft of paragraph 7.25, third bullet point

- *the desire to create cohesive neighbourhoods in the interest of securing a sustainable development pattern;*

Revised paragraph 7.25, third bullet point

- *the desire to create cohesive neighbourhoods in the interest of securing a sustainable development pattern and consideration of what is necessary at various stages of the development in order to deliver a sustainable form of development;*

aa) Infrastructure tables, chapter 7, Pages 140-146 – Amendments are incorporated to both the strategic and neighbourhood infrastructure tables contained in chapter 7 of the SPD. There are three main changes to the infrastructure list and trigger points contained in Table 1:

(i) The trigger point for the completion and land transfer of initial ancillary works to include the visitor facility / community centre at the Country Park has been amended to 500 rather than 300 dwellings, which would allow for the further expansion of the neighbourhood to enable utilities and road infrastructure to connect this part of the site.

(ii) The provision of a serviced health centre site rather than securing a reserved site for this use is now required within the District Centre. This follows the consultation response from the local agents of the NHS when read alongside government guidance contained within the NPPG, which clearly establishes the link between the provision of new health infrastructure and development. It is intended that a site of approximately 0.2ha is required with phased contributions to fund delivery.

(iii) The trigger point for the transfer of a serviced site for the secondary school is removed and replaced with a requirement for arrangements to secure construction of a secondary school being in place prior to development commencing in order to meet an agreed timetable of delivery.

The other changes to the tables are considered necessary to add clarity to what would be required, with some items now merged where appropriate, and there is an additional reference to the provision of on-site signage (monoliths) which was not included previously but has been indicated as required to the prospective developers in previous discussions.

Full tracked version of the tables is contained in Appendix 14 of the Council report.

bb) Page 150 – Additional paragraph added to state that as part of the community development strategy work the Council will seek to secure the inclusion of strategies to provide training, employment and business opportunities for local people and businesses.

New paragraph 8.4

As part of the Community Development Strategy, the Council will encourage the inclusion of strategies to provide training, employment and business opportunities for local people and businesses.

cc) Para 9.5, Page 152 – In response to comments from Councillor Jones, an additional sentence has been added to the end of paragraph 9.5 to clarify that: **“Notwithstanding this, the adoption and management of the open spaces by Ipswich Borough Council has not been precluded as an option for ensuring the appropriate future management and maintenance of the public open spaces within the Ipswich Garden Suburb”.**

dd) The following minor errors, spelling and corrections are addressed:-

- Contents, page 7 - amended page reference for **“Infrastructure to Support the Growth of a Community”** to page 134.
- Page 33 – Added title to plan **“Figure 4 – Environment Site Features Plan”**
- Para 5.3, page 78 - amended references to **“Appendix B”** to **“Appendix 2”**.
- Title, page 152 - corrected spelling in title.
- Para 10.4, page 154 – deleted **“detailed”** from 5th line **“...be submitted as part of a detailed outline planning application...”**.
- Figure 49, page 155 – Amended Phase 1 to refer to **“Fonnereau”** and Phase 2 to **“Henley Gate”**.
- Para 7.7, line 2 – replaced **“n”** with **“in”**
- Para 7.15, line 1 – replaced **“.in”** with **“in”**
- Para 7.16, bullet 2, 2nd line – changed **“Village”** with **“Gate”**
- Para 7.16, bullet 3, 2nd line – changed **“Village”** with **“neighbourhood”**
- Para 7.19, last line – changed reference to **“SCC 2014”** as this has been updated.
- Para 7.21, bullet 2, 3rd line – deleted **“village or”**
- Para 7.28, 2nd line – changed **“in in”** to **“in the”**
- Para 7.32 – 2nd bullet, 1st line – added **“form”** into **“...”high quality [form] of development”**...

APPENDIX 3 - RESIDENTS SUMMARY OF COMMENTS

Source	Comment	IBC Response	Action Required
			(BLANK BOXES MEANS NO ACTION REQUIRED)
Principle			
Residents	Principle concerns relating to	This is an issue which is relevant to strategic	

	using brownfield site / bringing back existing redundant stock in town before developing IGS.	planning policy and would be considered as part of the Core Strategy and where relevant in the Focused Review.	
Residents	Question the need for housing and if needed it needs to be in parallel with jobs growth.	This is an issue which is relevant to strategic planning policy and would be considered as part of the Core Strategy and where relevant in the Focused Review.	
Residents	Loss of agricultural land and implications for food production.	This is an issue which is relevant to strategic planning policy and would be considered as part of the Core Strategy and where relevant in the Focused Review.	
Residents	Question role of IBC to promote development schemes of this type. Large scale, strategic projects are better left to County Council and National Government. IBC should concentrate on essential functions such as cleaning and repairs to existing infrastructure (street gutters, lighting).	Ipswich Borough Council is the Local Planning Authority and as such has a statutory duty to develop planning policy in order to allocate land for housing for the borough.	
Vision and Objectives (Chapter 2)			
Residents	Energy efficient and sustainable housing should be of primary importance. Should be a minimum % of houses which are of passivhaus design.	A Sustainability and Energy Assessment will need to be submitted with planning applications to demonstrate how all housing meets sustainability and energy efficiency requirements as required by Core and Development Management policies. The levels of the code for sustainable homes required include many of the same principles as passivhaus in addition to other requirements.	
Residents	Well thought out but concerns that 'sense of place' and identity will not be delivered.	SPD is quite clear in Vision and Objectives section that character is key principle of IGS and should have a distinct sense of place derived from existing natural and historic features as well as high quality urban design and architecture (para 2.16). This idea is continued through the whole document by addressing design concepts at every scale, how development should address Red House Farm and existing trees and hedgerows, as well as identifying at the outset that the Borough Council requires the IGS to be an exemplar sustainable urban extension (para 2.3).	
Residents	Solar panels should be prohibited, as in long term they will fall into disrepair and throughout their use they will focus light into existing properties.	The specific sustainability measures to be used will be set out in the application details. Solar panels are not to be ruled out in the SPD as there could be ways of providing/securing solar panels without the negative effects mentioned.	
Planning Framework (Chapter 3)			
Residents	The Henley Gate centre should be moved to adjacent to Henley Road so it can serve existing residents to west of Henley Road which have a severe lack of	Location of local centre considered appropriate to ensure within suitable walking distance of future residential areas as well as for residents on Henley Road. This is demonstrated in figure 7 on page 51 which demonstrates the extent of future and existing housing which would be	

	community open space / facilities.	within 5 minute / 400 metre walking distance of the proposed local centre.	
Residents	Not much local employment sources shown and doubt town centre can support (employment wise) numbers proposed.	The majority of Ipswich is within four miles of IGS. Ipswich town centre is a significant area of employment and is approx. 1 mile from IGS. NPPF requires provision of assessed housing need without reference to employment projections. Site Allocations and Proposals DPD identifies and allocates suitable land for employment over the plan period.	
Transport Strategy (Chapter 6)			
Residents	Connections with existing cycle routes are not shown. Cycle and pedestrian routes from SPD site to town centre need thought - currently problems with cycle speeds and conflicts with pedestrians	The Transport Strategy contained in the SPD contains a plan of existing cycle and pedestrian routes (figure 46 on page 124) and para 6.10 identifies that a comprehensive cycle and pedestrian network within the IGS will be provided and this should ensure direct connections to existing cycle routes. Further detailed work will be required on design and layout to establish the connections and ensure that routes are suitable for cycle and pedestrians.	
Residents	Bus routes in to town not appropriate to take buses.	The conclusions of the transport assessment should identify the mitigation necessary, which include improvements to bus services. The capacity of the existing road network to accommodate this will need to be assessed by SCC as part of this work.	
Residents	People do not work in locations accessible by public transport / car will be required for commuting. Transport Strategy does not take account of where people likely to work.	This point is recognised in Para 6.17 (page 126) and highlights the need for further investigation on the matter through the detailed Transport Assessments to be submitted with planning applications.	
Residents	Why are there no access roads in Westerfield / why are there limited access roads.	The access points identified were considered most appropriate to serve the needs of development proposed and its location, as well as enabling the potential control of the flow of traffic onto the wider road network.	
Residents	There have not been plans developed as to how the extra traffic can be managed on the roads into town inside the Valley Road, particularly Westerfield Road and Bolton Lane.	More detailed Transport Assessments are required to be submitted as part of the detailed planning application submissions, which should cover in more detail the impacts on roads nearby and mitigation required.	
Residents	Improvements to existing road network need to be considered / northern bypass is required. Existing road network cannot cope especially when issues with Orwell Bridge/A14. Has knock on effects for air quality, health, commercial attractiveness of town for business.	In giving consideration to the proposed allocation of land at the Northern Fringe for new housing in the Ipswich Borough Council Core Strategy and Policies DPD, the highway authority (Suffolk County Council) took the view, based on modelling work at the time, that a phased development of up to 5000 dwellings at the Northern Fringe could be accommodated on the existing highway network without the need for new road building subject to a range of demand management and traffic management measures being introduced. More detailed Transport Assessments are required to be	

		submitted as part of the detailed planning application submissions, which should cover in more detail the impacts on roads nearby and mitigation required.	
Residents	Replacement of roundabouts with traffic lights. Civic Drive cited as example of where this has not worked.	Detailed Transport Assessments are required to be submitted with planning applications. These will give more detailed results on traffic impacts and mitigation required. The Urban Traffic Management Control (UTMC) system has been identified as part of the anticipated mitigation required for the reasons set out in para 6.3 (page 122) of the SPD. Suffolk County Council are the Highway Authority, and the Transport Strategy included in the SPD is produced in consultation with them. SCC will also provide leading advice on the Transport Assessments submitted with the planning applications and the appropriateness of the mitigation proposed and how it integrates with the wider traffic systems in Ipswich.	
Residents	More parking needed / larger parking standards need to be incorporated.	No parking figures are given. Para 5.47-5.49 advises that the Council will require a strategy which embodies best practice and is developed through future design work. All parking would be considered against latest SCC parking standards at time planning application made.	
Residents	How will Fonnereau Way be designed so that it maintains character and accommodates cycling and walking without conflict. It is noted as being an important part of the East Suffolk Line Walk.	The appearance of Fonnereau Way is important as is the way in which it is laid in order to enable most effective use. These details will be worked through in more detail during the planning application stages.	
Residents	No reassurance as to what constitutes 'generous space' either side of Fonnereau Way. Figure 3 misrepresents the northern section of Fonnereau Way and Figures 7 and 11 do not show current course of public footpath correctly and no proposal in text that path is being re-routed.	Section G (page 95) illustrates the 'generous space' expected either side of Fonnereau Way. Exact details determined at planning application stage and subject to more detailed assessment. Figure 3 does not identify Fonnereau Way as set out in definitive footpath plans. Figure 7 and 11 do show Fonnereau Way in accordance with definitive footpath maps (solid line) as well as additional proposed footpath routes (shown as dashed lines).	
Residents	Protection of front gardens from parking cars is need.	Measures for securing front gardens from used for car parking will be subject to consideration at planning application stage. The SPD sets out appropriate ways to design car parking into the developments.	
Residents	Would like an explanation of why access to the new railway bridge would be restricted at certain times - what is the impact on traffic flows?	It is suggested at para 6.36 that the proposed railway bridge within the site, could be equipped to prevent access by private cars at certain times in order to manage traffic flows where necessary. The details of this and whether it was a suitable strategy would need to be considered in the context of the transport assessment data and results. Clarity on this could be added to SPD.	Para 6.36, Page 130 – Clarity to be added to this paragraph that managed access to the railway bridge will be subject to consideration of the detailed transport assessments to be submitted.
Residents	Investment in rail facilities should be proportionate to a realistic assessment of the	The detailed Transport Assessment to be submitted with future planning applications will provide basis for which the future capacity	

	amount of use likely to be generated on rail, given the frequency / convenience of services.	improvements required can be ascertained and necessary funding concluded.	
Residents	Not enough information contained in SPD of traffic modelling and assessment undertaken to date.	SCC have been involved with producing the SPD and have advised from an informed position based on previous modelling work. This work was used in identifying the site as suitable for future housing from a strategic view. More detailed modelling work is required to be undertaken and submitted with future planning applications.	
Residents	Improvements to rail facilities including another station at Henley Road, more frequent trains, more light weight people-carrier type trains.	Transport Strategy is focused on improving the existing station at Westerfield and is considered most suitable option as opposed to a new train station. The way in which capacity at the station will be increased will be subject to further discussion as proposals in the area develop.	
Drainage / Flooding / SuDS			
Residents	Do they take account of extreme weather situations	Pages 73-74 set out more on SuDS strategy. Preliminary work undertaken concludes strategy can be implemented which is effective. The preliminary SuDS strategy takes account of increases in expected peak rainfall intensity in accordance with national guidance.	
Residents	Guarantees for existing housing, ongoing maintenance and Health and safety concerns	There is no formal provision for financial guarantees. This is normal practice. Details of the SuDS scheme for Phase 1, including adoption and supervision, will need to be submitted and approved as part of the planning application before construction can commence. SUDs submissions will need to include details of how SUDS installation will be phased to avoid any worsening of downstream flooding at all stages of development. If flooding resulted from some action of the developer (upstream land owner) during the course of construction, then enforcement action might be taken by the planning authority or SCC. The council might become involved in such issues if a "statutory nuisance" was caused.	
Residents	Understand there has not been a hydrology report, therefore no ideas of the water table in the area, which means it would not be possible to plan a reliable solution to the surface water disposal.	A Flood Risk Assessment (FRA) would be required to be submitted with a planning application and this will cover relevant hydrological issues. Requirements for FRA's are set out in https://www.gov.uk/planning-applications-assessing-flood-risk . The developer will need to undertake geotechnical investigations for foundation and road design as well as drainage and these are likely to determine ground water levels. The SUDS scheme being planned does not rely on soakage into the ground.	
Infrastructure (Chapter 7)			
Residents	Sewage infrastructure	How and what is required in terms of sewage infrastructure is not yet determined. Chapter 7 identifies strategic improvements to the sewerage system and water supply as being some of the infrastructure requirements	

		identified and developers will need to do further investigation in that respect in order to determine what improvements / extra provision is required.	
Residents	Ensuring Delivery of infrastructure	The SPD is the first step in identifying the infrastructure which is needed to support the development of IGS. These are given in chapter 7 of the SPD alongside an indication of what point in the development they would be needed and could be viable to fund by the developers. These will form the basis of the Infrastructure Delivery Plan which is required to be submitted as part of the planning applications and can later form the basis for securing infrastructure items through planning conditions or legal agreements.	
Residents	Schools – pressure on existing schools will result. Has this been factored into existing schools expansion programmes.	Suffolk County Council as Education Authority have been consulted on the SPD and education provision. They will continue to be consulted on future planning applications, so that they can factor into their future school programmes.	
Residents	Should ensure Country Park, wildlife habitats and other green spaces are provided before housing development starts.	The country park is associated with the Henley Gate neighbourhood and its provision will need to be related to commencement of development on this site. The triggers have been set at the earliest point considered viable for the development to provide. An earlier point for tree planting and landscaping could be included so that it has greater time to establish before park opens.	Additional provision included in the Country Park item in the infrastructure tables to include Tree planting and landscaping phasing to be agreed and commenced at early point in development of Henley Gate.
Residents	Location in a low rainfall area, concern about impact on water supply.	Is included as part of strategic infrastructure items to be provided in chapter 7.	
Residents	Affordable homes should be added as a key item of infrastructure to ensure tenure mix and 35% policy objective should be reiterated.	Local Plan policy requires that new developments provide 35% affordable housing, subject to viability.	
Residents	Infrastructure must be in place early or people will have chosen other alternatives. Need to address early improvements to: Westerfield Rail Station; bus services, narrowness of Westerfield Road.	This point is recognised in the transport strategy, particularly with regards to bus services (para 6.20). Exact phasing will need to be agreed and informed by transport assessments.	
Residents	There needs to be scope for churches to be built. A multi-use community centre does not meet this need because of limits on times, different requirements etc. Also general comment in 'other matters'.	Community Development Strategy will need to be submitted with planning application to identify how different community needs will be met. A multi-use community use space is considered possible to function as a church as well as other community uses.	
Residents	Whilst overall an excellent plan for the area the draft plans increase the difficulty of replacing Westerfield Level Crossing with a bridge or underpass. The future	Network Rail have been consulted on the proposals and it has been concluded at this stage that there is not a need for a vehicle bridge or underpass but potentially an improved level crossing. A new pedestrian bridge is identified in the infrastructure table which is	

	increase of both rail & road traffic will make this necessary so why not plan for it now?	being planned for. Network Rail will be consulted on the more detailed Transport Assessments when they are submitted.	
Residents	Westerfield station needs improving but also the track needs upgrading so it can take more trains. There needs to be double line in order to ensure that the line can cope with the increasing train use that may occur and based on the increase in train use generally most likely will occur here too.	More detailed Transport Assessments are required to be submitted as part of the detailed planning application submissions, which should cover in more detail the impacts on different transport modes and will give indication of increased capacity required.	
Residents	Will there be a hospital? The existing hospital cannot cope with extra population.	The infrastructure required to support the development has been identified in the SPD. This does not include a hospital, but does include a health centre.	
Design and Scale			
Residents	Specific areas of SPD which adjoins existing residential areas and ensuring certain response in terms of building heights, access roads, garden areas, distances.	Figure 6 on page 49 recognises that in most places where existing housing adjoins proposed residential areas, a soft landscaped area is required to address this particular edge. The precise detail of this landscaping and relationship of development scale to existing properties is not covered in the SPD as it will be considered in more detail at planning application stage. The application proposals will be assessed on acceptability in terms of creating an appropriate edge to existing houses as well as achieving a density of housing which makes the most efficient use of this greenfield site.	
Residents	Design not high quality / mediocre	The role of the SPD is to give guidance and framework on how the development should be designed and principles which should be incorporated such as minimum garden sizes, car parking standards, the layout of various key uses (shops, schools, main roads). It will be role of future developers to take this and work up designs to be considered at the planning application stage. The SPD sets out as part of the vision and objectives of the area a theme of 'Character' which identifies the importance of creating a garden suburb with a distinct sense of place with high quality urban design and architecture. It also states that the character of the garden suburb will be landscape dominated and part of the spatial strategy which informs the masterplan is the retention of existing hedgerows and trees.	
Residents	Adequate consideration of wheelie bins? Road width large enough for bin collections, van parking, deliveries etc?	Suitable design solutions, access and space will be a detailed consideration to be assessed at the planning application stage with relevant council departments.	
Residents	Proposed garden size is sub-optimal and appears designed to squeeze more units into the space rather than to develop high quality/high value	The minimum garden sizes set out in para 5.44 are based on core strategy policy DM3. These together with the identified density range of 30-35 dwellings per hectare is considered to make most efficient use of the greenfield site whilst still	

	residential areas.	enabling a character of development which is consistent with garden city principles.	
Residents	Figure 5 (p37) the provision of additional informal open space on the southern and south western boundaries would add useful green space between existing and proposed residential development.	A soft landscaped edge along this boundary is identified in figure 6. Open space which is accessible that is located along backs of gardens is not considered good practice in urban design terms.	
Residents	Comment/request in relation to Red House neighbourhood - Meadow behind number 2-14 Bromeswell Road is an area of natural beauty. Request that a stretch of green space with shrubs and trees be created behind these houses to a be a width of a least 25 metres to preserve quality of the environment currently enjoyed by residents who have lived here many years contributing to Ipswich's economy. This will also help properties from being de-valued. In this relatively small area would ask that the number of domestic dwellings is kept to a minimum and should be bungalows as all the residences in Bromeswell Road are bungalows. Gardens in this area should be larger than currently specified to enhance this small scale development.	Figure 6 on page 49 recognises that a soft landscaped area is required to address this particular edge. The precise detail of this landscaping and relationship of development scale to existing properties is not covered in the SPD as it will be considered in more detail at planning application stage. The application proposals will be assessed on acceptability in terms of creating an appropriate edge to existing houses as well as achieving a density of housing which makes the most efficient use of this greenfield site.	
Residents	The design fails to make best use of the topography of the site, giving an unnatural feel to the landscaping and making it more likely that flood alleviation will be intrusive and ineffective	Topography has been considered in the spatial layout of the masterplan and has enabled the identification of the broad location of the strategic SuDS, areas to remain undeveloped which are most prone to surface water flooding due to levels and location of country park on land which slopes away from development.	
Residents	Concerns with artificial light and light pollution.	This is recognised as a potential amenity concern and is stated in para 2.25 – “Light pollution from artificial light should be limited through detailed design for the amenity of local residents, the landscape and nature conservation”.	
Residents	Fonnereau Way is 8m from kitchen and proposals will dramatically change its usage which is of great concern. Fig 19, page 89 needs to be widened to at least 10m for wheelchair clearance /safety. Boundary treatment (thick hedge/metal fence) is needed to protect privacy and attenuate noise between path	The intensity of use of Fonnereau Way is likely to change. The full impact of this will be explored in more detail at the planning application stage when more detailed assessments and design is available. This will also include more detail on the improvements/amendments needed to Fonnereau Way including boundary treatments in order to accommodate the change in use and enable inclusive access. Figure 19 in the SPD is an indicative section and is expected to be developed in detail as part of the planning	

	and adjacent existing properties as path will be used more heavily.	application proposals.	
Residents	A higher density should be considered to make best use of land and ensure equitable mix of tenures and sizes of homes.	The density proposed is considered an appropriate balance between making most efficient use of the land for housing, whilst taking account of the densities of housing which presently exist adjacent to the site, along with its rural edge and achieving a 'garden suburb' character. Page 40 of the SPD covers house size and mix which should be policy compliant and reflect the housing need of the borough.	
Residents	No mention made of single storey dwellings, which could free up other family housing in Ipswich. The local residents, which are comprised largely of an ageing population would welcome the provision of bungalows.	Bungalows are not mentioned specifically but the document sets out the need for developments coming forward to accommodate a range of house types and precise details of mix will be negotiated on phase by phase basis having regard to latest evidence available on need. Para 3.22 also specifically notes providing suitable accommodation for the elderly wishing to downsize.	
Residents	What will stop developers using their standard 'off the peg' designs to reduce cost.	SPD is quite clear on quality design and this will be assessed at planning application stage.	
Residents	Figures 43-45 do not give realistic impression of developments – trees are in full bloom, few cars and people visible. Also no reference points in order to orientate images.	The figures are intended to just be a visual illustration of how the design principles in the preceding chapter could appear. The precise detail of the developments will be determined through the planning application stages and will be available for public inspection.	
Biodiversity			
Residents	Loss of wildlife habitat	The preparation of the SPD has been informed by a comprehensive habitat survey of the area carried out for the Council by the Suffolk Wildlife Trust. This survey identifies the main habitats of value as being the existing hedgerows, pockets of woodland, and mature trees on the site. Biodiversity and Ecological Reports are to be submitted as part of the detailed Environmental Impact Assessments with each planning application. These we will identify any impacts and necessary mitigation required. (page 157).	
Air Quality			
Residents	The EU is currently planning to take UK to court for failing to comply with air quality standards. St Margarets Church already suffers from air quality problem. Extra traffic would make it much worse. No plans as to how this will be avoided.	Air quality assessments would need to be submitted as part of the Environmental Impact Assessments for the proposed developments. This will ascertain any air quality issues and mitigation recommended. These will be considered by the Environmental Health dept within the Council and assessed against the relevant planning policies.	
Community Development (Chapter 8)			
Residents	The new development will not be integrated with the town /	The SPD identifies ways in which development can integrate with town through transport	

	what improvements to quality of life for existing residents will there be? fail to address the development's place and role within the greater Ipswich and Suffolk regions. To focus on the development in isolation mean that opportunities and risks will be overlooked, and strategies to mitigate or deliver to greater society will not be recognised or deployed.	connections (eg. paras 6.10 and 6.25). SPD takes account of wider needs of Ipswich through provision of Country Park and Visitor Centre as well as fulfilling housing need for the town. Community Development Strategy will also need to be submitted and agreed and this sets out how the new community will be established and develop links with surrounding neighbourhoods (para 8.1).	
Residents	Mix of races and religions not reflected in images in document.	The images in the SPD have been chosen because they provide pictorial illustration of the points being made in the text - good design, range of community activities and people's interaction with the design of space. Images are not intended to represent the mix of people who live in Ipswich or will occupy the development in the future.	
Residents	Needs of ethnic minorities not addressed in proposed provision.	The SPD does not make reference to provision for certain community / ethnic / religious groups. It does however propose a mix of housing and community facilities which are available to all groups. Chapter 8 of the SPD sets out how community development will be established in the development and this will be the process by which future community needs are identified and accommodated.	
Residents	Request that development includes affordable / council rented / housing association houses amongst the privately owned houses.	SPD requires a mix of housing including affordable housing to be included in the planning proposals. The level of affordable housing would be subject to viability testing. The details of the exact mix and location would be determined at the detailed stage of the planning application.	
Residents	Good community is necessary to prevent problems of antisocial behaviour / crime. Community facilities for children, young people (youth clubs), sports, community facilities, adult education services at the school are essential. A site for a church and church hall should be included.	The importance of this issue is recognised in the vision and objectives chapter 3 and chapter 8 (Community Development). A community development strategy is required to be submitted which sets out how the proposed development would establish community and links with existing communities. This is expected to be included in the facilities and provisions necessary to support this. Space is included in the infrastructure requirements for community use. The exact nature of this in terms of whether it is for church uses will be determined at a more detailed stage in the planning process.	
Long Term Management & Maintenance (Chapter 9)			
Residents	The garden suburb includes green open space who will be responsible for maintaining it? If Council adopts where is funding going to come from and will it affect existing housing if funding is directed to the garden suburb?	Chapter 9 allows for different management models to taken forward subject to feasibility work. This work would also include possible funding sources and ensuring that if Council adopts that sufficient funding is secured.	
Residents	The management trust or other such vehicle for	It is agreed that direction of management model to be utilised should be discussed in more detail	

	managing open space must be agreed with the developers in advance to construction and confirmed in the S106 agreements.	and agreed before development commences.	
Residents	Handing over communal land to a management trust may not prove cost effective and retaining this within the IBC portfolio will ensure continuity of maintenance, paid for by the increase in community charge and business rates from the scheme.	Such queries need to be explored further as to how different management models could operate and be funded. The SPD identifies this in chapter 9 and sets the scene for further investigation work to be undertaken.	
Residents	Given the high density of 'affordable housing' I would consider the future maintenance costs being met by normal rate charges for the area be over optimistic.	The point is noted and would form part of further work to ascertain how management would operate and funded – as identified in chapter 9.	
Future Planning Applications (Chapter 10)			
Residents	Propose number of pre-requisites which relate to construction traffic routing; detailed plans for public transport proposals; and early provision of schools and shops etc.	The application documents required in chapter 10 will provide a certain level of information on these issues, and will form the basis for further discussion and detail to be secured on these items through conditions and s106 legal agreements.	
Other			
Residents	Assumed noise mitigation will be included in the development due to close proximity of railway line.	Planning application requirements in chapter 10 of the SPD includes noise assessments to identify necessary mitigation.	
Residents	Not all TPO trees shown and areas of existing woodland should be shown as being retained.	Figure 5 of page 33 of the SPD includes the TPO trees the council has records for. Further arboricultural survey work is to be undertaken to ascertain the quality and health of all trees and hedgerows within the site and from this it will be concluded which shall be retained and protected.	
Residents	Appropriately sized supermarket which is provided by a popular leading supermarket group chosen by local residents is critical to the sustainability of the development.	Agreed that size appropriate to cater for demand without being too large is recognised. The size of appropriate store is specified in the SPD and is underpinned by a retail impact assessment. The planning system cannot specify the particular company or type of company to operate the store however.	
Residents	The school, which will service the rest of north Ipswich as well as the new development, is put on the furthest part of the site, making it less accessible to current residents than if placed further south.	The location of the secondary school was considered appropriate as it would enable a buffer to be created between the proposed built development and existing Westerfield village through the siting of school playing fields. The school playing fields could also assist with drainage strategy as they would be situated in location which is at risk of surface water flooding and would also provide a buffer to railway line. The fact it is further from Ipswich is balanced with the other advantages to its location.	
Residents	Would be better to have housing designed more on	There is a need for housing and associated infrastructure. A water / leisure park is not	

	right side than left, with water / leisure park on the left to allow distribution of residents to access Westerfield train station and using Westerfield Road rather than Henley Road, which already serves greater existing population.	identified as being necessary to provide. The point about where traffic should be directed to, could be looked at as an outcome of the detailed Transport Assessments to be submitted.	
Residents	There may be merit in the odd 3 storey building near the local centres, but in general there should be firm limits - usually 2-storey. Builders should not be allowed to go higher just to maximise profit. To ensure variety some small lots should be allocated to local builders not large national chains.	The SPD identifies that the general scale of housing will be two storey (para 3.25) although some higher or lower may be appropriate in some areas, but this will depend on the appearance and impacts on surrounding amenity. The SPD cannot specify that lots are given to local builders but variety of architecture is identified in the vision and core objectives and self-build is also encouraged within the SPD.	
Residents	We would like to see the proposed district centre put more equal distance between town and village. It seems rather close to existing residents in Westerfield Road which may cause problems with traffic and congestion as well as being overlooked with taller buildings.	There is an area of residential proposed within the masterplan so that the district centre is not immediately adjacent to existing residents in Westerfield Road. The location of the District Centre is considered appropriate closer to the town given its urban character and enables more of the rural character of Westerfield Road to be retained as the road goes northwards.	
Residents	No one knows how needs will change in 5, 10, 15 years. Therefore suggested small pockets to be reserved - 3% for 6 years and 3% for 12 years, in order to allow for dynamic response to future needs.	The SPD seeks to be flexible on some details to allow for future changes/ needs as communities develop. This still requires an overarching masterplan providing a spatial basis for strategic land uses and avoid piecemeal development.	

APPENDIX 4 – NFPG CONSULTATION PRO FORMA SUMMARY

Source	NFPG Pro-forma statements	IBC Response	Action Required (BLANK BOXES MEANS NO ACTION REQUIRED)
NFPG pro forma	Job growth sites are not within easy reach by public transport or sustainable means and this will result in increased car usage.	The majority of Ipswich is within four miles of IGS. Ipswich town centre is a significant area of employment and is approx. 1 mile from IGS. NPPF requires provision of assessed housing need without reference to employment projections. Site Allocations and Proposals DPD identifies and allocates suitable land for employment over the plan period. Detailed Transport Assessments required to be submitted with each planning application will look at transport impacts and include travel plans to encourage sustainable travel modes.	
NFPG pro forma	Commuting by car will make traffic congestion, rat –runs and air quality much worse.	Detailed Transport Assessment and Air Quality assessments are required to be submitted with planning applications. This will identify such traffic	

		impacts and appropriate mitigation. The potential impacts and issues are outlined in chapter 6 (Transport Strategy) along with suggestions for mitigation. This has been produced in consultation with Suffolk County Council (Highway Authority) who do not object to IGS allocation for housing.	
NFPG pro forma	I have major concerns over the proposed traffic scheme including replacing Valley Road roundabouts with traffic lights.	Detailed Transport Assessments are required to be submitted with planning applications. These will give more detailed results on traffic impacts and mitigation required. The Urban Traffic Management Control (UTMC) system has been identified as part of the anticipated mitigation required for the reasons set out in para 6.3 (page 122) of the SPD.	
NFPG pro forma	A full traffic impact assessment needs to be made of the Travel Ipswich Traffic Light system before including it in the Ipswich Northern Fringe proposals.	Suffolk County Council are the Highway Authority, and the Transport Strategy included in the SPD is produced in consultation with them. SCC will also provide leading advice on the Transport Assessments submitted with the planning applications and the appropriateness of the mitigation proposed and how it integrates with the wider traffic systems in Ipswich.	
NFPG pro forma	Developments need to be made more resilient to flooding. The Sustainable Urban Drainage scheme needs careful planning, assessment and sensitivity analysis taking into account more extreme weather patterns.	The SuDS scheme set out in the SPD is to be designed to a higher standard than older traditional drainage systems and will include an allowance for climate change. The system would be designed to store runoff and release it at no more than the natural rate into the watercourse – the ground conditions are recognised as being unsuitable for soakage into the ground.	
NFPG pro forma	Residents deserve to know the proposals for the new sewage infrastructure and these should be included in the infrastructure information.	Anglian Water are in discussions with developers on how this will develop. Details of such infrastructure improvements are required through the Infrastructure Delivery Plan to be submitted with a planning application.	
NFPG pro forma	I would like to see larger rear gardens than currently specified to enhance the development.	Rear garden sizes specified in SPD comply with adopted policy DM3.	

APPENDIX 5 – CONSULTEES SUMMARY OF COMMENTS

Source	Comment	IBC Response	Action Required (BLANK BOXES MEANS NO ACTION REQUIRED)
CTC (The National Cycling Charity)	Still not enough disincentives for motorists. Although the move is in the right direction with some non-car routes I don't think it goes far enough. Pedestrians and cyclists should have right of way over motorists. Pedestrian and cycling routes need also to be provided into town from Day 1. The Bridleway is not a suitable route as it is narrow and fenced and not all the population will feel safe as there is no	The aim to prioritise cycle and pedestrians and other sustainable modes of transport is a key aim of the SPD. It does not go into detail on the wider cycle connections or measures to prevent the estate road being used as a cut through. These are aspects which will be considered when further detail is available through the detailed transport assessments which are required to accompany future planning applications.	

	<p>escape route in case of trouble. A better route would be through Christchurch park, but this needs to be at all hours – a cycle route that cannot be used in rush hour in winter (when it is MOST needed) is no help to getting people to cycle/walk regularly. A school close to the railway will encourage people from outside the garden suburb to drive into it to drop of children – defeating the object of making it a car free zone! A road connecting Henley and Westerfield roads could become a cut through at rush hours unless there is a big disincentive to use. Any cycle route crossing this road should have priority.</p>		
<p>Public Health Suffolk - Suffolk County Council</p>	<p>1. Adherence to particular points in SPD highlighted: - housing density; community halls / mixed use district centre; home working; sustainable travels plans; environmental aspirations. 2. The scheme objectives must be supported by the Council through all the changes of the Council over the lifetime of the project. All housing developers must adhere to the objectives of the scheme throughout the lifetime of the scheme. 3. The spatial strategy supports public health and landscape objectives as well as health values from ecosystems. However the siting of the secondary school upon an area highlighted as an ASTSWF is of concern even with the SuDS scheme. 4. The provision of sustainable travel routes within the scheme highlights the need to develop more cycle and footpath routes into Ipswich town centre and to the rail station. 5. The trigger points appear to ensure a well thought out staged development. Public Health Suffolk considers that greater emphasis should be placed upon areas for teenagers within the development. One area is not sufficient and will see young people excluded from the centre due to the distance away from 'community' areas within the project. One / two more to cover the distinct areas within the development should be sufficient. Some of the s106 monies could be spent on ensuring adequate facilities for teenagers throughout the project. 6. Handing over communal land to a management trust may not prove cost effective and retaining this within the IBC portfolio will ensure continuity of maintenance, paid for by</p>	<p>1. Noted and adherence to these aspects will be considered at planning application stage. 2. The scheme objectives are supported by the present administration and whilst SPD is in place planning applications will be assessed and secured against this guidance. 3. The site for the secondary school has been considered in the context of the ASTSWF designation. The inclusion of school playing fields in this area would assist with overall drainage strategy and the school buildings can be, subject to details, designed to be suitable in this location. 4. Point noted and to be considered further as part of TA's to be submitted with planning applications. 5. SPD highlights need for mixed communities and ensuring well-being. Detailed strategies for achieving this to be set out in Community Development Strategy which could specifically address teenagers, as well as other demographic groups. 6. As stated in Chapter 9 of SPD, feasibility of this management option is to be explored further.</p>	

	the increase in community charge and business rates from the scheme.		
Suffolk County Council	<p>1. Most of comments from previous consultation stages have been taken into account. Whilst document contains more information, the vision and objectives could be clearer and the document should set out how the sustainability appraisal process has influenced the choice of spatial option. The linkage between the central community hub and sustainable objectives are present, particularly sustainable travel, and could be more clearly defined. 2. SPD raises the tension between support for excellent standards of urban design and the achievement of an exemplary sustainable development, but these are not separate and in many instances are inter-linked. 3. There is a role for the SPD to raise the issues of traffic and air quality, highlight the relevant policy and state how these very important aspects will be considered by the authority, as well as how they may impact design / layout of the development. 4. The vision and core objectives have been reordered and are not as clear as the previous Issues and Options Document. This chapter incorporates more physical and qualitative features, weakening the prominence of the objectives and suggests that those excluded from this chapter are not such a priority. Sustainable transport is not included in the vision where priorities are established in para 2.1. 5. The continued recognition of education provision is welcome and reassures this authority that the Borough Council treats the provision of education facilities as a priority. The reservation sites are also reassuring. As noted in previous response a new secondary school is need by 2020 and the SPD should support the earlier release of this site if needed. 6. The provision of recycling facilities within neighbourhoods (such as local centres) could be expressed more clearly than in Para 2.64. 7. The Council's requirements relating to heritage and archaeology should be clearly expressed. The County Council previously stated what work it expects to be undertaken to investigate the archaeological potential. 8. The County Council's previous response</p>	<p>1 & 2. Points noted and sustainability appraisal has informed the development of the SPD as set out on page 17. The spatial development of the masterplan has been subject to a number of factors as set out in the preceding pages 12-16. 3. The detailed assessments of these aspects are identified as being a part of the EIA to be submitted, once undertaken detailed mitigation and influence on design/layout can be considered. Traffic implications and impact on design/layout has been given initial consideration and incorporated into masterplan layout. 4. The Vision and Core Objectives for IGS are based over four themes which are considered to give emphasis to the key requirements and basis for the development of IGS which is grounded in national and local policy. Sustainable transport is specifically referenced within the connectivity theme and aspects which encourage sustainable transport is referenced in the other three themes. Para 2.1 is a list garden city principles from TCPA publication which are considered as a starting point for the IGS vision. 5. Reservation sites reference maybe removed following further discussion with SCC. 6 & 7. These matters are highlighted within the SPD and the applications will still need to accord with the relevant planning policies and advice from statutory consultees at the time the planning applications are submitted. With regards to waste and recycling this is highlighted in the objectives section and is expected to be further developed through submission of strategies required in chapter 10 (waste management plans and sustainability assessment which includes topic on waste). Similarly for heritage and archaeology these are specifically noted in the SPD as issues which need to be addressed and further detail is required through Archaeology Assessments and Heritage Statements as required in chapter 10 of the SPD. Substantial amount of information on Red House Farm and heritage implications is contained within SPD. 8. It is considered that these points are addressed in a balanced approach within the SPD. The joint working is implied throughout the SPD particularly on school and transport issues where discussions and agreement with SCC are referenced.</p>	

	<p>suggested: joint working between borough and county; greater weight and prominence to environmental sustainability; an exemplary approach to each phase, and a firmer commitment to sustainable transport.</p> <p>9. The document makes reasonable links between health and travel. The inclusion of references to meeting needs of older people, lifetime homes and neighbourhoods approach is welcomed.</p>		
RSPB	<p>Welcome that IBC are working with SWT to create space for nature and significantly enhance the overall biodiversity of the site. This is in line with the requirements of the NPPF which suggests development should achieve a 'net gain'. The provision of the Country Park is noted as essential in mitigating the likely increased recreational pressure on the main designated sites. Suds create opportunities for improving biodiversity and would also like to see green / brown roofs used on developments. Opportunity for improving hedgerows.</p>	<p>SPD sets out clear objectives with regards to sustainability, biodiversity, hedgerows and provision of country park.</p>	
Anglian Water	<p>1. pleased to see opportunity taken for integration of SuDS. Highlight that consideration should be given to proximity of trees to underground infrastructure like water mains / sewers. 2. Satisfied that water and sewerage are listed and the trigger point is 'as required'. Also noted is the inclusion of strategic SuDS infrastructure and connection. 3. Foul Drainage is a key infrastructure requirement and should be included. A foul drainage solution is needed and should be agreed before development commences and implemented before any dwellings are connected to the existing system. 4. Recommended that conditions applied to ensure suds and flood risk mitigation. Support delivery board and would welcome opportunity to become part of the board.</p>	<p>1. This would be considered at detailed stage. 2. Noted. 3. Noted as a key infrastructure item and delivery timing is 'as required'. 4. Points noted and appropriate conditions would be considered at planning application stage.</p>	
Rushmere St Andrew Parish Council	<p>1. In general quite acceptable. Wish to see more emphasis given to transport infrastructure at an early stage, prior to commencement of construction especially if there are multiple starts. Encouraged by emphasis on walking /cycling and encouraged by support for wildlife. 2. Concern with assumption that development will connect with existing highway network and no evidence that serious thought given to traffic which would result. Concern on</p>	<p>1, 2 & 5. A detailed Transport Assessment is required to be submitted as part of a planning application which include proposed traffic management and mitigation measures, as well as a construction management plan will need to be agreed before development commences. A range of parties have been involved in the production of the SPD in order to ensure that different groups and interests are represented and needs addressed. 3 and 7. The importance of management is recognised in the SPD and details expected as part of the planning application. 8. Construction</p>	

	<p>traffic not only with future residents but also resulting from construction traffic. A far more detailed traffic management survey and traffic management should form integral part of planning application. 3. Generally pleased with proposals. Noted that public open spaces, tree-lined streets and the like need careful management. Would be good to set management scheme in place from the outset. 5. Transport strategy is not sufficiently detailed. Whilst accepting that more detail at application stage, opportunity should not be lost at the earliest stage to bring in much more detail. Opportunity to consult in detail with Ipswich Buses, First Buses, Abellio Greater Anglia (Trains), Suffolk County Council (Transport) and others in regards to public transport as well as with groups representing cyclists / walkers / disabled people to ensure their needs are dealt with in detail at the earliest opportunity. 7. As mentioned earlier, long term management plan for areas other than resident's own property is wise planning. 8. Propose number of pre-requisites which relate to construction traffic routing; detailed plans for public transport proposals; and early provision of schools and shops etc.</p>	<p>Management Plans, Transport Assessment and Infrastructure Delivery Plans are requirements of the planning application and will inform and identify what is required and when to offset development impacts in relation to construction traffic, public transport and provision of community facilities. The details of these items and acceptability will be considered at the planning application stage.</p>	
<p>Ipswich Conservation & Design Panel</p>	<p>1. 'Conviviality' was suggested as additional key theme. This would draw on aspects of other themes such as character / connectivity and would ensure design supports social networking and placemaking. Particularly important given smaller parcels will be developed which tend to fragment rather than unify social aspects of the scheme. 2. The maximum build number (3,500) should be encouraged in order to provide much needed housing, support required infrastructure and support design objectives/placemaking. Mix of housing types / sizes/ tenures will need to be guided by housing need not developer economic imperatives. 3. Consider design content of the SPD to be high quality and likely to provide a good basis for the physical layout of the site and the development of a garden suburb character. Emphasis on retaining existing landscape features such as hedgerows was mentioned as a particularly appropriate design guideline. Strategy also makes best</p>	<p>1. It is considered that the aspirations of conviviality are included in the themes and the notions of promoting social networking and place making as noted in chapter 2 (see paragraphs 2.15, 2.17, 2.23, 2.32, 2.34). 2. Numbers of residential units is set in planning policy. Higher densities in local and district centres are noted as being considered appropriate in the draft SPD. Para 3.22 links phase by phase negotiations on mix with latest available evidence on housing need. 3. Climate Change is a key theme and core objective for achieving this includes measures relating to code for sustainable homes, renewable energy source and passive design measures. Core Strategy includes policies on sustainability measures required and viability considerations. Achieving suitable code levels may require maximising south facing roofs where possible, this will be assessed at detailed stage. 4. Para 2.16 identifies as part of Council's vision and core objectives that distinct sense of place through high quality urban design and architecture. 5. Transport Assessment to be submitted with planning application is required to inform more detailed aspects of station improvements, bus routes, car parking requirements. Residential car parking section in chapter 5 sets out preference for on-street / on-plot parking but noted that some</p>	

	<p>use of topography, for instance in the positioning of the Country Park and placement of housing in relation to natural drainage patterns. Need to maximise south facing building orientation was highlighted but needs to be balanced against placemaking objectives and concern overall sustainability could be vulnerable to cost pressures. Agreed 'village' concept is a good spatial organising strategy. 4. Generally happy with design approach. Design excellence should always be welcomed even if proposals break the mould within overarching masterplan. 5. Cycle route does not show how it continues south to connect to town centre. How car parking provided and front gardens is protected? Would like to avoid court yard parking. Westerfield Station improvements too vague. Development provides opportunity for east - west bus route. 6. How are infrastructure items secured should bonding be noted? Considered infrastructure plans and trigger points were comprehensive and anticipate the likely requirements of the community as the development grows. Concern that 35% affordable housing subject to viability testing. 7. Panel agreed management/maintenance of site should be community based and community development strategy would be best way to achieve this. Panel emphasised need to provide social facilities early on.</p>	<p>mews courtyard parking maybe acceptable subject to further design work to demonstrate appropriateness. Securing front gardens will be subject to consideration at planning application stage. Connections to cycle routes beyond IGS will need to be undertaken following outcomes of detailed Transport Assessment. 6. Securitisation of infrastructure through bonding is appropriate to consider at application stage once details of delivery of infrastructure are identified and considered. Viability testing of affordable housing is set out in Core Strategy policies. 7. Infrastructure requirements table identifies temporary community facility to be provided prior to occupation of first 50 houses.</p>	
Suffolk Wildlife Trust	<p>1. It should be ensured that the development proposals take full account of the existing biodiversity value of the area and protect this. 2. Welcome the Country Park but advise that it should be provided along with the associated green infrastructure links, during the first phase of any IGS development and are ready for use prior to occupation of any new dwellings. 3. Long term management plans which incorporate beneficial management for biodiversity should be secured. 4. Recommendation of restoring area of land around Redhouse Farm to parkland not taken up which is regrettable. The protection and adequate buffering of these trees, along with the hedgerows across the site, should be secured as part of this</p>	<p>1. Noted and application requirements in SPD include references to documents which require this. 2. Bringing forward Country Park will be considered in revised triggers. 3. Ch 9 requires details of long term management and maintenance plans to be agreed and allow for biodiversity aspects to be secured. 4. Requirements for future planning applications includes requirement for Arboricultural survey and Landscape Plan, Heritage statement with particular regard to setting of Red House Farm complex. It is expected that together these documents will assess the tree and hedgerow quality and contribution to landscape setting in this particular area and set out protection measures to retain them. The importance of these trees / hedgerows are noted in the SPD and will be expected to be addressed accordingly in the future planning applications.</p>	<p>A separate trigger for design and landscape work to be agreed and commenced has been added to revised infrastructure tables, in order to allow for earlier planting and works to begin on Country Park. Fonnereau neighbourhood is expected to be the first site within IGS to</p>

	SPD.		begin development, the Country Park is however associated with the Henley Gate neighbourhood so triggers need to be linked to dwelling occupations in Henley Gate.
St Marys Church of England Primary School	1. There may be future pressure from the developments in IGS on St Margarets Primary School and its future expansion does not take account of this additional pressure. 2. Large increase in traffic as a result of development could have implications on families travelling to school in a safe and timely manner. Further submissions by IBC to SCC to consider new trunk roads to ease impact on existing road network are needed.	1 & 2 Suffolk County Council who are both education and highway authority for these matters, have been involved with the SPD production and will continue to be through the application process.	
Environment Agency	1. Clarification of the quantum of dwellings to be allocated through the SPD is essential so that there is clarity for matters such as necessary drainage, waste water and sewer network provisions. 2. Re. Figure 5 (p37) the provision of additional informal open space on the southern and south western boundaries would add useful green space between existing and proposed residential development. 3. Noted that SPD includes reference to 'strategic improvements to sewerage system' with a trigger point of 'as required'. Whilst noted that Infrastructure Delivery Plan is requirement of the planning application, the necessary upgrades and capacity issues should be explored prior to submission of an application which is supported by para 162 of NPPF.	1. SPD is written on basis that the number of dwellings will be up to 3,500 dwellings in line with Core Strategy Focussed Review. 2. The appropriateness of a green buffer to these edges is recognised in Figure 6 on page 49 where soft landscaped edges are indicated. 3. Application requirements set out on page 157 includes a Utility Infrastructure Report as part of the Environmental Impact Assessment. Anglian Water do not object to this trigger point. Developers and Anglian Water are in discussion on what capacity improvements will be required. This detail is not available at present for inclusion in SPD.	
The Church of England Diocese of St Edmunds bury & Ipswich	1. Highlight existing communities concerns with traffic and the use of potentially conservative figures for peak period traffic in Hyder report. Commented that vehicle movement impacts not effectively evaluated. Mitigation options such as northern relief road and cross Ipswich buses need to be considered and determined. 2. Comment that community development personnel help the development of community and Diocese hopes to propose that an	1. Traffic modelling has been undertaken by SCC who have not objected to this amount of housing at IGS. Further transport assessments will need to be undertaken to detail the impacts and necessary mitigation required. 2, 3 & 4 SPD sets out requirement for community development strategy. This is expected to accompany a first planning application and be progressed as the developments progress. The points raised are noted and can be progressed between appropriate parties but at this stage it is not considered appropriate to go into this level of detail in the SPD.	

	<p>embedded faith worker is selected in this role. It is noted that such a post would need to be supported for at least ten years. 3. Comment on intention to offer to manage future community facility, possibly in partnership with other ecumenical partners. 4. Commented that whilst it would be good for the Diocese to bid for the secondary school, being able to have one of primary schools would be a positive option at an early stage. In particular noted that advantage of bidding for first school built in Fonnereau zone would be attractive to developers due to reputation of C of E schools and potential to run school alongside community facilities which would provide better and more sustainable management.</p>		
Westerfield Parish Council	<p>1. Pleased to see design has implemented concept of a 'green buffer' between development and the village in line with policy statement in the Core Strategy. 2. Comment on drainage and work undertaken to address concerns of impact in that regard on Westerfield. Would like assurance that the management of the system will continue to be under review in light of actual performance and climatic changes. 3. No mention in SPD of how foul waste will be managed. Would like IBC to continue to pressure Anglian Water to produce a detailed plan on how waste will be managed and in meantime a statement on the subject needs to be included in the SPD. 4. Both the District Centre and Secondary School are accessed from Westerfield Road, and as a result the road may lose its rural character. This is considered important in retaining the rural separation between borough and the village, and it is hoped that developers take this into consideration with a sensitive design response. 5. Extremely concerned over increase in traffic. There is currently no acceptable proposal to deal with this extra traffic. The SPD gives no details of the impact this additional traffic will have on existing junctions near the development and additional traffic through Westerfield. A great deal of modelling has already been undertaken and extracts of this should be included within the SPD to demonstrate the overall effects and any mitigating measures that need to</p>	<p>1. Noted. 2. Details of the SuDS scheme including adoption and supervision will need to be submitted and agreed as part of the planning application. 3. No details are available yet. Anglian Water are in discussions with developers on how this will develop. Details of such infrastructure improvements are required through the Infrastructure Delivery Plan to be submitted with a planning application and identified as a strategic infrastructure requirement in chapter 7 of the SPD. 4. Figure 6 on page 49 identifies these areas as important contributions in terms of informal /rural landscape areas in the Place Making Strategy. Para 3.32 on page 43 also recognises the need for the design approach to the District Centre to balance the need for a visible, legible layout with the retention of important landscape features such as trees and hedgerows. 5. SCC as highway authority have not objected to this amount of housing being identified for this site. Some modelling work has been undertaken by SCC and the results have been used to inform the Transport Strategy. Further detailed assessment is necessary to inform the mitigation required. Westerfield is specifically identified for traffic management scheme in the strategic infrastructure requirements in chapter 7 of the SPD.</p>	

	be provided to offset these effects. The traffic impact analysis should thereafter be done following individual applications from the developers.		
English Heritage	1. English Heritage would welcome the inclusion in the SPD of guidance ensuring the significance and setting of listed buildings close to north boundary of IGS is conserved. 2. It is also noted that the Sustainability Appraisal Report for Policy CS10 of the focused review highlights the proximity of the listed buildings and makes recommendation that could be picked up in the SPD. 3. Welcome inclusion of Red House Farm within the SPD area as a non-designated heritage asset. Whilst there is no specific mention of archaeological issues, it is noted that protection of archaeology forms part of the green infrastructure principles and that archaeology and heritage statement will be required with any planning application.	These points have been considered and it is agreed that the SPD could be improved in terms of ensuring these matters are fully considered. It is therefore proposed that an additional paragraph is added within the 'Character' theme of the vision (page 22-23) which highlights the contribution the historic and cultural heritage of the surroundings can make to establishing character within IGS and setting out an objective to conserving the setting of listed buildings and taking into consideration the wider cultural heritage of the area.	Amendment to vision and objectives of SPD to address historic and cultural heritage opportunities.
Tuddenham St Martin Parish Council	1. Believe the consequences of traffic have been underestimated and concerned with assumptions used in traffic modelling used to date. Welcome the further work on transport strategy to be undertaken but are concerned that traffic strategy assumes residents will not use cars to travel to work. Would like to see where such a strategy has proved successful in a comparatively urban area. 2. Other brownfield sites in Ipswich should be developed first. 3. Surprised there has been no consultation between IBC and Greater Anglia. 4. Major concerns with late delivery of secondary school. 5. The Country Park should be provided in parallel with the onset of development. 6. Concerns that foul effluent may be routed to Donkey Lane treatment works in Tuddenham St Martin.	1. SCC who are highway authority have advised on the SPD and have not objected to this level of housing being identified for the SPD site. The Transport Strategy is based on the assumption that people will use cars to get to work but that the level could be reduced by encouraging the use of other modes of transport. 2. Core Strategy issue. 3. Greater Anglia's future commitment to passenger services on the Lowestoft and Felixstowe line is noted in the SPD (para 6.23). 4. Suffolk County Council have been involved with document and have not objected to the infrastructure delivery proposals contained in the document. 5. The Country Park delivery is associated with the adjoining Henley Gate neighbourhood and on that basis the trigger for this is linked to the occupation of houses in this neighbourhood. Early tree planting and landscaping details could be considered at an earlier stage to assist with the establishment of trees and natural landscaping by the time the Country Park is opened. 6. The implications on foul effluent infrastructure are required to be further assessed in the submission of the planning application as specified in the SPD page 157.	Look at revision to infrastructure tables to assist with early trigger for planting in Country Park.
Suffolk Coastal District Council	1. Country Park is seen as critical in reducing the impact of the development on adjoining communities in Westerfield village and its early delivery is therefore supported. 2. Significant traffic movements would be generated but development also provides opportunity to increase footway and cycle links between Ipswich, Westerfield Station and Westerfield village. 3. Mitigation measures should also be introduced to	1. Noted and consideration of bringing forward delivery through triggers will be considered. 2. The Transport Strategy within the SPD includes incentives for sustainable travel modes and mitigation / management of traffic impacts. 3. Mitigation measures for Air and Noise impacts would be identified through EIA submitted with individual planning applications which is included as a planning application requirement on page 157. 4. Noted.	A separate trigger for design and landscape work to be agreed and commenced to be added to revised infrastructure tables, in order to allow for earlier planting

	protect the character of Westerfield by minimising the air and noise pollution which would result. 4. Supports the intention to bring forward the delivery of the Northern Fringe in order to ensure a supply of housing land within Ipswich Borough to meet identified needs.		and works to begin on Country Park.
Ipswich Society	1. Urge a brownfield first policy, particularly brownfield in preference to quality green-field agricultural land. 2. Makes great play on need to create a sense of place. Community is only intangible objective and will require communication motivation and achievable outcomes. 3. Balance between housing and shared facilities is both ambitious and clear. Target number of houses is supported. 4. Disappointed that the 'masterplan' is becoming 'grid-like' in its concept. We urge developers are experimental and innovative in their planning. 5. Trees and soft landscaping are key to garden suburb. Concerned by number, type and timing of planting, as well as future maintenance of front garden landscaping treatments. 6. Frontages to Westerfield Road and Henley Road are important to maintain character. 7. Would like to see provision in the SPD to ensure adequate bin storage and sufficient pavement space for all users. 8. Individual housing design needs to be realistic and flexible for growing families. Innovative solutions to create quality useable spaces. 9. Innovative thinking and alternative solutions to address car usage. Notes on car parking design and adequacy, and designing in traffic calming on proposed streets. 10. Like the provision of triggers but would not want to see this become a barrier to development.	1. Core Strategy point. 2 and 3. Points noted and to be progressed through planning applications. 4. It is noted in the SPD that in general terms streets should observe the grid approach. But is not intended to remove innovation or interest but ensure a strong urban form to the layout. 5. A strategy to accompany planning applications covering these concerns is noted in para 4.36 on page 68. Consideration of content and acceptability will be undertaken at planning application stage. 6. Noted and reflected in Figure 6 - Placemaking Strategy. 7. Block design principles includes notes on making sure there are well thought out strategies for bin storage that support attractive frontages. Street design principles includes notes on pavement width. 8. Minimum requirements for gardens are identified on page 106 and minimum floorspace standards are noted in Development management policies. Usability and quality will be considered at planning application stage. 9. The SPD identifies principles for reducing cars which are intended to be further explored in detailed transport assessment which accompany planning applications. Design chapter also looks into design solutions for car parking and includes street design principles intended to create attractive and safe spaces (para 5.5). 10. Infrastructure triggers are intended to be indicative and subject to an Infrastructure Delivery Plan being submitted with an application. This enables triggers to be adjusted in light of more detailed work on realities of bringing the development forward.	
Natural England	SPD should identify the need for the Country Park as an essential mitigation requirement to divert additional recreational pressure associated with development, away from European sites (as identified in the Ipswich Core Strategy Appropriate Assessment). SPD should also specify that the Country Park will be designed and managed to ensure it will deliver this mitigation requirement.	Consider adding reference to this in SPD.	Add wording to paragraphs 3.15 and 4.9 of SPD to reflect advice given by Natural England to identify Country Park requirement and specify that Country Park should be designed and managed to ensure that it

			will deliver the mitigation requirement identified in the Appropriate Assessment.
NHS Property Services Ltd (on behalf of NHS England) - Lawson Planning Partnership Ltd	<p>Welcome the recognition that IGS would need to enable the funding of a wide range of highly accessible on-site community facilities sufficient to meet existing and future residents needs, together with proposal that community facilities will be located within easy walking distance of as many homes as possible. Object to the proposal that District Centre would deliver a 'reserved site for a health centre'.</p> <p>Already identified by NHS in previous consultations (copy of comments dated 22/02/13 attached with response) that in order to mitigate the healthcare impacts, the land required for the phased construction and fitting out of the new health centre floorspace would need to be provided and fully funded by the developer and brought forward in accordance with a planning obligation and phasing plan agreed with NHSE and IBC. As it stands SPD does not provide for adequate mitigation and would fail test in para 204 of the NPPF and Sec 122 of the CIL Regs. SPD therefore requested to be amended. Intention to provide parking in District Centre on a shared basis for all users is noted, but NHSE wishes to highlight the importance of providing for all the reasonable operational parking demands of a health centre incorporating essential car users along with appropriate provision for visitors. Does not adequately provide for healthcare capacity mitigation and should identify need for developer funded health centre to be provided.</p>	<p>Consideration will be given to amending infrastructure tables to align with comments. With regards to parking paragraph 5.54 identifies the need for a car parking strategy which will need to set out how car parking needs are met whilst supporting good urban design.</p>	<p>Amend para 3.26 (page 42) and Infrastructure table to include required health care facilities.</p>
Mid Suffolk District and Babergh District Council	<p>1. Concerns that housing growth will need to be accompanied by short to medium term improvements in transport infrastructure. The implications for traffic generation on the A14 capacity and resilience will need to be addressed, e.g. in respect of Orwell Bridge closures and calls for assessing need for a northern bypass. Traffic management will be needed to prevent unsuitable local roads being used as a short cut to the A14, for example the narrow Church Lane, Claydon and Church Lane, Bramford.</p>	<p>1 and 6. More detailed assessments of traffic impacts are required in detailed transport assessments to be submitted with planning applications. From this the appropriate mitigation can be determined. Traffic calming and management is identified in the SPD the exact locations of this and whether it extends to the lanes mentioned will need to be determined following the detailed TA work. It is suggested at para 6.36 that the proposed railway bridge within the site, could be equipped to prevent access by private cars at certain times in order to manage traffic flows where necessary. The details of this and whether it was a suitable strategy would need to be considered in</p>	<p>Para 6.36, Page 130 – Clarity to be added to this paragraph that managed access to the railway bridge will be subject to consideration of the detailed transport assessments to be submitted.</p>

	<p>2. Chapter 2 - In general consider it to be well thought-out and comprehensive plan for the area. 3. Chapter 3 - Mix of homes, amount of public open space and local facilities should enable a garden suburb feel to the development. 4. Chapter 4 - Final quality will depend on adequate infrastructure provision, to achieve sustainable development, within the constraints of overall viability. 5. Chapter 5 - Significant amounts of advance planting and landscaping should be required to allow the green infrastructure to settle and mature during the construction phases. 6. Chapter 6 - Whilst pleasing to see a range of measures to encourage sustainable transport into and out of the site, the lack of employment opportunities will inevitably lead to outward commuting and increased vehicular movements. Of particular concern are the impacts on Henley Road and Westerfield Road and would therefore like to understand what traffic management measures could be put in place (other than speed limits) to discourage this. Would also like an explanation of why access to the new railway bridge would be restricted at certain times - what is the impact on traffic flows? Interested in how IGS proposals would relate to other parts of Ipswich fringe area, including - links between IGS, employment/retail areas and the A14, and implications for traffic and new buses; relationship with possible future development site (e.g. Sproughton sugar factory and Whitehouse / Anglia Retail Park); increase in rail freight traffic on Ipswich to Felixstowe line, including night time trains. 7. Chapter 7 - Concerned by lack of employment opportunities on site and resultant increase in commuter traffic. Cycle / walk links facilitate town centre destinations so does not relieve traffic pressure for those that need to travel elsewhere. Resultant traffic must put pressure on for need to re-assess need for Ipswich Bypass. Other infrastructure considerations should include future demand for public open space, sports pitches, countryside access, cycling and footpath routes in the wider Ipswich fringe area, as well as water supply/drainage/sewage capacities. 8. Chapter 9 - The management trust or</p>	<p>the context of the transport assessment data and results. Clarity on this could be added to SPD. 5. Ch 5: Point noted, phasing of planting and landscaping to be agreed through planning application process. 7. Ch 7: detailed TA's to be submitted with planning applications will further explore required mitigation. Need for sustainable links to other sites in Ipswich is recognised in Ch 6. Infrastructure table in chapter 7 includes open space and recreation facilities as well as utilities improvements. The planning application requirements in Ch 10 sets out supporting assessments required to identify improvements required in these areas. 8. Ch 9: Point noted and information required as part of the application requirements (Infrastructure Delivery Plan and Neighbourhood Management Plan).</p>	
--	--	---	--

	other such vehicle for managing open space must be agreed with the developers in advance to construction and confirmed in the S106 agreements.		
Sport England	<p>1. It is noted that Sport England are currently working IBC to develop a Playing Pitch Strategy and Sports Facilities Strategy for the Ipswich area which should be used in the development of the SPD and IGS developments. 2. Should be distinction between sports facilities required to meet the needs of new residents and those that are required to replace facilities that may be lost as a result of the development. 3. Final agreement on facilities should be made in consultation with Sport England and should reflect strategic work. 4. Need to secure a community use agreement to ensure delivery of facilities for community benefit at the secondary school. 5. Concerns with primary school facilities being used to meet open space / sports facilities requirements. 6. Do not agree with assertion that a MUGA will count as double the equivalent area of grass pitch, and each should be provided in response to the different policy and need requirements. 7. Agree that intensive use facilities should be floodlit to meet community needs. 8. Concerns that there is relatively little in the way of dedicated community sports pitches and single pitch indicated in master plan will be inefficient to maintain and provide. 9. Further work necessary to establish how the demand for community indoor sport facilities will be met. 10. Further work is considered best way forward to develop strategy for the provision, design and delivery of all indoor and outdoor sports facilities.</p>	<p>2. Para 4.18 - 4.22 identifies provision required to serve projected IGS population. 3. Noted in para 4.26. 4. Noted in para 4.26 and in table 1 of Strategic Infrastructure Requirements. 5. Noted and secured through planning process. 6. View held here that MUGA can count as double provision but precise ratio and provision can be determined through discussion. 7. Noted and recognised in para. 4.22. 8. Future management of the pitches is to be determined and at this stage it is not considered that the provision shown would be problematic. 9. As part of the planning applications to be submitted further detailed work building on the SPD with regards to sport facility needs and provision will be required. The strategy for sport provision can be developed in consultation with Sports England and included as part of the Infrastructure Delivery Plan.</p>	

APPENDIX 6 - NFPG SUMMARY OF COMMENTS

Source	Comment	IBC Response	Action Required
			(BLANK BOXES MEANS NO ACTION REQUIRED)

NFPG	Site is poorly connected to principle sites of employment growth as identified by both the 2013 Suffolk Growth Strategy and the New Anglia Local Enterprise Partnership 2014 Strategic Economic Plan. Greater employment growth in neighbouring districts. SPD therefore needs to be clearer and stronger on implications of commuting to employment sites, need for bus routes to sites of new employment and need to improve the Ipswich –Felixstowe train service.	Para 6.17 (page 126) of the draft SPD highlights this issue for further investigation in detailed Transport Assessments to be submitted with planning applications.	
NFPG	Traffic congestion, rat runs and air quality are concerns consistently raised. Frequent bus services and good cycle routes will not solve the problem. Present experience of UTMC is not positive and therefore major concerns with bringing this to north Ipswich / IGS area. Air quality needs to be assessed in this regard and also in context of DIRECTIVE 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe.	Detailed Transport Assessment and Air Quality assessments are required to be submitted with planning applications and will be assessed against relevant planning policy at the time planning application submitted. This will identify such traffic impacts and appropriate mitigation. The potential impacts and issues are outlined in chapter 6 (Transport Strategy) along with suggestions for mitigation. This has been produced in consultation with Suffolk County Council (Highway Authority) who do not object to IGS allocation for housing.	
NFPG	Concern with multi-start development and impact this will have on brownfield development. The controls set out in SPD should be included in the Core Strategy for completeness and clarity. Also SPD cannot set policy so inclusion in Core Strategy reduces risk of controls not being enforced.	Issue to be addressed in Core Strategy Focused Review.	
NFPG	Advocate that restrictions are placed on the number of sites operated by any one developer at any one time. Suggest limited to one main operational site per developer at any one time although these could be staggered as one site nears the end of development.	There is considered to be sufficient measures for securing and controlling the potential for negative impacts as a result of multi-starts in IGS without including such restrictions. For example Construction Management Plans, Infrastructure Delivery Plans, Design Codes etc.	
NFPG	Question whether statistical models used for drainage/flooding are adequate in reflecting changing weather patterns. SUDS proposals need careful assessment, sensitivity analysis and planning. Particularly as area is clay and prone to flooding in some locations. Although not convinced that the analysis and recommendations of the IBC drainage engineer provide a resilient enough solution and would argue for greater sensitivity modelling to be included, we would wish to see a solution that aligns with the judgement of professionals independent of the developers. We note that the IGS SPD SUDS proposals do not appear to provide a solution that fully fits with recommendations of the IBC drainage engineer. Given its importance would	The SuDS scheme set out in the SPD is to be designed to a higher standard than older traditional drainage systems and will include an allowance for climate change. The system would be designed to store runoff and release it at no more than the natural rate into the watercourse – the ground conditions are recognised as being unsuitable for soakage into the ground. Details of the SuDS scheme, including adoption and supervision will need to be submitted and approved as part of the planning application before construction can commence. SuDS does not have a separate land use budget as it is intended to be an integral part of design of the developments coming forward – for example designed within residential streets/areas or green amenity spaces. Exact size of SuDS required will depend on more detailed modelling and design work which will be developed at planning application stage. The SuDS details submitted	Preliminary SuDS Strategy to be adopted as part of the SPD

	prefer for SUDS to have separate budget provision in table 3.11.	with a planning application will be subject to consideration by IBC, SCC and the Environment Agency to determine its suitability. The preliminary SuDS strategy which sets out the IBC Drainage Engineer's approach will be included and adopted as part of the SPD.	
NFPG	Infrastructure table 1 – for Fonnereau Way cycle / pedestrian bridge, risk that development reaches 299 homes on Henley Gate then stops for several years, whilst other developments continue. This needs to be guarded against.	Point noted and amended wording to be added to infrastructure requirements to allow for delivery in light of sequencing information.	Revised trigger see appendix 14.
NFPG	Infrastructure table 1 – Traffic management scheme needs to specifically reference Whitton and The Dales as well.	'Other locations' are noted in the table and these along with appropriate mitigation will be determined through detailed Transport Assessment conclusions.	
NFPG	Infrastructure table 1 – Provision of country park and associated facilities also need to be included in Table 8b of the Core Strategy – we assume this is an oversight.	This is Core Strategy matter (item is included in Table 8a)	
NFPG	Infrastructure table 1 – Enhancements to school playing fields/ outdoor recreation for community use should include agreement of an acceptable access plan to enable community to use facilities throughout day.	Point noted and it is part of a wider set of details which would need to be considered and discussed at planning application stage.	
NFPG	Infrastructure table 1 – concerned that major infrastructure works will be required to allow sewage treatment from the Northern Fringe development at Cliff Quay STW and details should be included in this table.	Anglian Water are in discussions with developers on how this will develop. Details of such infrastructure improvements are identified in the infrastructure tables and would be addressed through the Infrastructure Delivery Plan to be submitted with a planning application.	
NFPG	Infrastructure tables 2, 3 and 4 – Travel plans should have requirement to include the commute from the Northern Fringe developments to the sites of new jobs in the Ipswich Policy Area as this will be major travel pattern of residents at peak times.	The travel plans will be expected to cover a range of points / issues which are concluded from detailed Transport Assessments to be submitted with the planning applications. The concern is noted but not considered appropriate to highlight this one particular issue in absence of other potential issues which may be concluded from TA.	
NFPG	Infrastructure tables 2, 3 and 4 – There is a risk that development stops at just below trigger points in table and no primary school / nursery is provided. How will this be addressed? Should be a minimum number of houses across all three neighbourhoods as a trigger point for provision.	The trigger points require a primary school at what are considered appropriate points in the development of housing and subsequent demand on school facilities. This will be better informed by sequencing information to come from Infrastructure Delivery Plans.	
NFPG	Infrastructure table 1 – Similar risk with secondary school as noted above.	Agreed. Action to be taken to address this in SPD.	Revised trigger see appendix 14.
NFPG	Infrastructure table 1-4 – By risking uncontrolled multiple starts across the Northern Fringe, theoretically 499 homes could be built without any new schools, local centre infrastructure framework, rail crossings or country park. This major loophole needs to be guarded against and closed through amendments to the Core Strategy.	The trigger points are considered to be appropriate and viable points in development to expect certain infrastructure to be provided. Detailed assessments, Infrastructure Delivery Plan and viability assessments which would be submitted with planning applications, may indicate otherwise and the SPD allows for this flexibility.	

NFPG	Concerned that major infrastructure works will be required to allow sewage treatment from the Northern Fringe development at Cliff Quay Treatment Works and the worrying lack of information from Anglian Water on this issue despite discussions in 2013. The Council needs to obtain assurances and greater detail from AW that the delivery of sewage infrastructure will be timely and affordable. AW's preferred solution should be included in chapter 7 and table 1 of the SPD, given its potential for disruption across Ipswich and affecting timing, size, cost-effectiveness of development.	Anglian Water are in discussion with developers on how this will develop. Council is kept informed of progress through regular Steering Group meetings. Details of such infrastructure improvements are identified in the infrastructure tables and would be addressed through the Infrastructure Delivery Plan to be submitted with a planning application.	
NFPG	The SPD omits any information on hydrology or topography. It's a major oversight which needs to be corrected. Currently not clear that SPD optimises the topography of the site – for example in relation to flood prevention / SUDS.	The Preliminary SuDS Strategy contains more detail on these aspects and will be included in the SPD.	Preliminary SuDS Strategy to be included in the SPD.
NFPG	Would like to see greater commitment for the eventual detailed design to be of the highest award-winning quality that will set Northern Fringe as the flagship standard for all similar developments to aim for.	Para 2.3 sets out IBC's requirement for IGS to be an exemplar sustainable urban extension. This focus on high quality is considered to be included throughout the document through the key objectives in chapter 3 and design principles in chapter 5. The realisation of this through detailed planning applications will be assessed by IBC.	
NFPG	Sections 5.44 – 5.46 specify the minimum rear garden space for properties, which we feel cram houses too close together for a garden suburb. Would like to see larger dimensions – suggest min back garden length of 12m and area of 100 sq.m. for a 3 bed and 70 sq.m. for a 2 bed property.	Garden sizes accord with adopted planning policy. Density is set at a level which balances desire to make most efficient use of this Greenfield site and still enables an appropriate character to be achieved. Minimum distances between certain house elevations are advised within the SPD to ensure sufficient spacing between properties (para 5.46).	
NFPG	House Type D (page 110) shows car parking in rear garden which contradicts section 5.45 which states back gardens do not include any rear parking spaces.	Para 5.44 sets the minimum garden sizes. Para 5.45 is making clear that rear parking spaces should not be included as part of the garden for the purposes of assessing whether the minimum garden size has been met. Para 5.45 is not stating that rear gardens cannot include rear parking spaces. Clarification on this needs to be added to para 5.45.	Para 5.45 amendment to clarify that rear parking spaces are not to be included as part of garden size for purposes of assessing against minimum standards.
NFPG	To avoid undesirable parking, would like to see minimum car parking standards which take account of today's larger vehicles and modern families which often have young adults which stay on in family house with cars – minimum parking spaces need to reflect this.	All parking would be considered against latest SCC parking standards at time planning application is submitted.	
NFPG	Sports pitch allocation of 12ha is inadequate for northern Ipswich where population data suggests that more sports pitch provision is needed for	Sports pitch allocation is an estimate based on likely population and based on Core Strategy requirements. Full provision of the 12ha is expected from shared school pitches. Access plan	

	central / north Ipswich. As this is last large green space in Ipswich, better use of site to maximise sport provision should be required. Also only 5.5ha is identified for formal open space which is to include sports pitches – so does not identify full 12ha required. Recognise that shared sports pitches proposed for school and community use but access may prove difficult – access plan should be agreed. There should be requirement for pitches to be on flat well-drained land.	and exact location and design details for pitches are part of a wider set of details which would need to be considered and discussed at planning application stage.	
NFPG	Clarification required of long-term management and maintenance. Not clear what proposed annual service charge would cover. Believe that it is fair and justified that SUDS and Country Park should be funded by SAB and IBC respectively and not through service charge. Would also expect roadside grass verges, trees etc should be funded through council tax as per other developments, but accept that a surcharge to cover maintenance of additional assets not typically enjoyed by other residents elsewhere in Ipswich may be appropriate.	The long-term management and maintenance of the public / community spaces requires further work and this is recognised in chapter 9 of the SPD. The points regarding the SuDS and Country Park funding are recognised and would form part of this work.	
NFPG	Disappointed that the foreword is misleading since it does not reflect the Council's position expressed in the Core Strategy Focussed Review. It gives the impression that development will not take place in other locations until after 2021, which is not the Council's intention as explained in para 1.10. The Focussed Review proposes the entire Northern Fringe to be allocated with multi-site development prior to 2021 as indicated in chapter 7 of the SPD.	The foreword was written in the context of planning policy relevant at the time. This will be updated as part of the full adoption of the SPD and wording changed to reflect its change from draft to adopted guidance.	Update foreword.
NFPG	Object to the deletion of the following statement from IBC's Vision Statement & Core Objectives "... the retention of existing on site vegetation – the retention of existing trees and hedgerows in the interest of biodiversity and in order to maintain and improve the canopy cover, which is a defining characteristic of the adjacent St Margaret's Ward." This goes against the sustainability principles and the garden suburb concept. IBC needs to reinsert this accordingly otherwise the public will have little faith in IBC's green vision.	It is considered that the very strong and clear green vision for IGS remains throughout the SPD. In particular the 'Character' theme for SPD vision clearly sets out the expectation that the garden suburb will be landscaped dominated which includes new planting, open spaces and the retention of the best of existing hedgerows and trees for nature (para 2.17). Further details on the importance of Landscape and Open Space within IGS is included on page 54 and refers to existing trees, hedgerows and woodland forming an important landscape feature and should be used to inform the layout and landscape strategy. The design principles includes provision for retaining hedgerows and trees. The master plan is set around the existing grid of hedgerows and significant trees. Further tree/hedgerow work is required to be submitted with future planning applications, to inform layout and biodiversity matters. The removal of the sentence highlighted is not considered to undermine the green vision	

		for IGS and is considered appropriate given that the outcomes of more detailed design and tree/hedgerow survey work may identify some trees / hedgerows as not being suitable for retention.	
--	--	--	--

APPENDIX 7 – SAVE OUR COUNTRY SPACES (SOCS) SUMMARY OF COMMENTS

Source	Comment	IBC Response	Action Required (BLANK BOXES MEANS NO ACTION REQUIRED)
SOCS	A key deficit within the SPD is the lack of assessment and possible necessary mitigation for impacts on Suffolk Coastal district Council adjacent villages. No mention is contained for this requirement; there is a duty under the adopted CS and joint SA work, to assess other LA growth plans and also mitigate for pressures on the local RAMSAR sites and Country Wildlife sites like Fynn valley which will be adversely impacted and put under intolerable pressure, both specifically, from this SPD area but also collectively, with other Local Authorities development proposals.	Some of these points are strategic in nature and would be considered as part of the Core Strategy policy work. For instance the Appropriate Assessment (2009) for the Core Strategy identified the need for a Country Park to mitigate the impacts of new development, on nature conservation sites and this resulted in the inclusion of the Country Park within the IGS site and as detailed in the draft SPD. The draft SPD does identify potential for traffic mitigation measures being necessary for rural roads para 6.49, more detailed assessment of this would be considered with further transport work to be submitted with planning applications. The draft SPD sets out the development framework for the site which includes a substantial green edge (made up of country park, school playing fields etc) to provide an appropriate buffer to the adjoining rural villages.	
SOCS	The change of SPD is likely to have 'unintended consequences' and are concerned that IBC will not be able to effectively act in the public interest when managing a multi-start situation. Present experience of smaller sites within Ipswich suggest this.	There is considered to be sufficient measures for securing and controlling the potential for any negative impacts as a result of multi-starts in IGS. For example Construction Management Plans, Infrastructure Delivery Plans, Design Codes etc.	
SOCS	SOCS strongly object to the "Option 2" "chosen" by IBC as in any case, it is a "Variant" on the original proposals not the original Option 2. As SOCS suggested last year, it is Option 4 essentially. Specific grounds on which SOCS object are, high densities proposed by David Lock for Red House site, which are out of character and not in harmony with the surrounding established residential areas; densities which are insensitive and fail to take sufficient account of the historic parkland, possible archaeological status, its undesignated assets and overall importance of the Red House site; this is added to concerns and failure to properly acknowledge the biodiversity and	Option 4 showed the secondary school within the Fonnereau neighbourhood. Option 2 was varied to bring together the community and commercial uses within more centrally located local and district centres in each neighbourhood. The Issues and Options report states that all the ideas from the community planning day and the rationale behind them were factored into the establishment of the three options put forward in the issues and options report. The draft SPD sets a range for density, which is considered an appropriate balance between making most efficient use of the land for housing and creating an acceptable development character. The exact density for Red House site, as with all sites will be determined at the planning application stage, the appropriateness of which will be considered in context and cover matters such as biodiversity and historic settings.	

	protected species known on the site to date. See Ministerial Statement 7/3/14.		
SOCS	Red House has the highest potential for flooding; a ground level water table which hydrological assessment might suggest renders the site unviable if the mitigation required for flooding and biological site features, TPOs, hedges and ditches as unviable and proposals as they stand, cannot be either practically or economically unachievable.	More detailed assessments to be undertaken at application stage to ascertain detailed mitigation. Work undertaken to date with regards to preliminary drainage strategy suggest site could be brought forward with suitable mitigation. The site has developer interest and no representations to suggest viability in this regard will be a substantial issue at this stage.	
SOCS	Consideration of the noise, vibration and traffic noise impacts from the hump back road/rail bridge elevation, separately and in combination, from both rail and road on the proposals and mitigation measures likely from the these impacts, should include an assessment for intensification over the plan period especially as Felixstowe Port is due for expansion with increased use of the Rail line planned. Environmental Impact Studies, which may be currently being commissioned, will need very careful independent scrutiny. Current rail noise levels have given rise to residents complaints and can be heard for a distance of about 1/4-1/2 a mile at night causing significant sleep disturbance especially in summer.	Noise and Vibration assessments are a specific requirement of the Environmental Impact Assessment to be submitted with the application (page 157 of the SPD). The consideration and acceptability of the assessment work undertaken and the subsequent mitigation requirements required will be advised on from specialist council departments.	
SOCS	Placing the two schools and a district centre will burden Westerfield Road as no access has been secured to Tuddenham Road. The cumulative effects from a secondary and two primary schools, a district and local centre, all exiting onto Westerfield road which is a narrow B class road, with the added barrier of a level crossing within the half mile stretch, is unsustainable and possibly unsafe. Assessment of the likely relative traffic movements for each of the Options should have been provided and influenced the option decision.	Westerfield Road and the access arrangements, are discussed on pages 130-131 and shown on figure 48 of the draft SPD. Further detailed assessment of the transport impacts and how these will be accommodated within the road network will be submitted with the planning application submissions. In principle Suffolk County Council as highway authority have not objected to the access arrangements shown but suitability will be subject to further detail to be considered at the planning application stage.	
SOCS	We note from recently delivered FOI material other developers also expressed dissatisfaction with Option 2 chosen by IBC especially regarding the secondary school sited here. We suggest that reconsideration given to the siting of this school is given an immediate high priority on sustainability and environmental as well as practical grounds. SOCS note para 3.43 on page 45.	The process of choosing the preferred option and noting the differing views between developers is explained in para 1.19 (page 12) of the draft SPD. The siting of the school on Red House site is concluded in the SPD as the preferred option and is taken forward through the document, with the agreement of SCC. It is not therefore intended for the siting of the school to be reconsidered at this stage.	
SOCS	SOCS, whilst supportive of the principle of the SPD in providing design guidance and master planning including infrastructure provision, note the draft	The SPD forms a guiding document which will inform the consideration of the planning application material and where necessary the planning permission would secure the elements which are	

	SPD only provides “guiding principles,”- no guarantees, especially for the green and open spaces including the country park, tree lined streets and retention of established trees and hedgerows. It was ineffectual at Hayhill road. How will this be any different?	considered necessary to make the development appropriate.	
SOCS	SOCS would like to see far lower housing densities and larger gardens more in keeping with the adjoining neighbourhoods and key to the proper spirit of “Garden City” design concept and the recently labelled “Garden Suburb”, which is a new “hybrid” concept, as yet untested.	Garden sizes accord with adopted planning policy. Density is set at a level which balances desire to make most efficient use of this Greenfield site and still enables an appropriate character to be achieved and deliver the garden city principles.	
SOCS	Page 20; If IBC were serious about a “Garden Suburb” concept, and had an adequate commitment to both the environment and climate change, why have they removed the following key statements and key pledges from their Vision Statement & Core Objectives? “.... <i>the retention of existing on site vegetation- the retention of existing trees and hedgerows in the interest of biodiversity and in order to maintain and improve the canopy cover, which is a defining characteristic of the adjacent St Margaret’s Ward.</i> ” <i>“plus all buildings should be designed to minimise energy and water use...”</i>	It is considered that the very strong and clear green vision for IGS remains throughout the SPD. In particular the ‘Character’ theme for SPD vision clearly sets out the expectation that the garden suburb will be landscaped dominated which includes new planting, open spaces and the retention of the best of existing hedgerows and trees for nature (para 2.17). Further details on the importance of Landscape and Open Space within IGS is included on page 54 and refers to existing trees, hedgerows and woodland forming an important landscape feature and should be used to inform the layout and landscape strategy. The design principles includes provision for retaining hedgerows and trees. The master plan is set around the existing grid of hedgerows and significant trees. Further tree/hedgerow work is required to be submitted with future planning applications, to inform layout and biodiversity matters. The removal of the sentence highlighted is not considered to undermine the green vision for IGS and is considered appropriate given that the outcomes of more detailed design and tree/hedgerow survey work may identify some trees / hedgerows as not being suitable for retention. Similarly reference is still made to resource efficiency within the SPD para 2.20, 2.62 as part of the aims of the developments and it is a requirement for application documentation to cover this in the detail.	
SOCS	Foreword of the SPD page 4, suggest that substantive development occurs after 2021; that is not what the CSFR is proposing.	The foreword was written in the context of planning policy relevant at the time. This will be updated as part of the full adoption of the SPD and wording changed to reflect its change from draft to adopted guidance.	
SOCS	From the Foreword “.. <i>in consultation with the local community</i> ”, Although the Draft SPD has been prepared “ <i>in consultation with the local community</i> ”, (also referenced page 12 ,1.16), it needs to be made clear, and should not imply, that the local community is either in agreement or that there is a consensus view.	The SPD is quite open about there being differences of opinion not only in the foreword where residents concerns are highlighted and it is noted that the SPD has sought to weigh and resolve conflicting priorities, but also in chapter 1 which sets out the issues which have been raised and the Council’s response to them.	

SOCS	Similarly, the public feel that implicit within the concept of “sustainable growth” is the pledge that North Fringe development will not <i>not adversely compromise future generations</i> . Attention to this detail is crucial as Mersea Homes have advised of their imminent Planning Application, which is ahead of this SPD process redrafting and yet, it is claimed, the SPD will provide, “... <i>firm guidance for any planning Application that might relate.</i> ”	As the draft SPD moves through the required process towards adoption it gains weight as a material consideration in the planning determination process. Hence the recommendation that the draft SPD is adopted as interim guidance ahead of the Core Strategy Focused Review adoption next year.	
SOCS	The SPD should go to Full Council.	The SPD will need to go to full Council after Executive, in order to approve the document.	
SOCS	Ipswich has repeatedly, over 16 years, failed to deliver on either it's pledge to “hold congestion at 1999 levels” nor has it stabilised or reduced air pollution - derived mainly from traffic (Ipswich no longer has a engineering or manufacturing base which might be a contributory factor.) It has a serious and growing air pollution problem which will be further impacted from these plans as the development is adjacent and will feed through the AQMA risk zones to travel to the town centre or to work or school. Hyder's SA assessment of this is flawed and disingenuous.	Air quality assessments would need to be submitted as part of the Environmental Impact Assessments for the proposed developments. This will ascertain any air quality issues and mitigation recommended. These will be considered by the Environmental Health dept within the Council and assessed against the relevant planning policies. Response to the Hyder point is contained in the SA/SEA response summary.	
SOCS	“ <i>loss of open land</i> “ It is not simply <i>the “loss of open land</i> “ that is being objected to; it is the unsustainable loss of “Best and most Versatile” grade two farm land that will “ <i>adversely compromise future generations</i> ”, and compromise the rural economy by the further loss of agricultural jobs. SOCS are constantly astonished that Natural England fail to exercise their responsibility and commitment towards this.	This is a concern which is addressed at policy level in the Core Strategy and is considered as part of the principle for developing the land.	
SOCS	“... <i>generous provision of green space, a sustainable drainage System and a new country park to the north of the site.</i> ” The allocations and allowance outlined within this draft SPD do not equate with “ <i>generous</i> ” in SOCS opinion and that of others. It is more like the minimum that can set aside, which may even be below the allowances recommended from expert sources such as Parks and Gardens, Environment Agency and the NFPG calculations according to the established methodologies.	The SPD allocations space allocations have been written in light of policy requirements as set on pages 38 and 39.	
SOCS	One example on page 13 is the allocated area and green buff zone is not consistent on different sites. Potential for nuisance / amenity problems from railway line noted and specialist advice	Noise assessments are required to be submitted with the planning applications and this will provide greater detail on mitigation required and extent of buffer zones necessary for residential development alongside the railway line.	

	required.		
SOCS	The area of Red House was suggested as having high density housing (43ha) around district centre and the historic core – which is a totally unsuitable density, adjacent to a Local List site, area of archaeological interest and former historic great park land which Suffolk Wildlife Trust suggest could be reinstated as park land.	The SPD does recognise that the density of housing could vary in response to higher activity areas such as local / district centres, this will be balanced with acceptability in terms of other factors such as historic contexts or biodiversity issues. This accords with Policy DM30 which enables exceptions to be considered to densities where site characteristics, constraints or sustainable design justify a different approach.	
SOCS	Page 8: Revision of the SPD boundary and The revised CSFR proposals map contains anomalies and certain presumptions on land use, access points, land availability and deliverability. SOCS suggest the map contains certain erroneous assumptions which appear to SOCS as “unsound” due to lack of assured deliverability. SOCS reject some of these proposed changes and incorporations of land.	The amendments to the SPD boundary is being considered as part of the Core Strategy Focused Review.	
SOCS	Figure 3: page 13 shows unacceptable and currently undeliverable access points to Red House. Page 33: Map shows undeliverable access points on Tuddenham Road and possibly to Valley road.	The access points noted have been included on the basis that they provide potential for future access routes. The details and acceptability of these will be explored in further detail as part of the planning application stage and as more assessment work on transport implications becomes available.	
SOCS	Land off Tuddenham Road owned by Ipswich School This land has significant access difficulties and it is felt is unsuitable position for this public access playing field.	This is not a matter being considered in the SPD. It is an issue which would need to be considered at strategic policy level.	
SOCS	Page 10: The Evidence Base; SOCS (and NFPG) have concerns i.e. on population, trends and Jobs; methodologies for modelling and projection are questionable as is the integrity of the evidence base, projections and various methodologies.	The evidence base is determined and assessed as part of the Core Strategy Focused Review work.	
SOCS	Page 16: Transport Assessments; Traffic Congestion NFPG and SOCS members and other members of the public have consistently raised concerns with IBC and Suffolk County Council over the impact of the development on traffic congestion, rat runs and air quality. We have major concerns over the proposed traffic scheme especially the replacement of the Valley Road/Westerfield Road and Valley Road/Tuddenham Road roundabouts with traffic lights. A full traffic impact assessment needs to be made of the Ipswich UTMC System before considering installing yet more traffic lights in the north of Ipswich. Recommendation -The need for significant traffic level assessments must be accepted by SCC and the	Detailed Transport Assessments are required as part of the planning application process as identified in chapter 6 of the SPD and set out in the application requirements in chapter 10.	

	<p>developers for the village areas in Suffolk Coastal, adjacent to the SPD area, so NPPF sustainability requirements are met, i.e. "no serious effects" can be determined and mitigation established if significant effects are found. This is a requirement under Localism and Duty to cooperate, especially as IBC is looking to meet substantive levels of its jobs growth targets from employment bases in other Local Authorities.</p>		
SOCS	<p>There is also a need to include a full assessment of the potential impact on air quality and the existing town centre AQMAs which traffic from the Northern Fringe is likely to flow through. This requirement should be specifically stated in the SPD.(See comments in the SA of the SPD)</p>	<p>Planning application requirements in chapter 10 (page 157) sets topics to be included in the Environmental Impact Assessment which includes Air Quality. Detailed assessments of air quality and necessary monitoring and mitigation will be determined at planning application stage in the Environmental Impact Assessment. These will be based on traffic modelling submitted with the planning applications. The SA report has identified that <i>"There are four Air Quality Management Areas (AQMA) within the Ipswich borough, all of which are designated for NO2 levels. All of the AQMAs are located within urban Ipswich and the closest is an area incorporating the Bramford Road/Yarmouth Road/Chevallier Street junction and part of Chevallier Street"</i>. The report also suggests that <i>"The air quality impacts of additional traffic within the locality and on the AQMAs must be assessed and strategies for limiting adverse impacts on air quality identified."</i></p>	
SOCS	<p>SOCS have repeatedly called for assessment of recreation use of routes beyond the SPD site including access by public to the Fynn Valley under Duty to Cooperate; likely impacts on the CWS and Fynn Valley need to be assessed.</p>	<p>As part of the EIA to be submitted with the planning applications it is expected to include an open space and recreation assessment on the wider area. The content of the SPD has been informed by policy information on recreational need and consultee input.</p>	
SOCS	<p>Transport assessment should also be reinstating former sensible, sustainably minded transport policies on Road Safety; collect data on accidents and from the increased congestion and apply commensurate targets for improvements and reductions in accidents. Policy statements and targets formerly suggested , such as "Pegging congestions at 1999 level" are a joke. Reassessment and recalculations of the SCC Traffic Reduction Strategy as a means of mitigation against "serious effects" from proposed development need to be done and set against current <i>actual</i> congestion figures and up to date modelling, as recommended in the Haven Gateway Report in 2009.</p>	<p>Up to date transport modelling will be undertaken as part of the detailed transport assessments to be submitted. This should include accident data and analysis as part of the assessment, and will be considered by the Highway Authority as part of the consultation process of any future planning applications for the site.</p>	
SOCS	<p>Recommendation SOCS suggest the reinstating of Landowner/developer's Section 106 obligations, which was removed at Examination in 2011,</p>	<p>S106 obligations will be considered and negotiated as part of the planning application process, once all necessary assessments have been undertaken and considered. It is at this point that the council will be</p>	

	<p>regarding contributions towards roads needed beyond the development site due to new development adverse impacts on congestion and pollution. Why have Ipswich Borough Council not allowed the known multiple impacts from new development on the transport system to be enshrined in the Core Strategy and to be properly recognised and identified and with adverse impacts on air quality, congestion, accidents/road safety issues comprehensively covered by Section 106 agreements? We recommend this is also reconsidered.</p>	<p>able to determine what S106 obligations would be necessary to ensure a development was appropriate in order to grant planning permission.</p>	
SOCS	<p>SPD Area Wrong location for employment. No matter how attractive the development there is no getting round the fact that the site is poorly connected to principle sites of employment growth as identified by both the 2013 Suffolk Growth Strategy and the New Anglia local Enterprise Partnership 2014 Strategic Economic Plan. As such the sustainability of the entire development is questionable. The only principle employment growth site identified within the Ipswich boundary is the Futura Park/Ransomes Europark expansion. The next two nearest sites are the Former Sugar Beet Factory and Adastral Park. None of these are within easy reach of the proposed Northern Fringe housing development by public/sustainable transport. Since sufficient jobs growth is unfortunately not forecast in the Town centre then commuting by car would seem inevitable, with traffic congestion becoming even worse than it is now.</p>	<p>Para 6.17 (page 126) of the draft SPD highlights this issue for further investigation in detailed Transport Assessments to be submitted with planning applications.</p>	
SOCS	<p>The SPD needs to be stronger in recognising that direct bus routes from the Northern Fringe to sites of new employment will be required. The SPD also needs to be stronger in recognising the need to improve the Ipswich – Felixstowe train service which has been reduced in frequency and substantially deteriorated in terms of reliability.</p>	<p>See above response with regards to bus connections to employment sites. The draft SPD is considered to address the point on improving train services sufficiently in order to form the basis for further investigation. See paragraph 6.21-6.24 (page 128) and Westerfield rail station / service improvements contained in the infrastructure tables in chapter 7.</p>	
SOCS	<p>If it is IBC's intention to sanction multiple starts across the whole of the Northern Fringe from the outset, we object to this, not only because of the negative impact on the regeneration of brownfield sites.</p>	<p>Impact on regeneration of brownfield sites is a CSFR issue.</p>	
SOCS	<p>Suggested Multi starts need to be assessed against new ECHR Ruling¹ and will mean that the most difficult site</p>	<p>There is considered to be sufficient measures for securing and controlling the potential for negative impacts as a result of multi-starts in IGS. For</p>	

¹ Residents of Copenhagen have won a significant victory in a battle to prove that freedom from noise pollution is a human right. Denmark's highest environmental tribunal has declared that the physical and psychological suffering caused by the sound of building work is unacceptable.

	with respect to constraints, Red House, will be under development pressure prematurely and before numerous significant constraints and environmental obstacles have been properly identified, let alone resolved or other more sustainable options properly explored.	example Construction Management Plans, noise assessments, Infrastructure Delivery Plans, Design Codes, Arboricultural surveys and Landscape Plans, Heritage statement with particular regard to setting of Red House Farm complex, wildlife surveys etc.	
SOCS	Multi-site development of the entire Northern Fringe from the outset will work against the CS spatial strategy set out in policy CS2 by undermining urban regeneration efforts. We note that the Northern Fringe SPD proposes controlling the risks of multiple starts as outlined in its "Approach to development sequencing" and "Implementation, Delivery and Monitoring" in Chapter 7. This is clearly the intention of IBC so we urge that these requirements, especially the proposed development sequencing and the requirements in Paragraph 7.31 are also included in the CS for completeness and clarity.	This is a matter to be considered as part of the Core strategy.	
SOCS	We also advocate that restrictions are placed on the number of sites operated by any one developer at any one time. We suggest that this be limited to one main operational site per developer at any one time although these could be staggered as one site nears the end of development.	There is considered to be sufficient measures for securing and controlling the potential for negative impacts as a result of multi-starts in IGS without including such restrictions. For example Construction Management Plans, Infrastructure Delivery Plans, Design Codes etc.	
SOCS	Data Gaps of serious concern within IGC SPD which may render the CSFR unsustainable;	Sufficient information and modelling is considered to have been undertaken to inform the SPD. Not all of which has been included but the main outcomes have been incorporated. Further assessment work is required as part of the planning application submissions which will go into more detail on specific issues and the necessary mitigation required.	
SOCS	Flood Risk management Suffolk SuDS Approving Body SAB. This is a key sustainability issue requiring new policy direction from within Strategic Planning and the Council. Planners and councillors need to be more aware of the changing nature of drainage, and flood in relation to new development; to be more aware of the direction of the new legislation and acknowledge their future responsibilities to effectively manage alongside the engineers and drainage experts in planning matters. There appears to be a worrying lack of ownership of these issues by strategic planning and planning officers who must assume <i>more</i> responsibility in the future in tracking and factoring in the issues. No longer can strategic planning abdicate responsibility	SPD is clear on potential drainage issues and requirements for future development and planning applications. Para 4.56, page 74 reiterates this and the need for this to be agreed and incorporated into relevant planning agreements.	

	for these issues as was the case in the past, nor can uncoordinated approaches to solution be allowable as responsibility for on going management of key infrastructure transfers to the public realm and householders via levies.		
SOCS	<p>Land use and page 36; table of land use allocations; needs reassessment and rewriting to separate out SuDS from “residential” allowances as this will have a significant impact on possible densities if SuDs are given the correct required allocations.</p> <p>The 10% likely for SuDS referred to within the SPD, does not equate with what we told at the CSP which was 12%. It does not take proper account of the IBC SuDS recommendations.</p> <p>Further allowances may be needed to mitigate for hydrology, hydrolysis data and possible changing patterns of climatic events. These factors will erode the land available for homes, currently assessed at about 90 ha within the SPD, and will impact on likely densities that can sustainably be achieved. This in turn will impact on “Garden Suburb” and Design approaches. It will undoubtedly impact on viability and may render Red House, with its numerous other difficulties, undeliverable and unachievable.</p>	SuDS does not have a separate land use budget as it is intended to be an integral part of design of the developments coming forward – for example designed within residential streets/areas, green amenity spaces. Exact size of SuDS required will depend on more detailed modelling and design work which will be developed at planning application stage. The SuDS details submitted with a planning application will be subject to consideration by IBC, SCC and the Environment Agency to determine its suitability.	
SOCS	Issue 5 Infrastructure Table 1-4 (NFPG) - We support the inclusion of these tables in the SPD and similarly Table 8b in the CS. Although we have a have a number of concerns we believe these can easily be addressed.	See detailed responses to NFPG comments on these items (Appendix 6).	
SOCS	<p>Issue 11 Sports Pitch Provision</p> <p>Section 3.16 of the SPD recognises a provision of 12ha is required to comply with the Core Strategy Appendix 6 but that the formal open space, which includes sports pitches, amounts to 5.5ha i.e. a deficit of at least 6.5ha. Appendix 6 of the Core Strategy specifies 1.53ha outdoor sports space provision per 1000people. There is already an under provision in Ipswich particularly in the North and Central Areas. Also we note that the population of Ipswich was shown in the 2011 Census to be much higher than expected and the latest EEFM 2013 Ipswich population forecasts are significantly higher than the EEFM 2012</p>	Sports pitch allocation is an estimate based on likely population and based on Core Strategy requirements. Full provision of the 12ha is expected from shared school pitches. Access plan and exact location and design details for pitches are part of a wider set of details which would need to be considered and discussed at planning application stage.	

	<p>data used in the Cores Strategy focussed review.</p> <p>We request that the 12ha requirement is reassessed in the light of such evidence and suspect it to be an underestimate of that needed to meet IBC's required standards for the Central/North areas. The Northern Fringe is the last major area of greenspace within the Borough that could be used to address the deficit in publicly available outdoor sports provision and IBC should give this appropriate consideration rather than make the situation worse.</p> <p>The SPD refers to 'additional provision should be made at the secondary and primary schools where all-weather pitches and shared community use is sought'. This may not be so easy to achieve since free schools/academies are free to make their own decisions and that schools normally require access to such facilities both in and outside of schools hours. Any such shared facilities should include the agreement of an acceptable access plan agreed with the local community to enable community use of facilities during both school and non-school hours. Any sports provision on shared sites that is not regularly accessible to the general public during school time needs to be topped up by additional facilities on a pro-rata basis. There should be an additional requirement included in the SPD for all sports pitches to be provided on well-drained flat land.</p>		
SOCS	Specific concerns surround; CUMULATIVE EFFECTS; and COMPOUND EFFECTS. Construction noise together with rail, road noise and vibration impacts.	As part of the noise assessment in the EIA, cumulative impact assessments will be expected.	
SOCS	SOCS ask what contingencies are proposed and safeguards built in if effective mitigation cannot be achieved, (from viability, deliverability or both) particularly with congestion from traffic, pollution and flood risk? This was a requirement outlined in the 2011 SA/SEA.	Mitigation considered necessary in order to make an application acceptable in policy terms will secured through condition / legal agreement. Breach of these will be subject to enforcement action.	
SOCS	Viability is another "Elephant in the Room" and SOCS note with concern, developers frequent reference to this within the DSG minutes. Are the ENTIRE existing population just going to have to "lump it" as has been intimated at various meetings, ie "no gain without pain", and questionable gain/ benefit at	The importance of viability to a development scheme is recognised. The affordable housing levels to be provided alongside infrastructure contributions will be considered in light of detailed viability work to be submitted with a planning application and independently verified. The necessary infrastructure contributions and affordable housing levels appropriate will then be	

	<p>that? Most serious of all, <i>if</i> the IGC area is not successfully delivered or competently managed, there will be profound adverse consequences for future generations.</p> <p>SOCS suggest failure or slow delivery may also reduce "IBC flexibility", have the potential to undermine any new adopted CS and further destabilise the potential for Ipswich to either recover economic stability or to grow successfully.</p>	ascertained within a policy context and the light of the viability conclusions.	
SOCS	<p><i>Who</i> do the public perceive will benefit?</p> <p>One school of thought is that expansion and growth in Ipswich is a push for Unitary Status to achieve more IBC based control and autonomy. This may be a legitimate aspiration but what are the inherent risks and what interim pain and cost will be incurred by local residents in the intervening period? The public have repeatedly rejected these growth plans but feel ignored. Legitimate arguments have been countered by IBC moving the goalposts.</p>	Disagree. The SPD is being produced to deal with the housing need identified for Ipswich and in order to achieve a well-planned comprehensive development for north Ipswich.	
SOCS	What confidence do the local population have in IBC's competence and ability to manage this complexity with ever reducing resources?	The SPD is intended to assist with the determination of planning applications in IGS and provide a more robust policy basis from which to determine the acceptability of proposals submitted.	
SOCS	Lessons to be Learnt from experiences of the past. Difficulties at Hayhill Road Site persist. The North Fringe Ipswich Garden Suburb many of the informed public feel is likely to be another Hayhill "Volume Build" bland, dense urban development on a much grander scale, but with the added complexity of multiple land ownership issues, significant complexity and constraints. Experimental Drainage SuDs at Ravenswood have had problems and 10 years on, Daimler Road Lovetuffs Drive is still far from resolved. It is likely that the Waters Act delivery will now be accelerated following recent flooding crisis in England. This will have a significant bearing on the local flood and drainage issues which developers and IBC/SCC will have to grapple with.	The SPD seeks to address or set out information needed, in order to avoid some of the less successful elements of other developments – such as design and drainage. There are always lessons to be learnt from previous developments not just locally but nationally. These often inform national good practice guides as well as the local knowledge of Council officers, and are used to advise developers and their proposals.	
SOCS	These various policies, Core Strategy, CSFR, IGS SPD, Site Allocations and Sustainability Work, sadly SOCS fear will not be knocked into shape by rational and reasoned argument. Only slow grinding prolonged debate and ever increasing "legalise" and horse trading between those who ultimately hold sway	The determination of planning applications does require the consideration of a number of policies and material considerations. There are often competing demands for developer funding as well as from policy requirements which need to be balanced when considering the acceptability of a planning proposal. This will be undertaken as part of the planning process and will be an open and	

	will determine what happens; from Central Government dictate and business and landowner pressures. Petitions and negotiation on “viability” and “deliverability” will effectively determine the outcome. We have been told CIL will not be agreed in time for this IGS SPD. Section 106 are currently disputed by developers.	transparent process.	
SOCS	Chapter 9; Comment on the New Policy Approach impacting on CSFR and IGC SDP as to responsibilities for on going maintenance and ongoing costs of key Infrastructure-Country Park, SuDS-Swales, Sports Facility in particular. This is a significant change of direction by IBC which is likely to have huge implications for the Public, financial and otherwise. This “policy decision” should go through due democratic process within IBC ahead of being proposed here. The public have a right to have their say on this.	The long-term management and maintenance of the public / community spaces requires further work and this is recognised in chapter 9 of the SPD. This does not preclude IBC from being an option for potentially managing the public open spaces in IGS. No decision on this has been taken as yet.	

APPENDIX 8 – OTHER INTERESTED PARTIES SUMMARY OF COMMENTS

Source	Comment	IBC Response	Action Required (BLANK BOXES MEANS NO ACTION REQUIRED)
Ben Gummer MP	Own questionnaire undertaken (copy enclosed with letter), 200 responses received. Conclude that residents share concerns about increase in traffic, pressure on local services, quality and design, % of social housing, and loss of wildlife. Whilst most respondents said if the Council were determined to build on the Northern Fringe they would prefer an “innovative development that will become a reference for exceptional urban design”. Current masterplan has a number of problems:- 1. The design fails to make best use of the topography of the site, giving an unnatural feel to the landscaping and making it more likely that flood alleviation will be intrusive and ineffective; 2. Traffic will be directed onto Westerfield Road and onto one roundabout with Valley Road, which will inevitably cause considerable disruption; 3. The new development is not knitted into the current fabric of the town; 4. There are excellent opportunities for Boris-style cycle paths into the town, to	1. Disagree, the land development plan has been set out to balance factors and take account of topography features as well as suitable access points for various land uses and retaining buffer and rural character for Westerfield village. 2. Disagree that considerable disruption is inevitable, detailed traffic modelling and impact on surrounding roads is still to be assessed as part of transport assessment to be submitted and subsequent mitigation to be identified. 3. Disagree, the SPD contains the basis and guidance for further work to be progressed to ensure the urban extension is integrated with the town – For example the Community Development Strategy, architectural design, cycle/pedestrian links. 4. Agree, that excellent opportunities for cycle provision exist and SPD sets framework for these to be progressed. The details of the cycle strategy will be progressed following the outcomes of the transport assessment which will fit within Suffolk County Council’s wider strategy ‘Travel Ipswich’. 5. Agree, there is no northern relief road planned, as the highway authority (Suffolk County Council) took the view, based on modelling work at the time, that a phased development of up to 5000 dwellings at the Northern Fringe could be accommodated on the	

	<p>the station and elsewhere, but none of these are suggested - indeed, the cycle provision as currently planned is lamentable; 5. There is no northern route to relieve pressure from Valley Road; 6. The design statements are insipid: there is no vision for an exceptional, Europe-leading development on this site; 7. The school, which will service the rest of north Ipswich as well as the new development, is put on the furthest part of the site, making it less accessible to current residents than if placed further south.</p>	<p>existing highway network without the need for new road building subject to a range of demand management and traffic management measures being introduced. 6. Disagree, that design statements are insipid. At the outset the Borough Council requires the IGS to be an exemplar sustainable urban extension (para 2.3). The SPD sets out as part of the vision and objectives of the area a theme of 'Character' which identifies the importance of creating a garden suburb with a distinct sense of place with high quality urban design and architecture. 7. Disagree that it would be less accessible, as it will be just as well served by public transport and foot/cycle routes as other sites in IGS. There are other locations within IGS which are physically closer to the existing town, but the identified location of the secondary school was considered appropriate and was a balanced decision for various reasons including: being sited alongside the primary school; providing a buffer between the proposed built development and existing Westerfield village through the siting of school playing fields. The location of the school playing fields are also considered an appropriate land use alongside the railway line and in assisting with the overall drainage strategy for the area.</p>	
<p>Councillor Mary Young</p>	<p>1. Concerned about the impact of these proposals on the volume of traffic particularly affecting north west of Ipswich. Town's road system at peak times is already stretched and near grid-lock, particularly when the Orwell Bridge has been closed. A relief road to west of this development towards the A14 would help alleviate this pressure. 2. Where will jobs come from for new residents? Until road infrastructure improved fail to see how Ipswich will attract major employers and developers will only build houses of confident they will sell. 3. Cycle routes into town centre need consideration and would not advocate north-south route through the park.</p>	<p>1. In giving consideration to the proposed allocation of land at the Northern Fringe for new housing in the Ipswich Borough Council Core Strategy and Policies DPD, the highway authority (Suffolk County Council) took the view, based on modelling work at the time, that a phased development of up to 5000 dwellings at the Northern Fringe could be accommodated on the existing highway network without the need for new road building subject to a range of demand management and traffic management measures being introduced. More detailed Transport Assessments are required to be submitted as part of the detailed planning application submissions, which should cover in more detail the impacts on roads nearby and mitigation required. 2. Core Strategy comment. 3. Cycle route connections will be looked at in more detail following Transport Assessment details.</p>	
<p>Councillor Inga Lockington</p>	<p>1. Proposed local plan and garden suburb documents need to be re-examined to take account of the newest Planning Guidance announced on 6th March 2014. 2. The Portfolio Holder statement on page 4 makes reference to the site being within 1 mile of the town centre which is correct for southern edge of the site but not the northern edge. 3. Two main concerns residents have are drainage and transport. 4. If proposal was a genuine 'garden city' then issues of drainage and transport would not be an issue, but it is a bolt-on suburban development attached to road and drainage systems which are already</p>	<p>1. In terms of the SPD the planning guidance recently published support the policies within NPPF which have been taken into account in the SPD. 2. Point noted and this can be reviewed when a foreword is written for adoption version of the SPD. 3. The level concern of these aspects is known and SPD is considered to include the basis from which strategies for each matter can be progressed to address those concerns. 4. It is recognised in the SPD that the development of the site would be an urban extension but vision is sought to be based on garden city principles. The infrastructure issues are identified in the SPD and the further assessment work required on each. 5. Detailed transport assessments are required to be submitted with future planning applications to determine the</p>	

	<p>at capacity. 5. Transport: detailed points regarding Country roads and Westerfield Road to north being at capacity and may need to be improved for cycle and pedestrians, as well as risk of rat runs on residential roads. Current changes to town centre traffic has pushed even more traffic north. Bus routes to employment sites should be planned and railway station should be located near Future Park. 6. Drainage: Site has poor natural drainage so unless we can get SuDS along roads which follow contours then we will have swales becoming and draining into ad hoc ponds gathering site water into lower contoured spaces. Restrictions on domestic development to preserve as much natural drainage as possible. Concerns about lying water and potential hazard this creates. 7. Concerns with foul drainage system and fresh water supply and potential disruption resulting from improving capacity. 8. Housing: any new housing needs to plan for age. 9. High School: Not clear that this is optimal location for the school.</p>	<p>impacts and the suitable mitigation. bus routes between sites to east and west of Ipswich is noted in the SPD (para 6.17) and new rail station is a strategic policy issue. 6. There is a preliminary drainage strategy which has been developed and covers these issues. The detailed strategy to inform the proposed developments is expected to build on this further. The maintenance and hazard matters will be part of the consideration of approving detail at a planning application stage, as will placing any necessary restrictions on pd rights for extensions and parking. 7. These are identified in the infrastructure tables in chapter 7. And requires further investigation as to how these will be provided. No detail is available at present to include in the SPD. Infrastructure Delivery Plans to accompany each planning application should detail this further. 8. Housing is identified in the SPD as being need for all sectors of the community and will be informed by housing need data from the Council. 9. The location of the secondary school was considered appropriate as it would enable a buffer to be created between the proposed built development and existing Westerfield village through the siting of school playing fields. The school playing fields could also assist with drainage strategy as they would be situated in location which is at risk of surface water flooding and would also provide a buffer to railway line. The fact it is further from Ipswich is balanced with the other advantages to its location.</p>	
--	--	---	--

APPENDIX 9 – IGS LANDOWNER / DEVELOPER SUMMARY OF COMMENTS

Source	Comment	IBC Response	Action Required (BLANK BOXES MEANS NO ACTION REQUIRED)
Indigo Planning on behalf of Crest Strategic Projects	Crest gives broad support for the draft SPD as is. 1. Henley Road better suited for trip generating activities, in comparison to Westerfield Rd which is rural in character. 2. Proposed new road bridge over rail line need to be able to accommodate all modes of traffic. 3. District Centre needs to be placed within close proximity of the railway crossing to ensure future development cohesion. 4. Locating facilities on Henley Rd would maximise the likelihood of facilities being accessed by foot or cycle from a larger proportion of residents of existing residential areas which are further from the town centre and have limited	1. and 3. District Centre located on Westerfield Road considered more appropriate location for other reasons including being more central to SPD area and accessible for communities north of Ipswich 2. SPD does not express intention for bridge to limit modes. 4. Locating closer to Henley Road would put the local centre beyond walkable 400m distance of some proposed residential areas in Henley Gate as shown on figure 7 (page 51). 5. Open space typologies are used to inform the framework which is noted as responding to environmental site features (para 3.4) as well as recognising that minor changes may be required as a consequence of ongoing detailed design and technical work (para 3.5). 6. Infrastructure Delivery Plan required by the SPD shall detail further how infrastructure will be delivered and funded between	2. Make clearer that bridge is intended to accommodate all modes of transport.

	<p>existing facilities. 5. Need for flexible application of open space typologies to respond to site characteristics and qualities. 6. Supports in principle the list of infrastructure investment, highlighted in tables 1-4, that is likely to be required to allow the implementation of the vision for the northern fringe. Supports vision that site will collectively deliver wide choice of housing/facilities. Considers the delivery of a new Country Park is a major contribution to the amenity and recreation opportunities for the people of north Ipswich and agrees it is best location. Crest maintains that viability is a key matter for the delivery of development on the northern part of the northern fringe and that a balance of profitable land uses must be achieved on land not used for the Country Park. Crest considers that a failure to allow profitable land uses to come forward on the northern site, alongside the Country Park, would represent an unequal distribution of developer costs and could act as a deterrent to development. Crest supports a robust strategy for multiple starts on site.</p>	<p>landowners / developers. The impact of this piece of work on the infrastructure tables is acknowledged. The question of viability and balance of profitable uses across SPD area is acknowledged and is intended to be addressed through the IDP which sets out the comprehensive delivery of required infrastructure by landowners.</p>	
<p>Mersea Homes</p>	<p>Wish to reiterate broad support for the vision and core objectives. Also wish to reiterate support for the principle of comprehensive planning, which they will seek to demonstrate that approach through the forthcoming planning application. 1. SPD errs towards policy creation in some places; e.g. para 3.17 misinterprets policy DM29 and para. 9.157 of the adopted Core Strategy. 2. (i) highlights need for flexibility; (ii) advocates achievement of good practice rather than exemplar approach. 3. Para 3.11 is contradictory of other statements on flexibility in “requiring” the given land-use budget to be delivered.</p> <p>4. Some elements of the spatial strategies fail to take account of the approach of individual planning applications rather than a single PA. Whilst happy for a part site planning application to adhere to the SuDS principles set out in the SPD questions the reasonableness of requiring a comprehensive SuDS strategy for the whole of the INF area which would involve unallocated land in third party</p>	<p>1. Not generally accepted. Although the specific example referring to the SPD’s interpretation of Policy DM29 does have some substance. Strictly speaking the 10% space requirement within net residential areas referred to in para 3.17 of the SPD cannot be regarded as <u>additional</u> to the Appendix 6 POS standards. The revised policy DM29 in the CSFR does not change this. May need to make a revision to the SPD text. 2. The SPD incorporates clear, robust guidance whilst recognising the need for an appropriate degree of flexibility in interpretation. (e.g. para. 2.9, 3.5, 4.1, 5.4). The exemplar approach is considered reasonable and necessary in achieving the standard of development considered appropriate for IGS and to be consistent with the vision and objectives. 3. Para. 3.11 does not require the given land-use budget to be delivered. It states that the table provided, summarises the ‘land uses’ required and sets out the broad quantities anticipated for each. Sufficient flexibility is considered to be provided in the use of the wording “broad quantities” in para. 3.11 itself and the fact that the land use budget areas indicated in the associated table are denoted as “Approximate area in hectares.” 4. It is important that individual planning applications can demonstrate compliance with the site wide spatial strategies expressed in the SPD to avoid a piecemeal approach. Mersea</p>	<p>1. Revise para 3.17 so that an additional 10% of land is not required but anticipated to be needed.</p> <p>7. Consider removing requirement for reserved sites for secondary school.</p> <p>8. Change wording in para. 4.22 (tenth bullet point) from ‘jointly liable’ to ‘expected’.</p> <p>15. Figure 49, page 155 – Amend Phase 1 to refer to</p>

	<p>ownership. 5. questions the requirement in para 5.31 of the SPD for design responses which adhere to stated design principles. 6. Para 5.38 requirement that protected trees “must be retained” in conflict with para 118 of NPPF. 7.provisions of para 3.43 of the SPD regarding “requirement” for secondary school reserved sites inconsistent with regulation 122 of CIL Regs 2010. 8. challenges statement that developers will be “jointly liable” to contribute to strategic facilities. 9. whilst developers will facilitate and contribute to the delivery of the country park it is the Borough’s responsibility to secure this given its Borough-wide function. SPD is inconsistent with CS Policy CS10. 10. Triggers in Infrastructure tables 1 -4 should be deleted – insufficient evidence and in conflict with CIL Regs. Acknowledges that trigger points are required but not for the SPD or the CSR to do this. 11. question household size assumptions made in para. 7.11 of the SPD. 12. Should rely on Council’s existing validation list and the SPD should not add to this. 13. Requirement for Community development Strategy and Neighbourhood Management Plans excessive and not in Council’s validation list. Mersea acknowledge that these are important issues that should not be put aside but should be addressed at “the appropriate stage of planning” and “that the evidence needed to support planning applications should be proportionate and justified”. 14. Design coding (or design control) should be dealt with through planning conditions at a later stage of the planning process. 15. Chart has transposed sites subject to Phase 12 and Phase 2 applications.</p>	<p>Homes state a commitment to adhering to the principles set out in the Sustainable Drainage section of the SPD (which is welcomed). A neighbourhood-wide strategy may be considered acceptable providing it can be demonstrated that it works and does not constitute an unacceptable piecemeal approach, and will not prejudice the potential to achieve an appropriate SuDS system for other parts of the SPD. 5. It is entirely reasonable for the SPD to require “adherence” to policy compliant design principles providing it is recognised (which it is) that different design responses to those principles are possible. Paras. 5.4 and 5.6 articulate IBC’s approach to designing the garden suburb which countenances different design approaches providing they adequately address the stated design principles. 6.</p> <p>Para 118 of the NPPF states that when determining planning applications, local planning authorities should amongst other things refuse planning permission for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss. Para 5.38 (page 102) of the SPD states that trees protected by Tree Preservation Orders must be retained. There has been comment that on that point the SPD contradicts the NPPF, however the particular paragraph mentioned is written in the context of block design principles and it is considered that at that level of detail blocks can be designed to accommodate those trees with TPOs without requiring removal and therefore text is appropriate. 7. Review reserve sites for secondary school text. 8. The principle behind this phrasing is correct in terms of Land owners being jointly responsible to ensure delivery and sustainability of whole development. But perhaps look at word choice as potential legal implications of words “jointly liable”. 9. Crest have not objected to the stated approach of developer led provision and the country park is on land within their control. 10. Triggers are considered appropriate to give a framework for ensuring necessary infrastructure to support the development is provided. Para 7.23 notes that the triggers are 'indicative' and the tables setting out the triggers caveat that they are as stated unless otherwise agreed with IBC through Infrastructure Delivery Plans. 11. The figure is based on census results and reflects the likely level of family housing assumed in IGS to give a figure which more robust for calculating infrastructure needs. 12. The exceptional scale of development warrants bespoke consideration of submission requirements and consideration of additional details not on validation list. Extra information required is supported elsewhere however, for</p>	<p>‘Fonnereau’ and Phase 2 to ‘Henley Gate’.</p>
--	---	---	--

		example NPPF encourages LPA's to consider using design codes at para. 59. 13. development of this scale and nature requires sound strategies on community development and management of community assets. 14. Do not necessarily agree - assurance on the quality of design needs to be provided at an early stage to support planning application proposals. 15. Error to be corrected.	
--	--	--	--

APPENDIX 10 – SA / SEA RESPONSES - SUMMARY OF COMMENTS

Part of scoping report	Comment	Hyder and IBC Response	Action Required (BLANK BOXES MEANS NO ACTION REQUIRED)
-------------------------------	----------------	-------------------------------	---

The following comments were received from Consultees

Natural England	SA should identify the need for the Country Park as an essential mitigation requirement to divert additional recreational pressure associated with development, away from European sites (as identified in the Ipswich Core Strategy Appropriate Assessment). SA should also specify that the Country Park will be designed and managed to ensure it will deliver this mitigation requirement as identified in the Appropriate Assessment.	Country Park is proposed in the SPD. There are positive contributions to the environment and biodiversity through the provision of the country park, public parks, open spaces, street trees and the retention of hedgerows (where possible) and trees. Further information regarding the Country park potential to divert recreation pressure from the SPA will be provided in the SA addendum.	Advice to be reflected in amendments to SPD
Suffolk Wildlife Trust	Section 34.9 of the SA sets out the baseline indicators for biodiversity, flora and fauna. It is noted that Suffolk Biological Records Centre (SBRC) are not included as a source of information for this element of the appraisal. We strongly recommend that data from SBRC is used as part of the SA.	The SA is a strategic level assessment and we consider that detailed information on habitats and species will be better addressed at the planning application stage. However, baseline indicators from the Records Centre have been used to guide the monitoring section of the Site Allocations SA. A recommendation will be made in the SA addendum to ensure that the Records Centre is contacted at the planning application stage.	Recommendation for SA addendum

The following comments were received from Residents

Residents	The proposed transport policy is unsustainable. Needs to be viewed in the Ipswich and surrounding neighbourhood effects. Bold initiatives are required.	Transport strategy and assessment to be undertaken at detailed planning stage. More detailed TA will be undertaken at Planning App stage and this formed basis of SA /SEA. Strategic sustainability in wider Ipswich is considered as part of Core Strategy.	
Residents	Do not believe that the plans for transport and accompanying pollution, waste (sewerage and household) and water facilities will be sustainable.	Transport strategy and assessment to be undertaken at detailed planning stage. More detailed TA will be undertaken at Planning App stage and this formed basis of SA /SEA. Strategic sustainability in wider Ipswich to be considered as part of Core Strategy.	

Residents	The garden suburb will not be sustainable, attempts to increase sustainable travel are unlikely to be successful due to minimal economic activity to support this and public transport being expensive and unreliable.	Transport strategy and assessment to be undertaken at detailed planning stage. More detailed TA will be undertaken at Planning App stage and this formed basis of SA /SEA. Strategic sustainability in wider Ipswich to be considered as part of Core Strategy.	
Residents	Transport strategy is unrealistic in its assumptions that people can and will use sustainable transport modes instead of cars.	Transport strategy and assessment to be undertaken at detailed planning stage. More detailed TA will be undertaken at Planning App stage and this formed basis of SA /SEA. Strategic sustainability in wider Ipswich to be considered as part of Core Strategy.	
Residents	development of site is only justifiable on sustainability grounds, given the loss of agricultural land, if all available brownfield sites are developed first or in parallel.	The Site Allocations and Policies DPD identifies other sites for development some of which are brownfield that will meet other housing needs.	
Residents	Sustainable transport is idealistic not realistic.	Transport strategy and assessment to be undertaken at detailed planning stage. More detailed TA will be undertaken at Planning App stage and this formed basis of SA /SEA. Strategic sustainability in wider Ipswich to be considered as part of Core Strategy.	
Residents	Inadequate consideration has been given to affordable houses and density.	<p>The new garden suburb will meet a full range of identified housing needs through varied housing which will include high quality social, affordable, and market homes.</p> <p>Precise details of mix will be negotiated on a phase by phase basis having regard to the latest available evidence on need. Currently in Ipswich, in broad terms, there is an identified need</p> <p>for family housing, accommodation for smaller households (including suitable accommodation for the elderly wishing to downsize), managed accommodation for the elderly, affordable</p> <p>housing for first time buyers, social housing for rent, and opportunities for self-build. Further analysis will be undertaken regarding up-to-date affordable housing needs and this will be reflected in the development.</p>	
Residents	Be realistic - plan for multiple cars for multiple occupancy.	Transport strategy and assessment to be undertaken at detailed planning stage. More detailed TA will be undertaken at Planning App stage and this formed basis of SA /SEA. Strategic sustainability in wider Ipswich to be considered as part of Core Strategy.	
Residents	This appears to be based on the development alone, in isolation, without due attention to the impact on the surrounding regions - particularly with regards to water, drainage, sewerage and traffic.	Drainage and transport assessments should be undertaken at the detailed planning stage which gives consideration of cumulative effects of surrounding development. SA/SEA is focussed on the sustainability of the SPD. The SA identifies the risks of increased traffic and identifies mitigation. a detailed transport assessment will be required at the planning application stage together with an	

		assessment of the effects on water supply which give consideration of cumulative effects. Drainage and sewerage are more localised issues but further consideration will be given at the planning application stage.	
Residents	Local residents concerns about traffic chaos have been largely ignored.	Transport strategy and assessment to be undertaken at detailed planning stage. More detailed TA will be undertaken at Planning App stage and this formed basis of SA /SEA. Strategic sustainability in wider Ipswich to be considered as part of Core Strategy.	
<p>The following comments were received from Northern Fringe Protection Group (NFPG) and Save Our Country Spaces (SOCS) (Additional SOCS comments are underlined)</p>			
General	The SA/SEA process requires an examination of the baseline information of the Borough as it is now together with data on how it may change in the future. The SA of this SPD must therefore be based on the best data available, which is not the case as it is based on the current Core Strategy which uses obsolete data, most notably East of England forecasts. It fails to take account of most recent data for example DCLG 2011 projections or EEFM 2013 forecasts. This SA is therefore unsound. Hyder needs to include this as a key recommendation as this could affect housing need and the phasing of the Northern Fringe development and will certainly impact on the travel patterns from the Northern Fringe to new places of employment.	Data used was most appropriate available at time of Scoping Report for SA undertaken. The outcomes are not considered to significantly alter as a result of the new data.	
Para 1.2.1 and 1.2.2	The SA specifically needs to consider the proposals contained in the concurrent Focussed Review of the CS. Paragraph 9.1.6 of the revised CS states that "Any planning application for the development of the area, which is submitted before the adoption of the Core Strategy Focused Review or the Supplementary Planning Document, will be required to have regard to the content of emerging policy and guidance in Policy CS10 and the Supplementary Planning Document respectively". We believe that the SA of the Northern Fringe SPD also needs to follow this guidance and specifically include an integrated assessment of the SPD within the context of the revised CS.	SA is of current SPD. A separate SA will be undertaken of the Core Strategy Focused Review. If changes are made to the SPD the need for an updated SA will be considered.	
Table 2-3	There are serious flaws and omissions in this summary of key sustainability issues and opportunities that need to be corrected for the SA to be sound, especially in relation to the use of	Data used was best available at the time and is not considered obsolete. Data used is based on outcomes of Scoping report which was consulted on and responses to consultation points are contained in SA (see Appendix C). See responses	

	obsolete data.	below to individual points.	
Table 2-3	Education and Qualifications This needs to better represent the low education standards in Ipswich by using the latest data in the Ipswich AMR (e.g. KS2 4.6% below national average and KS 12.5% below) and from the Ipswich factsheets from the Cities Outlook study which show that Ipswich has low education standards (55 out of 60 for GCSEs & 60/64 for high level qualifications). The performance of the education authority and its failure to help address these issues continues to be criticised by Ofsted. As currently drafted this provides a false impression and is clearly misleading. Why has Hyder chosen to underplay the poor educational standards and ignore both the AMR data and the views of Ofsted?	The table is a summary and already states that <i>"Educational attainment across Ipswich is below the national average"</i> .	
Table 2-3	Human Health This underplays the health issues in Ipswich and should use latest AMR data e.g. low levels of regular physical exercise (9.6% adults and 50% pupils years 1-13 compared to Colchester 14.6% and 74.5% respectively). More worrying is that 14.5% of people are registered with their GP as having depression compared to 4.5% nationally. New homes will only help the health of new residents. Can Hyder explain how new homes will improve the health of existing residents in their current homes in the Borough and make recommendations on how to do this for example recommending the regeneration of existing homes to achieve the Decent Homes standard.	The table is a summary and highlights a key measure of health - life expectancy. The SA is of the SPD which relates to the Northern Fringe area only, the SA would therefore not be expected to make recommendations for the whole of Ipswich.	
Table 2-3	Water This needs to consider waste water as well, for instance measures to reduce the odours of Cliff Quay sewage treatment works which affect nearby residents and make adjacent land unattractive to developers. Paragraph 6.92 of the NALP draft Strategic Plan, January 2014 recognises that the scale and cost of major new connections in relation to water supply and waste water infrastructure (including treatment plant), is currently inhibiting the progress of some strategic sites in Ipswich. The Ipswich Chapter of the Water Cycle Study (WCS) (by Royal Haskoning for Haven Gateway, 20092) concludes that: Existing sewage	The SA is a strategic assessment, drainage and sewerage plans would be assessed during the Environmental Impact Assessment (EIA) stage.	

	<p>treatment capacity for residential and commercial development reaches capacity in 2014/15; Significant infrastructure upgrade is required for wastewater over the entire timeframe ie 2009 onwards; and The draft Water Framework Directive classification for the area (Environment Agency, 2009) surrounding the Cliff Quay STW is "poor" (pg6-10). The current situation clearly needs to be clarified and examined as part of this SA. Any additional sewage infrastructure requirements to meet the proposed homes and jobs expansion must be identified and included in the Infrastructure table. Please explain why Hyder has ignored these concerns in its SA and how it plans to address them? We note, as of 12 February 2014, that there is still no foul water report for the Northern Fringe development, which could be a major barrier to its development and hence IBC's CS. This also needs to be raised as an issue.</p>		
Table 2-3	<p>Air Quality Hyder continues to refuses to acknowledge that air quality is worsening in Ipswich requiring new AQMAs and that residents will want and/or need to drive through the current and proposed AQMAs. Pedestrians and cyclists will not want to walk/cycle through AQMAs alongside queuing traffic as this will damage their health. Why does Hyder continue to ignore the worsening air quality in Ipswich whilst expecting residents to expose themselves to increasing pollution levels? In order to be sustainable air quality must be improving before encouraging more people to walk and cycle through the town centre. Why is Hyder not recommending that identified strategies must then be implemented? Ipswich's air quality needs to be assessed in the context of DIRECTIVE 2008/50/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 21 May 2008 on ambient air quality and cleaner air for Europe. In relation to NOx the limits are set out in Annex 2.A.2. Hyder needs to take these legally binding limits into account in its SA. The European Commission has launched legal proceedings against the Great Britain for failing to reduce "excessive" levels of nitrogen dioxide (NO2) air pollution from traffic.</p>	<p>The SA report has acknowledged that <i>"There are four Air Quality Management Areas (AQMA) within the Ipswich borough, all of which are designated for NO2 levels. All of the AQMAs are located within urban Ipswich and the closest is an area incorporating the Bramford Road/Yarmouth Road/Chevallier Street junction and part of Chevallier Street"</i>. The report also suggests that <i>"The air quality impacts of additional traffic within the locality and on the AQMAs must be assessed and strategies for limiting adverse impacts on air quality identified."</i> -Air quality modelling will be undertaken during the EIA stage and assessment submitted with any planning application. The SA recommends more sustainable transport options - cycling and walking- to reduce air quality impacts. It should be noted that the SA relates to the Northern Fringe area only and not the whole of the borough. See also Hyder's response to NFPG point on Air Quality in Scoping Report Appendix C of SA.</p>	

	<p>Why has Hyder failed to identify this breach of European law and failed to make recommendations that IBC's CS needs to ensure compliance with this Directive in order for its Transport Strategy to be sustainable? We note that the 2013 Progress Report is not yet available but should be ready within the next two months. The boundary review for the new AQMAs should also be available at the same time. It is imperative that the CS and SA take account of these reports in relation to compliance with this Directive. Hyder should be making this recommendation accordingly. If not it should explain its reasons for not doing so.</p>		
Table 2-3	<p>Transport Hyder continues to show a major lack of understanding of the transport issues facing Ipswich in this summary. Please explain why Hyder continues to claim that the Borough is well connected by transport infrastructure and public transport links and ignore the evidence base, for example: continued cross-party lobbying of Government for rail and road improvements to improve journey times into London etc together with reports such as NALEP draft Strategic Plan, Delivery Plan for the Suffolk Growth Strategy, Cities Outlook report and Ipswich AMR all expressing and noting traffic / transport capacity issues in Ipswich and strategic routes - why does Hyder ignore? direct bus routes from Northern Fringe to employment sites are required and should be recommended by Hyder.</p>	<p>Similar points raised and responded to as part of Scoping Report comments (see appendix C in SA). The transport issues are explored in more detail in the SA baseline (see appendix B section 34.13). The SA is looking at the SPD at a strategic level, at which it considered that the site is physically well connected by road and rail. More detailed assessment of the current capacity, impact and mitigation of transport routes will need to be undertaken and assessed at planning application stage. In terms of the sustainability of the SPD with regards to Transport, the SA states (page 249) that: <i>"The spatial strategy does promote the use of sustainable modes of transport, including improving walking/cycling routes within the Garden Suburb and surrounding areas and ensuring residential development is well serviced by public transport, including buses"</i>.</p>	
Table 2-3	<p>Economy This summary uses out of date information and needs to include specific data, for example 16% people in Ipswich are on benefits compared to 11.6% in Suffolk. Average pay is 6.4% lower than Suffolk and 15% lower than East of England and has recently decreased whilst it has increased in Babergh, Mid Suffolk and Suffolk Coast (Ipswich SHMA). Why does Hyder not use the most recent Ipswich AMR data? Also key issue with attracting high quality, well-paid jobs to Ipswich and getting long term unemployed back to work - why have issues and opportunities been ignored by Hyder? Why has need and opportunity for Ipswich to improve office development been ignored by Hyder? transport barriers to economic</p>	<p>Data used was best available at time and uses measure accepted at scoping stage. The SA states (page 167) that: Ipswich remains the most deprived Local Authority in Suffolk being ranked 87/326 in England, which covers issues such as low income. The SA relates to the Northern Fringe area and not for the whole borough, which may have more opportunities to provide office employment.</p>	

	growth need to be identified by Hyder.		
Table 2-3	<p>Deprivation and Living Environment</p> <p>There are nine wards LSOAs in the bottom 20% most deprived nationally as Sprites has been omitted and this needs to be corrected. The number of areas in Ipswich within the most deprived 20% of areas nationally has increased from 19 areas as recorded in the IMD 2007 to 21 areas in 2010. In absolute terms, the number of people living within the most deprived 20% of areas has risen by 2.5% suggesting that Ipswich has become comparatively more deprived since 2007. The UK Peace Index5 reports that "Ipswich is the least peaceful local authority in the East" Institute for Economics and Peace, April 2013. Peace is strongly linked to deprivation in income, employment opportunities, health and disability, education and in access to housing and services. This report needs to be added to the evidence database. Specific solutions are required to tackle deprivation in the most deprived wards. Why does Hyder not provide a recommendation to do so? Please explain how new homes in other parts of Ipswich will tackle crime rates in existing wards?</p>	Table 2-3 recognises that 'a number' of wards within Ipswich are considered to be in bottom 20% most deprived nationally. No specific number is quoted so not clear where incorrection is. Satisfied that deprivation indices provide most appropriate overview for purposes of SA, and last one available is 2010 so most up to date data has been used. It is not clear what data sits behind analysis used in the Peace Index. The Index of Multiple Deprivation remains a more credible and reliable source of evidence and is sufficient to provide evidence for identifying key sustainability issue for SA. The SA relates to the Northern Fringe area SPD and does not cover other parts of the borough, and therefore would not make recommendations on other parts of Ipswich in terms of tackling crime rates.	
Table 2-3	<p>Housing The Ipswich AMR and Council's 2005 Private Sector Stock Condition Survey shows an increase in the numbers of empty homes in Ipswich and that 36.9% private sector homes in Ipswich do not meet the decent homes standard. Why has Hyder chosen to ignore these key issues and not made recommendations that the Council should work to improve this situation?</p>	The SA relates to the Northern Fringe area SPD and does not cover other parts of the borough. Wider issues are covered in the Core Strategy SA and Site Allocation SA.	
Table 2-5	Number of suggestions to improve the objectives and indicators which should be incorporated and the SPD reappraised accordingly.	Please see responses below. It should be noted that these indicators were consulted on during the scoping stage and updated during the preparation of the SA Report.	
Table 2-5	ET1. This should include an indicator to measure congestion as this is the main cause of air pollution. Air quality should be assessed in respect of compliance with EC legislation.	Air Quality assessments will be submitted as part of EIA to accompany planning applications and will be considered against national / local policy which advises on EU legislation. The following indicators are provided, which are measurable: "ET1a. <i>Number and distribution of AQMAs</i> ET2b. <i>Annual average NO2 levels in the Borough</i> ET2c. <i>Number of exceedences of Air Quality limit values at automatic monitoring sites</i> ". IBC to	

		consider whether an air quality monitoring station should be located near the northern fringe area.	
Table 2-5	ET2. The key issue is whether new developments will detrimentally impact on the conservation of soil resources and quality. Why has Hyder omitted this? We strongly object to these indicators as it is not acceptable to omit any indicator that relates to conserving existing soil resources and quality for example a better indicator would be in relation to the quality and area of green space. There should also be an indicator that measures the percentage of PDL used as well as that being available.	The SA includes the following guide question: " <i>To what extent would new development help to maintain and enhance soil quality where possible?</i> " An indicator on PDL is provided: " <i>ET2a. Area of contaminated land returned to beneficial use</i> ". One of the guide questions under the biodiversity section refers to green spaces: " <i>To what extent would new development provide opportunities for people to access wildlife and open green spaces?</i> " There is an indicator relating to wildlife habitats: <i>ET8c. Area of new wildlife sites / habitats created within the Northern Fringe area.</i>	
Table 2-5	ET4. This should question whether the location of new homes is near to the location of new jobs as this is the key determinant regarding pollution from the daily commute. An indicator measuring congestion needs to be included here if not included in ET1.	Whilst the location of new houses to jobs could be an indicator in promoting sustainable modes it does not necessarily result in direct impact on car use and pollution levels. The following indicators are provided: " <i>ET4a. Traffic volumes, access to local services and journeys taken by sustainable modes</i> " <i>ET4b. Journey to work by mode</i> " and these would provide actual levels of journey modes and better test the performance of the plan in terms reducing the impacts of traffic. The impacts of congestion are considered to already be covered through other indicators such as air quality, waiting times at junctions etc and uses data already collected and measurable. IBC to consider whether an air quality monitoring station should be located near the northern fringe area.	
Table 2-5	ET6. ET6a should specifically identify homes and transport emissions as this would be helpful in assessing other objectives.	Noted but difficulties in accurately measuring emissions specifically from transport and houses resulting from Northern Fringe development. The indicator " <i>ET4b. Journey to work by mode</i> " would provide an indication of potential transport emissions. Indicators ET6a " <i>Level of energy efficiency in homes, energy consumption and number of applications for renewable energy developments</i> " and ET6c " <i>Annual average domestic gas and electricity consumption per consumer</i> " would provide an indication of house emissions.	
Table 2-5	ET7. Clearly an indicator recording the instances of flooding in Ipswich is required to measure this objective.	Noted. However, an indicator relating to developments and flooding is provided: <i>ET7a. Developments on land at risk of flooding</i>	
Table 2-5	ET8. ET8a needs to measure farmland as well as this provides biodiversity and is a valuable and diminishing asset.	Core Strategy already considered the loss of Agricultural land in sustainability terms. The impacts of proposed development on existing biodiversity will be explored in greater detail through EIA to be submitted with planning applications - this includes detailed assessments of biodiversity before and after proposed development and mitigation required. The point is noted - the biodiversity value of farmland in the Northern Fringe would need to be considered before this proposed indicator is provided. The other indicators relates to areas of high biodiversity value created as a result of the	

		proposals.	
Table 2-5	HW1. Those most in need are existing residents suffering from unhealthy conditions and lifestyles. A better indicator than HW1b would be the levels of physical activity. The current indicator only covers people in work and thereby excludes the most vulnerable sections of society such as the ill, retired, children, unemployed etc. A measure of the level of a child's physical activity is far better than how they travel to school. As Ipswich has major depression issues, we suggest that an indicator measuring the number of people registered with their GP as having depression is a good indicator. An indicator of the level of substandard homes in Ipswich would also be a good indicator and should be considered for inclusion.	Noted and consideration could be given to levels of physical activity through <i>access to sport facilities</i> indicator being included. Information on the number of people registered with their GP as having depression may be confidential information and not publicly available. The SA is for the SPD area only and it is not intended to include sub-standard homes.	
Table 2-5	ER1. This needs to ask whether developments will improve existing areas of deprivation. There should be an indicator for the number of people on benefits as this has a strong link with poverty and deprivation.	The existing indicator " <i>ER1a. Proportion of population who live in wards that rank within the 10% most deprived in the country</i> " provides an indication of deprivation within the borough. It should be noted that the SA is for the northern fringe area and not for the whole borough. It is assessing the proposals for the SPD area only.	
Table 2-5	ER2. This needs to have an additional indicator for the numbers of long term employed and to measure the average wage.	Average wage is covered in the key issues and opportunities	
Table 2-5	ER3. This needs to consider whether development will improve the existing housing stock as this is by far the largest issue. A good indicator would then be the number of privately rented homes falling below a specific EPC rating, e.g. "E", as this is the sector containing the worst condition housing stock often lived in by the poorest members of society. A better indicator than ER3b would be to compare percentage split of dwelling types to actual requirements. A better indicator than ER3c would be to measure affordability.	The SA relates to the Northern Fringe area SPD and does not cover other parts of the borough. The northern fringe development would provide housing within the area but is not expected to meet all the requirements for the borough. Sites for housing development have been identified in the Site Allocations and Policies DPD. Indicator ER3d is an indicator of relative housing affordability.	
Table 2-5	ER4. An indicator is obviously required to measure the net number of new jobs created in the Borough. Why has this been excluded?	The SA includes the following indicators: " <i>ER4a. Planning consents for employment uses</i> " and " <i>ER4b Take up of employment floorspace</i> ". The SA relates to the Northern Fringe area and not for the whole borough.	

Table 2-5	ER5. An indicator is required to measure the net number of new jobs created specifically in the town centre. ER5a will become meaningless as existing units are permitted to change use.	The SA relates to the Northern Fringe area and not for the whole borough, however it is recognised that Northern Fringe development may have positive impact on the town centre and it may be possible to assess impacts on local / district centres elsewhere. This would need to come through at a higher strategic level and potentially through the SA of Core Strategy FR.	
Table 2-5	ER6. This needs to have an objective and indicator for the number of net new jobs created in the Borough to be balanced with the number of new homes as this is the key thrust of the revised CS. There should be an indicator recording the net commuting figures for the Borough.	This would be matter for SA of Core Strategy to consider. The SA relates to the northern fringe area and not for the whole borough.	
Table 2-5	ER7. The indicator recording the number of net new jobs created in the Borough could be included here. ER7b. Should measure the conversion rate of enquiries – having 100 enquiries might seem good but if none of them result in new businesses then it is awful.	Noted that this measure does not relate into new businesses but it is data currently collected and does provide good indication of business/commercial investment interest in the area. Net new jobs indicator suggestion can be considered in any SA updates.	
SA objective compatibility	should be reassessed following any changes.	See above comments, no reassessment required.	
Para 2.3.18	The SA underestimates the impact of Objective ER3, which is incompatible with: ET1; ET2; ET3; ET4; ET6; ET7; and ET8. Eg ET1 - AQMAs adversely affected by development and further reduces desirability of sustainable travel modes. <u>ET1 needs assessing in relation to ET4, ET8 and HW1 as Transport Issues-Air Quality and impacts on Human Health, have known potential to trigger chronic long term illness and increased mortality rates. Development is and will have adverse impacts on AQMAs and other areas where traffic will increase as a result of commuting. This needs to be recognised as IBC may bear costs in future through infringement fines.</u>	The conclusion on whether objectives are incompatible or not is the professional view of Hyder. Council satisfied that the impact of ER3 has been correctly identified as having some uncertainties with regards to compatibility to other objectives as these could be addressed through SPD. For example mitigation measures (sustainable transport modes) have been recommended to reduce air quality impacts. ET1 has been assessed in relation to ET4, ET8 and HW1 (see table 2-6).	
General	The SA contains no references to DEFRA Air Pollution in the UK Report (September 2012); key recommendations made by the UK Committee on the Medical Effects of Air Pollutants (COMEAP); and has failed to acknowledge nor has data and guidance from the DEFRA LAQM site. For ET6, Climate Change - Pollution Climate Mapping for pcms should be referenced. These are especially important and necessary given Ipswich has a nationally recognised long standing air quality	The SA has identified potential negative effects on air quality as a result of the development but also identified sustainable travel measures that may help to mitigate this. It is encouraged that more detailed assessment of traffic is undertaken at the planning application stage prior to approval which would require a detailed assessment of air quality impacts in line with government guidance. These assessments will be underpinned by the statutory requirements with regard to human health. It is recommended that Human Health Impact Assessment is undertaken alongside any potential EIA.	

	<p>issue.</p> <p>The likely significant increase in traffic and therefore pollution, should require developers to pay / mitigate existing population. On that basis estimates need to be done to estimate likely health service costs triggered by pollution related illness, together with assessments of likely increase in mortality risks. Councils and Hyder can use information such as local particulate air pollution levels to calculate the number of deaths in their area which are due to poor air quality- http://www.airqualitynews.com/2013/04/25/defra-publishes-annual-uk-air-quality-statistics/</p> <p>Traffic impacts from adjacent authorities also needs to be assessed and factored in as compounding effects. In addition, page 68 of the Defra 2012 report shows impacts from Europe which are significant to Ipswich Area.</p>		
Para 2.4.5	<p>The focussed review of the CS proposes changes to these. This appraisal is out of date and needs to be revised accordingly. The proposed change to policy CS9 removes the Previously Developed Land target. The SA needs to properly assess the impact of allowing multiple starts and removing priority of building on regeneration sites over green field sites. see <u>http://www.parliament.uk/documents/commons-vote-office/March_2014/6th-March/1.%20DCLG%20Local%20Planning%20.pdf</u></p>	The CS Focused Review assessed changes to CS9. This SA assesses the proposals for the Northern Fringe area SPD only.	
Table 4-7	<p>This needs to take account of the location of the Northern Fringe relative to the proposed new sites of employment, which are located away from the Northern Fringe. Please refer to our comments on the revised CS, the NALEP strategic economic plan, the Suffolk Growth Strategy and the 2013 EEFM modelling data. Ipswich town centre is not identified as a major employment growth centre and more Ipswich Borough residents are already having to commute out of the Borough to find work. The effects of this are clearly negative in relation to ET1, ET4 and ER6. Carbon emissions from commuting will also detrimentally impact on ET6. The assessment needs to be re-scored accordingly. Connectivity for ER2 and ER4 should also be scored as a negative. Hyder</p>	The point is noted but the table is intended to show the compatibility of the SA Objectives against the Vision Key Themes and Core Objectives of the SPD, not what the impacts of the development may be. This SA assesses the proposals for the Northern Fringe area. Mitigation measures (sustainable transport options) are recommended in the SA. Also, the SPD itself includes sustainable transport options. On that basis do not agree that Vision and Objectives of the SPD are incompatible with the referenced objectives.	

	needs to take better account of the traffic issues that are well known to all Ipswich residents and the fact that the major new sites of employment are not located near the Northern Fringe.		
Para 4.2.5	This needs to be corrected to recognise that “the Northern Fringe area is not well connected to jobs by foot, bike or public transport”.	This paragraph refers to the SPD Vision, which seeks to provide connections by foot, bike or transport from the Northern Fringe area to other parts of the borough.	
Para 4.3.4	There are big differences between people commuting from the Northern Fringe into the town centre compared to commuting out of Ipswich Borough to other Boroughs which have not been taken into account. The SA needs to consider and reflect this better.	Noted, but the SA and the objectives are just for Northern Fringe area. Therefore distinction not necessary here, as the point being made is that as a result of employment being outside Northern Fringe the contribution to economic objectives set out for the Northern Fringe is limited.	
Section 4.3	The appraisal needs to acknowledge that there are negative effects in relation to ET1, ER4 and ER6 in relation to transport/commuting. <u>Impacts on rural roads - NPPF " no serious effects" no assessment or modelling.</u>	This section of the SA is assessing the Framework Plan contained in the SPD against the SA objectives. Having reviewed the guide questions for each of the objectives the conclusions are logical with regards to assessing the Framework Plan in the SPD. The SA states that <i>"It is expected that there will be an increase in car use, which has potential to affect local air quality. It should be noted that the Northern Fringe is not adjacent to any Air Quality Management Areas. The framework plan seeks to reduce these potential effects by promoting sustainable transport – the use of the rail connection from Westerfield, introduction of bus services and provision of cycle and walking routes"</i> .	
Para 4.3.7	This needs to recognise that whilst the Northern Fringe is not adjacent to any Air Quality Management Areas, residents will need to commute through AQMAs to get across town and access the A14/A12 and other new sites of major employment. Air quality assessments recommended by Hyder need to extend to potential commuting routes from the Northern Fringe and not just be limited to adjacent roads.	Air quality assessments/modelling would be undertaken during the EIA stage.	
Section 4.6	This needs to take better account of the off-site issues of the Northern Fringe development as we have identified above and in our response to the CS review.	The para 4.6.3 of the SA states that: <i>"The development of 4,500 new homes within the Northern Fringe may have the potential to increase flood risk and the associated influx of private cars may affect greenhouse gas levels and quality of life. However, the provision of convenient and frequent bus travel within the Garden Suburb will offer some mitigating effects in offering residents an alternative convenient and more sustainable travel option"</i> . The wider Borough issues will explored through the Core Strategy SA.	
Section 4.6 and Para 4.7.4	Assumes that the replacement of Valley Rd roundabouts with Tuddenham Rd and Westerfield Rd with traffic lights with UTMIC links are	This based on advice from Highway Authority (Suffolk County Council). SPD does require further detailed Transport Assessments to look in to necessary mitigation and off-site highway	

	best solution without evidence. Currently the UTMC scheme in place does not appear effective. The SA needs to ensure the best design of these junction to help sustainable travel and must recommend that these roundabouts are not replaced without business case justification. <u>AQMA - impacts from this policy, more stationary traffic.</u>	improvement works.	
Section 4.7	Noted that SPD proposes to control the risks of multiple starts in chapter 7. These requirements should also be included in the Core Strategy, as the SPD cannot set policy. Not including in the CS is a risk which should be identified and recommended on in the SA.	Noted. To be considered for inclusion in the Core Strategy by the Council.	For consideration in Core Strategy Focused Review.
Section 4.7	The development sequencing of the Northern Fringe must be reviewed once the housing needs and target figures have been reassessed using recent data. The SA needs to include this as a recommendation.	This can be included as part of the emerging SA addendum.	
Section 4.7	it is also advocated that restrictions are placed on the number of sites operated by any one developer at any one time. It is suggested that one main operational site per developer at any one time although these could be staggered as one site nears the end of development. This is considered to be a more sustainable approach to the development by better managing the issues associated with multi-site development. The SA should recommend this accordingly.	It is not up to the SA to make recommendations about the number of developers. It is important that the site is developed in a coordinated manner that ensures the provision of necessary services and infrastructure.	
Section 4.7	The Northern Fringe land allocations should clearly show the allocation for SuDs since this forms a key aspect of the design and will impact on both housing densities and the amount of housing. To ensure sustainability all revisions to the proposed SuDs scheme made by the Environment Agency and the IBC Drainage Engineer must be incorporated into the design and the SA should recommend this accordingly. <u>SA does not reference the 2013 IBC SUDS document. Also new Guidance needs to be taken into account.</u> http://www.parliament.uk/documents/commons-vote-office/March_2014/6th-March/1.%20DCLG%20Local%20Planning%20.pdf	The SA is a strategic assessment. A Drainage Strategy would be prepared during the planning application stage, which would have details on SUDs and take account of the latest guidance available. The emerging SA addendum will recommend that a Sustainable Drainage Strategy is at the heart of any future masterplan.	
Section 4.7	Re: Table 1 in ch 7 of draft SPD - in general support inclusion of table but concerns with it not picked up in SA which relate to:- We note that the	This issue relates to the CS and the SA of the CS. This SA states that <i>"Over the long term, the delivery of the Ipswich Garden Suburb will see the provision of a new country park and tree planting, which will</i>	

	provision of the country park is included in this table but omitted from Table 8b) in the revised CS. We assume this is an oversight, which needs to be corrected. If this is not included in the CS document then the Appropriate Assessment will have to be revised. This SA needs to identify this issue and recommend that it is corrected.	<i>provide biodiversity benefits</i> ". Country Park is included in table 8a of the Core Strategy Focused Review as a major infrastructure proposal.	
Section 4.7	Re: Table 1 in ch 7 of draft SPD - in general support inclusion of table but concerns with it not picked up in SA which relate to:- Traffic management scheme for Westerfield village, The Crofts and other locations. This needs to specifically reference Whitton and the Dales as well.	Noted but given SA is a strategic assessment such details to be considered in SPD revisions.	
Section 4.7	Re: Table 1 in ch 7 of draft SPD - in general support inclusion of table but concerns with it not picked up in SA which relate to:- Enhancements to school playing fields and other outdoor recreation facilities for community use. This requirement should include the agreement of an acceptable access plan to enable the community to use facilities during both school and non-school hours. This is especially important given the potential to be free schools/academies.	SA states in Appendix F- Table 5 - " <i>The delivery of the Garden Suburb will lead to permanent changes to view and character, however, the infrastructure requirements of the Garden Suburb and the villages of Fonnereau, Henley Gate and Red House include the delivery of a new country park, strategic playing fields, outdoor recreation facilities, neighbourhood parks and allotments</i> ". Access Plan to be considered by the Council at planning application stage.	
Section 4.7	Re: Table 1 in ch 7 of draft SPD - in general support inclusion of table but concerns with it not picked up in SA which relate to:- Travel Plan development, implementation & monitoring. There should be a requirement for Travel Plans to include the commute from the Northern Fringe development to the sites of new jobs in the Ipswich Policy Area as this will be the major travel pattern of residents at peak times.	Mitigation measures (page 53) include: " <i>The development of Travel Plans and 'smarter choices' programmes is encouraged and can reduce reliance on the private car, encourage walking, public transport, cycling and car sharing and can reduce demand for travel</i> ". The exact nature and content of the Travel Plans will need to be informed by the more detailed Transport Assessments to be submitted with planning applications.	
Section 4.7	Re: Table 1 in ch 7 of draft SPD - in general support inclusion of table but concerns with it not picked up in SA which relate to:- Vehicular rail crossing and Fonnereau Way cycle / pedestrian bridge across rail line. There is a risk that development of Henley Gate reaches 299 homes then stops for several years, whilst other developments continue unabated resulting in unconnected developments. This needs to be guarded against especially in relation to access to the high school and district centre from Henley Gate.	Noted, but SPD correctly identifies the infrastructure requirements and point at which required. It will be role of planning application to secure delivery.	

Section 4.7	Re: Table 1 in ch 7 of draft SPD - in general support inclusion of table but concerns with it not picked up in SA which relate to:- 2FE (form of entry) primary school & nursery. There is a risk that development stops at 399 homes on the Southern development or 199 homes on either of the Northern or Eastern developments for several years without the provision of a primary school. How would this be addressed, as existing primary schools would not be able to accommodate the increase in schoolchildren? In order to manage this risk, we believe that there should also be a fallback requirement for a primary school on the Northern Fringe, once a minimum number of houses across all three neighbourhoods has been reached.	Phasing of school provision and ensuring delivery to be considered during the planning application stage and for SPD to address concern.	Review trigger in SPD to address concern.
Section 4.7	Re: Table 1 in ch 7 of draft SPD - in general support inclusion of table but concerns with it not picked up in SA which relate to:- As above there is a similar risk for the 1,200 space secondary school (including sixth form facility) with development stopping at 499 homes for several years. How this would be addressed as school places are required for the Northern Fringe development and as a result of the additional two form entries at St Margarets and Rushmere primary schools?	Phasing of school provision and ensuring delivery to be considered during the planning application stage and for SPD to address concern.	Review trigger in SPD to address concern.
Section 4.7	Re: Table 1 in ch 7 of draft SPD - in general support inclusion of table but concerns with it not picked up in SA which relate to:- There is a similar but even larger risk in relation to any required strategic improvements to sewerage system. Reference: http://www.parliament.uk/documents/commons-vote-office/March_2014/6th-March/1.%20DCLG%20Local%20Planning%20.pdf . We are concerned that major infrastructure works will be required to allow sewage treatment from the Northern Fringe development at Cliff Quay STW and the worrying lack of information from Anglian Water on this issue. Anglian Water's preferred option for dealing with capacity issues should be included here so that necessary investment, scale of works/disruption can be identified and implications for timing and delivery of the NF development fully considered.	Drainage / sewerage have been correctly identified as infrastructure requirement along with Drainage and Sewerage Plans to be prepared at the planning application stage.	

Section 4.7	<p>Re: Table 1 in ch 7 of draft SPD - in general support inclusion of table but concerns with it not picked up in SA which relate to:- By risking uncontrolled multiple starts across the Northern Fringe, theoretically 499 homes could be built without any new schools, local centre infrastructure framework, vehicular and Fonnereau Way pedestrian rail crossings or a country park. Whilst we know that this is not IBC's intention, this major loophole needs to be guarded against and closed through amendments to the CS. If major sewage infrastructure works is required after say 499 homes this is a very real risk that has been overlooked. The SA needs to make appropriate recommendations to resolve these issues.</p>	<p>Phasing of school provision and ensuring delivery to be considered during the planning application stage and for SPD to address concern.</p>	
Section 4.8.1	<p>It is incorrect to limit the increase in road traffic to "major roads" as there will be increased traffic on all through-roads around the Northern Fringe as drivers seek to avoid the inevitable congestion that will arise from the development. This needs to be recognised in this paragraph accordingly.</p>	<p>It should be noted that recommendations have been made to promote sustainable travel options. A transport assessment during the planning application stage will identify which roads are likely to be congested and specific mitigation / management measures.</p>	
Para 4.9.1	<p>As there are insufficient jobs being created near to the Northern Fringe, it is inevitable that the residential development within the Ipswich Garden Suburb will result in new residents commuting both across and outside the Borough to seek employment. This will increase traffic, not just on main roads, but on rat-runs to the sites of new employment. This SA needs to take better account of this issue.</p>	<p>This issue is acknowledged in the SA paragraph 4.9.1.: <i>"... since there will be limited employment opportunities within the Northern Fringe, new residents may seek employment in neighbouring boroughs, which would increase traffic on major roads to surrounding areas"</i>. The sustainability implications of this would be explored through the Core Strategy. SPD identifies how this will need to be assessed and mitigated through more detailed transport assessments to be submitted with planning applications.</p>	
Recommendations	<p>Additional recommendations:- Page 4 Forward We are disappointed that the Forward of the SPD is extremely misleading as it states that "The Council's Core Strategy, adopted in 2011, allocates land between Henley Road and Westerfield Road and south of the railway for up to 1,000 dwellings prior to 2021". Whilst it is true, this is neither the Council's intention nor what the Council is proposing in the focused review of the Core Strategy. As Council has stated is a material consideration when considering the Ipswich Garden Suburb (IGS) SPD this should have been accurately stated upfront. Hyder should recommend that IBC be upfront and clear about its intentions with regard to multiple starts.</p>	<p>This is not a point we would expect the SA to address. This is more an objection for SPD content. The Foreword reflects what is currently in place in terms of policy and that review is being undertaken.</p>	

<p>Recommendations</p>	<p>Additional recommendations:- Page 20 We object to the deletion of the following statement from IBC's Vision Statement & Core Objectives "... the retention of existing on site vegetation- the retention of existing trees and hedgerows in the interest of biodiversity and in order to maintain and improve the canopy cover, which is a defining characteristic of the adjacent St Margaret's Ward.". This goes against both sustainability principles and the garden suburb concept. Hyder must recommend that this be reinserted otherwise the public will have little faith in IBC's green vision.</p>	<p>This is more an objection to SPD and not for SA to address. SPD still expresses the importance of retaining and using existing trees and hedgerows through the Vision and Core Objectives (see paras 2.16, 2.65). Pages 35 and 36 of the SPD states identifies that: The Framework Plan indicates the broad organisation of open spaces and corridors across the site. It is informed by the site's topography and existing watercourses and by existing hedgerows...Many trees are covered by the TPOs. A detailed arboricultural survey should be carried out to confirm the quality of the trees and hedgerows as part of the detailed masterplanning of the site. The alignment of existing waterways and topography (e.g. areas at risk of flooding) also informs the distribution of open spaces.</p>	
<p>Recommendations</p>	<p>Additional recommendations:- The NF SPD omits any information on hydrology or topography. This is a major oversight that needs to be addressed before the SPD can be agreed. The SA needs to identify this issue and make the necessary recommendation to address it.</p>	<p>Pages 35 and 36 of the SPD states-identifies that: The Framework Plan indicates the broad organisation of open spaces and corridors across the site. It is informed by the site's topography and existing watercourses and by existing hedgerows...Many trees are covered by the TPOs. A detailed arboricultural survey should be carried out to confirm the quality of the trees and hedgerows as part of the detailed masterplanning of the site. The alignment of existing waterways and topography (e.g. areas at risk of flooding) also informs the distribution of open spaces.</p>	
<p>Recommendations</p>	<p>Additional recommendations:- We note that there are imaginative details of potential Car parking and Garage layouts on pages 112 to 115. However the House Type D (page 110) shows a dwelling at the top of the page where car parking occupies most of the rear garden space. This detail clearly infringes item I. 5.45 (page 106) "Dimensions for Gardens do not include rear Parking spaces". We would like to see Hyder recommending that this detail is removed and that Hyder reinforces the need to comply with this policy. The Parking details generally show minimal parking spaces e.g. a 3 Bedroom / 5 Person House with 2 spaces or 1 garage plus 1 space. For modern families where young adults stay longer in the family homes this is likely to prove inadequate, especially as many residents will need to use their cars to commute to places of employment away from the Northern Fringe would consider this to be inadequate and would result in undesirable alternative parking on grass verges etc. We would like to see a recommendation for a minimum car parking space per dwelling specification and a minimum</p>	<p>The SA is strategic assessment of the SPD and would not comment on this level of detail. The suitability and adequacy of parking standards will be considered in further detail at planning application stage and considered against latest parking standards published by Suffolk County Council at the time.</p>	

	width for garages to fit today's relatively larger vehicles. This will result in a more sustainable car parking solution.		
Recommendations	Additional recommendations:- We note that page 106 specifies a minimum depth for back gardens to be nine metres. We believe that this is insufficient to provide the high quality garden suburb development that is intended. We would like to see a recommendation for a figure in the region of 12 metres for a three bedroom dwelling and/or an equivalent square area for those wider gardens.	The SA is strategic assessment of the SPD and would not comment on this level of detail. The suitability and adequacy of garden space is a matter for consideration in the SPD and planning application.	
Recommendations	Additional recommendations:- Section 3.16 of the SPD recognises a provision of 12ha is required to comply with the Core Strategy Appendix 6 but that the formal open space, which includes sports pitches, amounts to 5.5ha i.e. a deficit of at least 6.5ha. Appendix 6 of the Core Strategy specifies 1.53ha outdoor sports space provision per 1000 people. There is already an under provision in Ipswich particularly in the North and Central Areas. Also we note that the population of Ipswich was shown in the 2011 Census to be much higher than expected and the latest EEFM 2013 Ipswich population forecasts are significantly higher than the EEFM 2012 data used in the CS focussed review. Hyder should be recommending that the 12ha requirement be reassessed in the light of such evidence as we suspect it to be an underestimate of that needed to meet IBC's required standards for the Central/North areas. The Northern Fringe is the last major area of greenspace within the Borough that could be used to address the deficit in publicly available outdoor sports provision and IBC should give this appropriate consideration rather than make the situation worse.	The SA is a strategic assessment of the SPD. This is a policy point for Core Strategy to consider.	
Recommendations	Additional recommendations:- The SPD refers to 'additional provision should be made at the secondary and primary schools where all-weather pitches and shared community use is sought'. This may not be so easy to achieve since free schools/academies are free to make their own decisions and that schools normally require	SA is a strategic assessment. This is comment for SPD and detail to be agreed through planning applications	

	access to such facilities both in and outside of schools hours. Any such shared facilities should include the agreement of an acceptable access plan agreed with the local community to enable community use of facilities during both school and non-school hours. Hyder should be recommending that any sports provision on shared sites that is not regularly accessible to the general public during school time needs to be topped up by additional facilities on a pro-rata basis.		
Recommendations	Additional recommendations:- Hyder should also be recommending that an additional requirement be included in the SPD for all sports pitches to be provided on well-drained flat land otherwise they will not be fit for purpose.	The SA is strategic assessment of the SPD and would not be expected to comment on this level of detail. The position and drainage implications of the sports pitches will be determined at planning application stage.	
Recommendations	Additional recommendations:- Page 152 Chapter 9 Long term management and maintenance of the SPD requires clarification. It is not clear what the proposed annual service charge levied upon residents and businesses is intended to cover. To expect residents to pay an additional maintenance charge for assets such as Country Park whilst paying council tax that covers maintenance charge for these types of assets used by other residents and not themselves is unfair and clearly discriminatory. Placing an additional charge on businesses in addition to business rates will deter businesses from the Northern Fringe, which will undermine and damage the proposed local and district centres. However, we accept that a surcharge to cover the maintenance of additional assets not typically enjoyed by other residents elsewhere in Ipswich may be appropriate for domestic residents. We would like to see Hyder include recommendations to this effect.	The SA is strategic assessment of the SPD and would not be expected to comment on this level of detail. Further feasibility work is required in terms of the details of potential management / maintenance approaches and the ways by which they are funded. This is noted in the SPD, in chapter 9.	
Table 6-1	As a general comment, this is confused as it shifts between Northern Fringe specific indicators and Ipswich Borough indicators, which results in inappropriate significant effects and indicators being identified. A full review of this table is required.	To clarify all indicators refer to the Northern Fringe area.	
Table 6-1	ET1 This should not be limited to the Northern Fringe area but should relate to traffic arising from the Northern Fringe.	Noted but the SA is intended to look at sustainability objectives of and for the Ipswich Garden Suburb area. The wider air quality impact of the SPD area on Ipswich should be identified through the Core Strategy SA.	

Table 6-1	ET4 and ER6 We would like to see some monitoring and assessment of the level of rat-running. Monitoring of train stations should be limited to Westerfield train station. Please can Hyder clarify which underground stations it recommends monitoring?	Reference to underground station should be removed. There would be difficulties in monitoring 'rat-running'. Use of rail travel may not be limited to Westerfield Rail station.	
Table 6-1	ET5 We suggest that this is better-related to the Northern Fringe.	Second from last indicator should be: Percentage of completed retail, office and leisure development in the Northern Fringe.	Change second from last indicator to: Percentage of completed retail, office and leisure development in the Northern Fringe.
Table 6-1	HW2 We suggest better indicators such as the numbers of people registered with their GPs with depression as per the Ipswich AMR, the number of long term unemployed and the number of people on benefits. Measuring the number of cultural programmes is a poor indicator of deprivation and social exclusion, which shows a lack of understanding of the real needs of deprived communities.	The number of unemployed and number of people on benefits in the Northern Fringe area could be added as an indicator. Cultural programmes is just one indicator identified to build up conclusions on this matter. It considered a good indicator as Cultural Programmes are important in the community development of an area which is vital for people's well-being and establishing communities. In turn this reduces social exclusion and can improve other deprivation issues.	
Table 6-1	ER2 This should not be limited to investment in the Northern Fringe. Obviously there will be considerable investment in the Northern Fringe as it is a Greenfield site. A better indicator will be the net number of new jobs created in Ipswich Borough.	Agreed. Increase in employment or jobs in the Northern Fringe could be used instead and rates compared to other areas of Ipswich.	
Table 6-1	ER4 This indicator does not make sense as the Plan area is a greenfield site so there can't be any reduction in unemployment because there is no one living there other than Red House Farm. The same issue applies to ER5.	Agreed. Increase in employment or jobs in the Northern Fringe could be used instead and rates compared to other areas of Ipswich.	
Table 6-1	CL1 needs to measure qualifications of young people.	Indicator states: Qualifications of working age residents. Which includes young people.	
Table 6-1	CD1 Why does Hyder expect increased crime rates? In order to be sustainable we would expect crime rates (e.g. per population) to fall as this is intended to be a high quality development.	The baseline (from the State of Ipswich Report) states that Ipswich has the highest prevalence of organised crime in Suffolk and 30% of crime in Suffolk occurs in Ipswich. Thefts from motor vehicles have increased over the period 2009/10 to 2010/11. There is therefore a potential for crimes to increase due to increase in population. It should be noted, however, that the SA provides for mitigation measures, such as Secure by Design, to reduce opportunities for crime.	