

Ipswich Borough Council Local Plan

Representations made in Response to Consultation at Main Modifications Stage - In Alphabetical Order Full Redacted Representations

October 2021

Please note - Personal data has been redacted from this document in accordance with the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679). However, as part of our public task the full details of representations have been shared with the Planning Inspectors and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

Representors were advised of the Council's Privacy Policy during the consultation via the Proposed Main Modifications [webpage](#), the Proposed Main Modifications Consultation Representation Form, the Policies Map Changes Consultation Representation Form and Guidance Note to Accompany Consultation Representation Forms.

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

A

Planning Policy Team
Planning and Development
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE

23rd September 2021

Dear Planning Policy Team,

Ipswich Local Plan Review 2021 Public Consultation – ABP final response to Main Modifications

Associated British Ports submitted representations to Ipswich Borough Council via Savills Planning consultancy on 2nd March 2020, in response to requests for representations for the Ipswich Local Plan Final Draft Consultation (Appended).

We welcomed the opportunity to comment accordingly and have now reviewed the Main Modifications as circulated on 29th July 2021 with responses due at 11.45pm on 23rd September 2021.

Policy IP037 (Ipswich Island Site)

ABP notes that within Policy IP037 (Ipswich Island Site) the site is allocated for 15% Public Open Space provision. This is based on the delivery of a 421-unit scheme (46 units per acre), defined as 'High Density' (35 units per acre and above) in Policy DM29 (Provision of New Open Spaces). ABP however considers a lower density proposal of approximately 200 units (22 units per acre) is likely to be more viable on the site, which is defined in Policy DM29 as 'Medium' Density thus requiring 10% Public Open Space.

ABP would like to note that, based on the current proposed density on the Island Site, the target delivery of 10% Public Open Space, subject to viability.

Policy CS2 (The Location and Nature of Development)

The Island Site is situated within the Waterfront area to which this policy applies. As noted at para 5.21, parts of the operational port are also within it. In that context, in our representations we noted the desire of IBC to secure high-density development in the interests of maximising the use of previously developed land, subject to that not compromising heritage assets and the historic character of Ipswich.

In our submission we requested the inclusion of additional wording in the final paragraph of Policy CS2 to be amended to *"...and low elsewhere, unless otherwise agreed through masterplans and provided that in all areas it does not compromise heritage assets."*

We note that this has not been accounted for in the most recent Local Plan revision, and as noted in Policy IP037 above, the Island is still allocated for approximately 421 dwellings. ABP would like to note that this level of density on the Island will be difficult to achieve in viability terms, and instead a density of approximately 22 units per acre (circa. 200 units) will be more achievable to deliver a successful scheme.

Policy CS20 and paras 8.222 to 8.225 (Key Transport Proposals)

In our previous representation we disagreed with the inclusion of the statement at para 8.247 that “*at a minimum, a road bridge from the west bank to the Island Site...will be required to enable any significant development on the Island*” based on the fact that the site would most likely deliver lower density development than the Plan intended.

We note that this has been slightly amended to state : ‘*At a minimum, a bridge from the west bank to the island site... will be required to enable any significant development on the island... the requirement for these to be bridges will be determined when the site comes forward taking into account the detail of the development application and the extent of modal shift across the town.*’.

ABP would welcome a flexible approach to access requirements dependent on the scale and nature of any future scheme that is likely to come forward. As noted above we currently propose approximately 200 units, which we do not consider to be significant development. As per advice obtained from our transport consultant we understand that this level of development as it currently stands is not significant enough to require bridge access to the development and therefore a bridge should not be a minimum requirement.

ABP welcomes any future opportunity to discuss the matters raised within the modifications and as always are keen to work collaboratively with Ipswich Borough Council going forward on development proposals within our Ipswich portfolio.

Yours sincerely

Victoria Critchley FRICS

Head of ABP DevCo

Public Consultation for the Ipswich Local Plan Review Final Draft

15th January 2020 – 2nd March 2020

Planning and Compulsory Purchase Act 2004

Town & Country Planning (Local Planning) (England) Regulations
2012 (Regulations 19)

Consultation Comments Form



e-mail:

planningpolicy@ipswich.gov.uk

Planning Policy Team
Planning and Development
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE.

website:

www.ipswich.gov.uk

Consultation document(s) to which this comments form relates:	Core Strategy and Policies Development Plan Document Review Final Draft
Please return this comments form to:	planningpolicy@ipswich.gov.uk or Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	11.45pm Monday 2nd March 2020
This form has two parts:	Part A – Personal details
	Part B – Your comment(s).

PART A PERSONAL DETAILS		
	1. Personal details	2. Agent's details (if applicable)
Title		Mr
First name		John
Last name		Bowles
Job title (<i>where relevant</i>)		Director
Organisation (<i>where relevant</i>)	Associated British Ports	Savills
Address (<i>Please include post code</i>)		
E-mail		
Telephone No.		

PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation (<i>and client if you are an agent</i>):	Savills on behalf of Associated British Ports ('ABPorts')
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Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>ABPorts is the owner and operator of the Port of Ipswich which is the UK's leading grain exporter and largest of ABPorts' short-sea ports and which, together with ABPorts' other East Anglian Ports at Kings Lynn and Lowestoft, contributes some £360m directly into the UK economy every year and supports 3,700 jobs in the region and 5,300 jobs nationally (2019 figures).</p> <p>The Port of Ipswich provides an extensive range of facilities to meet the needs of businesses and industry based in Norfolk and Suffolk. It is the UK's leading grain exporter and largest of ABPorts' short-sea ports with the ability to handle containers, dry bulks and aggregates, forest products, general cargo and offering extensive roll-on roll-off facilities. The total port area (including water) is approximately 111 ha (275 acres) and the Port handles more than three million tonnes of goods per year. The Port is rail connected and can offer intermodal services from the Port to inland facilities including rail terminals such as ABPorts' own Hams Hall Railfreight Terminal in the Midlands. The Port is also the base for expanding marina activities.</p> <p>The importance of the Port continuing to flourish as a major economic driver in the sub-region and its 'significant role' in driving further growth in the region through future expansion is recognised in the NALEP Strategic Economic Plan and the adopted Core Strategy.</p> <p>As well as maintaining its operational activities, ABPorts is concerned to ensure that it retains the right and ability to fully use its land and infrastructure for port purposes in the performance of its statutory duties and responsibilities as a harbour undertaking. Whilst, therefore, ABPorts is keen to support the realisation of the wider development objectives and aspirations of the Core Strategy and Policies DPD Review, it must protect its 'significant (economic) role' and ability to expand further and assist in driving growth in the region. New development should be sensitive to these existing uses and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.</p> <p>The 'Island Site', which is identified by Ipswich Borough Council (IBC) and its partners as one of the key regeneration opportunities in central Ipswich, is within ABPorts' land ownership and presently accommodates successful high profile marine businesses and the commercially successful Ipswich Haven Marina (which has contributed significantly to the regeneration so far of the Waterfront area).</p> <p>ABPorts is supportive of the redevelopment of the Island Site (it is one of ABPorts' 'pathfinder projects') subject to its redevelopment being commercially viable and deliverable. ABPorts' vision for 'Ipswich Island' is that it will be a viable, high quality, sustainable, residential led mixed use development that maximises its waterfront location. The development will be true mixed use, incorporating (alongside homes); boat building, other maritime activities and leisure uses, enhancing connectivity between the site, the Town Centre and the Station as well as around the Waterfront (including via a new circular Maritime Trail).</p> <p>However, until a satisfactory scheme is agreed with IBC for its redevelopment,</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>ABPorts reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.</p> <p>ABPorts' representations on the Core Strategy and Policies DPD Review Final Draft below are made in this context.</p>
Policy CS2	<p>The Island Site is situated within the Waterfront area to which this policy applies. As noted at para 5.21, parts of the operational port are also within it. In that context, ABPorts notes the desire of IBC to secure high density development in the interests of maximising the use of previously developed land, subject to that not compromising heritage assets and the historic character of Ipswich.</p> <p>For a variety of reasons, including the mix of existing and proposed uses on the site, ABPorts' vision for the Island Site (agreed with the partners and the LEP) does not envisage 'high density' development as currently defined in Final Draft Policy DM23. Given this, ABPorts request the inclusion of additional wording in the final paragraph of Policy CS2 which should be amended as follows "...and low elsewhere, unless otherwise agreed through masterplans and provided that in all areas it does not compromise heritage assets.. " or wording of similar effect.</p>
Policy CS3	<p>ABPorts supports the regeneration objectives for the IP-One area. There are, however, important elements of the Port within or adjacent to this area. New development should, therefore, have regard to these existing port uses and activities so as to ensure that they are protected.</p> <p>The Port of Ipswich is situated both within and immediately adjoining the Waterfront area of IP-One. As well as maintaining its operational activities, ABPorts is concerned to ensure that it retains the right and ability to fully use its land and infrastructure for port purposes in the performance of its statutory duties and responsibilities as a harbour undertaking. The importance of the Port continuing to flourish as a major economic driver in the sub-region is recognised in the NALEP Strategic Economic Plan and at paragraphs 3.3, 5.6, 6.20, 8.171 – 8.172, 8.174 and 9.33.5 – 9.33.6 (consistent with the advice in the Ports NPS). ABPorts would wish to ensure that the Port's 'significant (economic) role' and ability to expand further and assist in driving growth in the region is protected.</p> <p>ABPorts requests that recognition is made in Policy CS3 and its accompanying text to the Port and to other important existing employment and other activities within and adjoining the IP-One area which the Council wishes to safeguard and support. New development should be sensitive to these existing uses and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.</p> <p>We request, therefore, the addition of a new criterion into any new policy based on Policy CS3:</p> <p>"New development should be sensitive to existing uses (including those at the Port of Ipswich) and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses."</p> <p>We note and support the inclusion of similar wording to this effect in Policy CS13.</p>
Policy CS8 and para 8.121	<p>ABP welcomes IBC's policy on housing type and tenure mix and the recognition of potential exceptions to these requirements in response, for example, to viability constraints. ABP also notes the desire of IBC to secure high density development on central sites (para 8.121) which will also assist viability. However, high density may not be appropriate in all instances.</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Policy CS12	ABPorts notes the requirement for major new development (10+ dwellings) to provide 15% affordable housing and welcomes the flexibility within the wording of Policy CS12 both in respect of the proportion of affordable housing and tenure mix where development viability justifies it.
Policy CS13	In the context of the above comments, ABPorts welcomes and supports the inclusion in Policy CS13 of reference at sub-point b. to the need to protect “ <i>land for employment uses in existing employment areas defined on the policies map, including the function and strategic role of the port to Ipswich</i> ” in response to ABPorts’ specific request for such reference in the previous Core Strategy and Policies Development Plan Document Review Preferred Options.
Policy CS20 and paras 8.222 to 8.225	<p>Provision of significant alternative east-west transport capacity has been a longstanding aspiration of Suffolk County Council (SCC), IBC and its ‘Ipswich Vision’ partners. This would provide for through traffic and relief from town centre traffic congestion (particularly on the Star Lane Gyratory), opening up access opportunities and unlocking the development and regeneration potential of the whole Ipswich Waterfront area. ABPorts has been happy to assist the Council in developing a feasible solution in relation to access to the Island site.</p> <p>In the context set out above, ABPorts will continue to assist the Council in developing a feasible solution for east-west transport capacity [and for all modes/including appropriate] access to the Island site. ABPorts also supports the efforts of IBC and SCC to bring forward proposals to secure transport capacity improvements which will benefit strategic and local traffic accessing and egressing the Port.</p> <p>In this context, ABPorts welcomes the intention of IBC to continue to make a case for highway improvements including a Wet Dock Crossing through the Local Transport Plan, and supports the recognition at para 8.243 that provision of a Wet Dock Crossing is not a pre-requisite of access improvements to enable development of the Island Site.</p> <p>In respect of the provision of additional access to the Island Site (para 8.246), whilst ABPorts is supportive of the redevelopment of the Island Site (it is one of ABPorts’ ‘pathfinder projects’), its delivery is dependent on commercial viability. Until a satisfactory scheme is agreed with IBC for its redevelopment, ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.</p> <p>ABPorts does not agree with inclusion of the statement at para 8.247 that “at a minimum, a road bridge from the west bank to the Island Site...will be required to enable any significant development on the Island”. The extent to which the existing route via St. Peter’s Dock can accommodate vehicle access, and any need for additional road access, will depend on the amount of development that can acceptably and viably be accommodated on the Island. This will need to be established through the masterplan exercise referred to in Final Draft Policy SP2 of the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review and accompanying Site Sheet IP037. Indeed, based on present thinking that the Island Site will deliver a reduced density of approximately 150 units, additional vehicular access may not be needed.</p> <p>Until the completion of the master plan exercise and the necessary technical assessments accompanying it (including transport assessment as referenced on Site Sheet 037), it is not appropriate for the DPD to be so prescriptive about the need for a new road bridge and we would request the removal of reference to it.</p> <p>ABPorts’ general support for access improvements in and around the Waterfront and onto the Island Site is conditional upon there being no adverse operational impact on the Port. ABP will continue to work with and assist SCC, IBC and its partners in securing a development solution which addresses all port safety,</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>security and operational issues and avoids any adverse impact on port and marine operations, and which accommodates the existing marina and marine businesses in the future development of the Island Site so that they continue to contribute to an active and appealing waterfront environment for further regeneration.</p> <p>ABPorts would like to see improvement of the junctions on the A14 around Ipswich in order to accommodate existing and future growth. ABPorts supports the efforts of IBC and SCC to lobby Highways England for such improvements and investigation of other potential improvements to the A14 and A12(S) corridors.</p>
Policy DM12	<p>ABPorts is supportive of IBC's desire for all new development to be well designed and sustainable, for 25% of new dwellings to be built to Building Regulations standard M4(2), and for proposals to respect the special character and distinctiveness of Ipswich including ensuring good public realm design. However, this should not be at the expense of development viability and the policy should be applied flexibly in the context of the objective to achieve sustainable regeneration.</p>
Policy DM13	<p>ABPorts notes and objects to reference in the Policy under the section titled 'Conservation Areas' to demolition of buildings and to the consideration by the Council of "the withdrawal of permitted development rights where they present a threat to the protection of the character and special interest of the conservation area" (last two bullet points).</p> <p>As a port authority, ABPorts benefits from 'permitted development' rights (as a 'statutory undertaker') over land it owns which is classed as 'operational land' (as defined under Sections 263 and 264 of the Town and Country Planning Act). Under the terms of The Town and Country Planning (General Permitted Development) Order 1995 ('the GPDO') Part 17 is applicable to development by Statutory Undertakers in England. Reliance on its permitted development rights on its operational land within the Port estate (limited by environmental regulations and other considerations) is critical to the ability of ABPorts to fulfil its statutory duties. ABPorts will therefore strongly resist any steps taken by the Council to seek to withdraw the permitted development rights it benefits from.</p> <p>If reference to withdrawal of permitted development rights in this Policy is not meant to encompass the permitted development rights enjoyed by ABPorts, we would request specific clarification of this point.</p>
Policy DM22	<p>ABPorts welcomes IBC's qualification that it will not insist on the requirement to meet Nationally Described Space Standards if this is demonstrated to be unviable in specific cases.</p>
Policy DM33	<p>ABPorts supports the safeguarding of the operational areas of the Port through their definition as Employment Areas E9 and E12 on the Policies Map and under Policy DM33. We welcome the recognition at para 9.33.6 of the need for ABPort's specific operational requirements and consents and licences for the handling and storage of hazardous substances to be taken into account in any development planned in the vicinity of these areas.</p>

PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

Please ensure that Part B of your form is attached to Part A and return both parts to the Council’s Planning Policy Team by 11.45pm on Monday 2nd March 2020.

RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

- The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.** ✓
- Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.** ✓
- Adoption of the Ipswich Local Plan Review.** ✓

PRIVACY NOTICE

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
Document Main Modifications
Sustainability Appraisal of Main Modifications
Habitats Regulations Assessment of Main Modifications

Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

29th July 2021 (9.00am) – 23rd September 2021(11.45pm)

Consultation website: <https://ipswich.oc2.uk/>
Website: www.ipswich.gov.uk/mainmodifications
Email: planningpolicy@ipswich.gov.uk

Phone: 01473 432019

Council address:

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
Ipswich IP1 2DE



Please return to:	planningpolicy@ipswich.gov.uk Planning Policy Planning and Development Ipswich Borough Council Grafton House, 15-17 Russell Road Ipswich IP1 2DE
Return by:	23rd September 2021 11.45 pm
This form has two parts:	Part A – Personal details
	Part B – Your representation(s).

PART A Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title	Ms	
First name	Victoria	
Last name	Critchley	
Job title <i>(where relevant)</i>	Head of DevCo	
Organisation <i>(where relevant)</i>	Associated British Ports	
Address <i>Please include post code</i>		
E-mail		
Telephone No.		
<p>Signature:</p> <p>Date: 23/09/21</p> <p>Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details.</p> <p>* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.</p>		

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation <i>Associated British Ports</i>	
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Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
MM230	
MM26	
MM72	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	N/A
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	N/A
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	N/A

5. Do you consider the proposed Main Modification is:

		Please tick		Please tick
5. (1) Legally compliant	Yes		No	
5. (2) Sound	Yes		No	

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

- It would not be positively prepared**
- It would not be justified**
- It would not be effective**
- It would not be consistent with national policy**

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

Please see letter attached.

Please provide a concise summary of your representation here (up to 100 words):

Please see letter attached.

3. Please set out the changes to the Main Modification you consider necessary to make

Please specify the changes to the Main Modification you consider necessary here:

Please see letter attached.

the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

B

From:
Sent: 22 September 2021 13:10
To: PlanningPolicy
Subject: RE: Public Notice Site Ref: IP035

EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe.
Hello

I am writing to give my objection to the proposed local plan site allocation notice for this area. I am a resident of , down by the bus depot (in the north-east corner of the map indicated on the notice. Here are my reasons in brief:

- This area is the only community green space in the area.
- Air pollution is already high in the area, more people = more cars = more pollution.
- The roads in the area are frequently congested already.
- A multi-storey development would block light to various dwellings in the area.
- There is no shortage of housing in this area already due to existing waterfront developments.

Many thanks,

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

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Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

29th July 2021 (9.00am) – 23rd September 2021(11.45pm)

Consultation website: <https://ipswich.oc2.uk/>
Website: www.ipswich.gov.uk/mainmodifications
Email: planningpolicy@ipswich.gov.uk

Phone: 01473 432019

Council address:

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
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Please return to:	planningpolicy@ipswich.gov.uk Planning Policy Planning and Development Ipswich Borough Council Grafton House, 15-17 Russell Road Ipswich IP1 2DE
Return by:	23rd September 2021 11.45 pm
This form has two parts:	Part A – Personal details
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PART A Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title		
First name		
Last name		
Job title <i>(where relevant)</i>	Bramford Parish Clerk	
Organisation <i>(where relevant)</i>	Bramford Parish Council	
Address <i>Please include post code</i>	Parish Room Old School House Ship Lane Bramford IPSWICH IP8 4AN	
E-mail		
Telephone No.		
<p>Signature: ...Date: 22nd September 2021</p> <p>Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details.</p> <p>* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.</p>		

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation <i>(and client if you are an agent):</i>	Bramford Parish Council
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Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
No information given. This is our comment. This make the Consultation void as no information was given to Bramford Parish Council.	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications	
No information given. This is our comment. This make the Consultation void as no information was given to Bramford Parish Council.	
Habitats Regulations Assessment of Main Modifications	
No information given. This is our comment. This make the Consultation void as no information was given to Bramford Parish Council.	
Additional evidence submitted during and after the Hearing	
No information given. This is our comment. This make the Consultation void as no information was given to Bramford Parish Council.	

5. Do you consider the proposed Main Modification is:

	Please tick		Please tick	
5. (1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
5. (2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

- It would not be positively prepared**
- It would not be justified**
- It would not be effective**

It would not be consistent with national policy

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

It was discussed at Bramford Parish Council meeting of the 20th September, (agenda attached), that because no information given to Bramford Parish Council, that the requirements stated makes the consultation void at this juncture.

The residents have approached Bramford Parish Council, telling us of their concerns, that frequent travellers onto the site with no formal checks and follow up would create policing impossible and the opportunity of crime would be increased within the area, which would include Bramford Village.

There is no secure perimeter fencing around the border of the site which has led to criminal activities outside the perimeter, both into Bramford Village and onto the A14, which has also caused damage and may cause human and animal injury.

We therefore request the courtesy of representative from Ipswich Borough Council Planning and Development Department to contact Bramford Parish Council and the residents of Bramford Village, to fully explain, through a presentation the plans and reasoning for this proposed extension.

Thank you.

Please provide a concise summary of your representation here (up to 100 words):

Same as above

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

As stated above

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

C

From:
Sent: 22 September 2021 12:03
To: PlanningPolicy

Subject: Proposed Main Modifications to Local Plan

EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe.
Hello Planning Policy,

As discussed in our recent telephone conversation, I would like to make the following comment on the Proposed Main Modifications to the Local Plan:

MM201 New Policy Felixstowe Road (IP010)

When this area is developed I think it should include a new pedestrian route from Hines Road to Derby Road near Rose Hill School for the benefit of people from the Felixstowe Road area walking to the school or to Derby Road Station (*).

The provision of the new pedestrian route would make it a pleasanter journey and there would be less chance of an accident. Derby Road is often busy and the pavement is narrow. The new route would also reduce exposure to traffic pollution, and encourage more people to walk to school and to use Derby Road Station rather than travel by car.

Best Regards,

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

E

21st September 2021
Our Ref: 15.620

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
Ipswich IP1 2DE

15 De Grey Square
De Grey Road
Colchester
Essex
CO4 5YQ

T 01206 769018
F 01206 564746

Dear Sir/Madam,

Re: Ipswich Local Plan Review 2018-2036 Proposed Main Modifications – Response on behalf of the East of England Co-operative Society

The following representations are made on behalf of the East of England Co-operative Society, specifically in relation to land within it's ownership to the east of Derby Road and north of Felixstowe Road, Ipswich (Site IP010a as referred to in the Submission Local Plan).

This land forms part of the Society's wider ownership in the area, principally in the form of the Rosehill Retail Centre which comprises part of the designated Felixstowe Road District Centre (23), which they have expanded in recent years, and which lies to the south of IP010a.

My client has engaged in earlier stages of the Local Plan process and has previously submitted a pre-application enquiry to, and subsequently engaged with, Ipswich Borough Council in relation to the remaining land, in order to explore scope to bring forward an appropriate and viable development.

The representations set out below therefore relate to the following Main Modifications:

- MM201 – New Policy Felixstowe Road, IP010;
- MM202 – New supporting text relating to this site/policy;
- PMC3 – Changes to proposals map relating to this site.

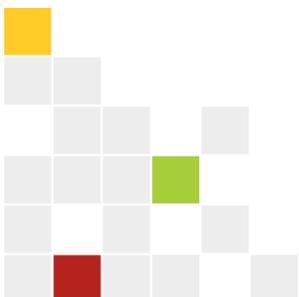
Collectively it is noted that the following captures, in summary, the nature of these changes:

“PMC3/MM201

Change: IP010a and b combined and moved from Policies SP2 and SP7 to New Policy Felixstowe Road, IP010

Reason: To ensure New Policy – Felixstowe Road (IP010) – is sufficiently precise with regard to the reservation of land to facilitate the provision of a cycle and pedestrian bridge.”

The Submission version of the Local Plan identified the sites at IP010a as land allocated for a mixture of residential and community use and IP010b as land allocated for residential use. Within the Main Modifications it is now proposed to be covered by one policy (IP010) and shown on the Policies map as land allocated for mixed residential and employment uses.



Land allocated for a primary school extension is also shown as an indicative location, marked with a symbol. The indicative location of a foot/cycle bridge/crossing is also annotated, consistent with the Submission version.

New Policy - Felixstowe Road (IP010) as proposed through the Main Modifications is now a criteria based policy which, as a consequence of merging requirements for both sites as set out in the allocations tables under Policy SP2 (and SP7) from the Submission document (such as percentage residential on mixed use sites; indicative capacity, density and delivery timescales) in a more generalized manner. It is felt that this results in a loss of clarity, amongst other practical considerations.

The criteria appear to be drawn largely from, although notably expand upon, the details contained within the "Site Sheets" contained within Appendix 3 of the Submission plan, although with a loss of clarity resulting from the merging of the two sites. The increased status of this information, which is now proposed to represent "Policy" as distinct from informative guidance, at this late stage in the plan making process is also of concern.

A series of specific objections, with associated elaboration on these general concerns, is set out below.

Object to treatment of the site as a single allocation

Merging the two previous sites (IP010a and IP010b) under a single policy does not have regard to the different ownerships, associated aspirations and circumstances relating to each site.

Further objection below to a more generalised residential coverage provides a further specific concern on one of the consequences of this approach.

In the event that the single policy approach remains, for the avoidance of doubt, it is considered essential that any combined policy should explicitly refer to potential for each site to be delivered as a separate phase accordingly.

Object to implied reduced residential coverage for western site

Within the Submission plan a residential site coverage of 75% was presented (both within the Site Sheet and the allocations table under Policy SP2). It is now referred to as a blanket 60% residential coverage across the combined site. This is of particular concern as regard to the Submission draft reveals significant differences in approach and in turn the (albeit indicative) capacity for each individual site element (at 75% and 75 dwellings for site a; and 50% and 67 dwellings for site b), detail which has been lost through the proposed single site allocation, although the overall indicative site capacity has remained the same at 137 dwellings.

It is evident (based on previous site assessment work and the pre-application process referred to above) that a significant scale and density of development is going to be required in order to overcome substantial site preparation/remediation costs and to ensure that a viable development can be achieved. Any implied reduction in the residential site coverage, density or overall capacity achievable would therefore be unacceptable in this context.

Object to increased school site requirement

It appears that the size of site required to be safeguarded for expansion of Rose Hill Primary has been increased through the Main Modifications. This is now stated as 0.8ha. Within the Submission plan it is noted that this requirement was set out explicitly as 0.5ha (within the Site Sheet) or at the most implied as 0.55ha (25% of IP010a site area of 2.22ha). No justification has been given for this increase, whilst a consequence of this being applied to future development proposals will naturally be a reduced developable residential area, with potential viability implications.

In respect of the education expansion area it is noted that the proposed supporting text acknowledges that whilst current information suggests that expansion of the school is required future forecasting may reveal different education capacity information. This appears to imply that circumstances may change. Such acknowledgement is welcomed.

Notwithstanding this it is requested that the site are required to be safeguarded in this context be returned to the previously stated 0.5ha.

Object to inclusion of detail previously within site sheet as detailed criteria

It is of concern, as a matter of principle, that information previously contained as guidance or information within the Site Sheets is now proposed to be included as “Policy” through this Main Modifications process. This is on the basis that this would now have increased status in the decision making process relative to its previous presentation within an Appendix.

Whilst in some instances the presentation of requirements covered by other existing policies of the plan within this single site allocation policy is helpful, in other respects these are overly prescriptive, for example and most notably the specific site layout requirements within criteria j.

Object to lack of explicit reference to viability considerations

Criteria o. lists a wide range of contribution requirements, whilst Criteria n. addresses the need for a RAMS contribution. In combination, and certainly having regard for the provision of land from the western part of the site for educational use, it is considered that the range and scale of such contributions could potentially render the site unviable, particularly having regard to the high remediation costs required. It is noted that Criteria o. does include the wording “as appropriate” which could provide some comfort that a degree of discretion may be applied, although it is considered that it would be preferable that direct and explicit reference be made to such requirements being subject to viability considerations.

Object to bridge requirement

Whilst it is acknowledged that requirement to safeguard a landing site for a pedestrian/cycle bridge across the railway line to link with the residential area to the north has featured in previous plans and indeed also the Submission version, it remains of considerable concern that this could further diminish the developable area of the site and harm viability of development. Furthermore reference within the proposed supporting text to the need for the development to make proportionate financial contribution towards its delivery, in addition to other contributions listed under Criteria o. and provision of land for education use (in the case of the western site) only serves to compound this issue.

It is trusted that the comments set out above are clear, and can be taken into consideration ahead of the plan being finalised for adoption. However should any further clarification or explanation be required, please do not hesitate to contact me.

Yours sincerely

Matt Clarke
Director, Head of Boyer Colchester

Boyer

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
Document Main Modifications
Sustainability Appraisal of Main Modifications
Habitats Regulations Assessment of Main Modifications

Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

29th July 2021 (9.00am) – 23rd September 2021(11.45pm)

Consultation website: <https://ipswich.oc2.uk/>
Website: www.ipswich.gov.uk/mainmodifications
Email: planningpolicy@ipswich.gov.uk

Phone: 01473 432019

Council address:

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
Ipswich IP1 2DE



Please return to:	planningpolicy@ipswich.gov.uk Planning Policy Planning and Development Ipswich Borough Council Grafton House, 15-17 Russell Road Ipswich IP1 2DE
Return by:	23rd September 2021 11.45 pm
This form has two parts:	Part A – Personal details
	Part B – Your representation(s).

PART A Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title		Mr
First name		Matt
Last name		Clarke
Job title (where relevant)	Joint Chief Executive	Director, Head of Boyer Colchester
Organisation (where relevant)	East of England Co-operative Society	Boyer
Address <i>Please include post code</i>	c/o Agent	15 De Grey Square De Grey Road Colchester Essex CO4 5YQ
E-mail	c/o Agent	
Telephone No.		

Signature:**Date: ...21st September 2021.....**

Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details.

* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation <i>(and client if you are an agent):</i>	Matt Clarke, Boyer on behalf of East of England Co-operative Society
--	--

Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
MM201	
PMC3	
MM202	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	N/A
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	N/A
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	N/A

5. Do you consider the proposed Main Modification is:

		Please tick		Please tick
5. (1) Legally compliant	Yes	X	No	
5. (2) Sound	Yes		No	X

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

<input type="checkbox"/>	It would not be positively prepared
<input checked="" type="checkbox"/>	It would not be justified
<input checked="" type="checkbox"/>	It would not be effective
<input type="checkbox"/>	It would not be consistent with national policy

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

Please see accompanying letter.

(continue on a separate sheet / expand box if necessary)

Please provide a concise summary of your representation here (up to 100 words):

The East of England Co-operative Society objects to MM201, MM202 and PMC3 in connection with New Policy - Felixstowe Road, IP010 as follows:

- Object to treatment of the site as a single allocation;
- Object to implied reduced residential coverage for western site;
- Object to increased school site requirement;
- Object to inclusion of detail previously within site sheet as detailed criteria;
- Object to lack of explicit reference to viability considerations;
- Object to bridge requirement.

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

Please see accompanying letter.

(continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.

Planning Policy Manager
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE

Co. Reg. No. 5677777

17th September 2021

Dear Sirs,

Ipswich Local Plan Proposed Main Modifications (August 2021) – Representations on behalf of East Suffolk and North Essex NHS Foundation Trust (ESNEFT) concerning Ipswich Hospital Campus, Heath Road, Ipswich

1. On behalf of our client East Suffolk and North Essex NHS Foundation Trust (ESNEFT), we write to provide our representations on the Proposed Main Modifications consultation to the Emerging Local Plan for your consideration.
2. These representations build on our previous submissions dated 25th July 2017, 13th March 2019 and 25th February 2020 concerning the Local Plan, 'Call for Sites consultation (June – July 2017)', the Local Plan Review Preferred Options consultation (November 2018), and the Local Plan Final Draft consultation (January 2020). The initial submission was on behalf of Ipswich Hospital NHS Trust, with the following submissions on behalf of East Suffolk and North Essex Foundation Trust (ESNEFT) following its merger with Colchester Hospital University NHS Trust in 2017/18.
3. The matters raised address soundness issues concerning the proposed changes to the Main Modifications, which also relate to areas of uncommon ground referred to in the Statement of Common Ground (August 2020) signed by Ipswich Borough Council, ESNEFT and Ipswich and East Suffolk Clinical Commissioning Group.
4. Whilst the outstanding soundness matters remain unresolved, the content of our representations will in our view represent a material consideration in the determination of any related planning application where draft Policy CS19 is applied. Also, with our objections in mind, only limited weight may be applied to this policy, especially in advance of them being fully considered and tested through the Local Plan review process.

Summary

5. In summary, following our earlier representations to the Final Draft consultation in February 2020, it is acknowledged that the proposed Main Modifications document, through Main Modifications 66, 68, 69 and 70, has incorporated a proportion of our suggested amendments.

Managing Director:
John Lawson, BA (Hons), MPhil, MRTPI

Directors:
Sharon Lawson, BA (Hons), DipTP, MRTPI
Georgina Brotherton, BSc (Hons), MSc, MRTPI

Associate Director:
Natalie Makepeace, BA (Hons), MSc (Dist), MRTPI

Consultant:
James Lawson, BA (Hons), MA, MRTPI

**The Coach House, East Hill House,
76 High Street, Colchester, Essex, CO1 1UF**
www.lppartnership.co.uk



6. Of note, it is welcomed that Policy CS17 (Delivering Infrastructure) now makes reference to acute hospital facilities and ESNEFT is content with these amendments which allow for developer contributions for essential healthcare services. Furthermore, within Policy CS19 (Provision of Health Services) it is acknowledged that 'further inpatient and outpatient accommodation and facilities' are identified as acceptable related uses.
7. However, Policy CS19's wording, along with its supporting text, continues to refer to 'safeguarding' the site for healthcare purposes. This runs contrary to ESNEFT's planning requirements and is also unnecessary and unreasonable. This policy basis is essentially overly restrictive and would not provide sufficient flexibility and discretion to ESNEFT to enable it to realise its development requirements and does not reflect the most appropriate strategy for the site. Consequently, whilst Policy CS19 remains as currently proposed to be amended by the Local Planning Authority (LPA), the draft Local Plan remains 'unsound' when considered against the tests set out in paragraph 35 of the NPPF, for the following reasons:
 - a. Not **Positively prepared** - The unnecessary planning conflict and inflexibility created by the safeguarding policy could prevent ESNEFT as a key NHS health care provider from meeting the area's acute healthcare needs and potentially preventing the delivery of sustainable development;
 - b. Not **Justified** – The overly restrictive approach created by the safeguarding policy does not represent an 'appropriate strategy' taking into account the more flexible reasonable alternative proposed by ESNEFT. ESNEFT's proposed approach reflects the current policy approach, which has worked well in the past, continues to be fit for purpose. The proposed approach would also enable the Hospital it to fulfil its development requirements and aspirations without the need to have to justify potential policy departures through planning applications related to the delivery of to deliver its health care services, which could be a likely consequence if the policy remains as currently drafted in the Main Modifications;
 - c. Not **Effective** – The restrictions imposed by the safeguarding policy could prevent ESNEFT from delivering its health care agenda over the plan period, which could otherwise be achieved with more appropriate policy wording as proposed;
 - d. Not **Consistent with National Policy** – The safeguarding policy which fetters ESNEFT's planning discretion, implies that the LPA is seeking to fulfil the role of a health authority, which lies beyond its legislative remit. The policy may, therefore, be ultra vires and vulnerable to challenge at both the plan making and planning application stages. In particular, to ensure faster delivery of public service infrastructure including hospitals, paragraph 96 of the NPPF refers to the need for planning authorities to work proactively with delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. Given the degree of potential and unnecessary conflict that could be generated by the safeguarding policy, the current proposed wording of CS19 essentially contravenes national policy guidance and therefore, needs to be rectified. It was hoped that this policy issue could have been discussed at the Examination in Public, although it was not identified as a specific matter to be considered at the time. Consequently, it is requested that the LPA and if necessary, the Local Plan Inspectors

give due consideration to resolving this important area of planning policy conflict as part of the Local Plan review process, to avoid potential unnecessary issues and tensions arising at the planning application stage.

8. In summary, ESNEFT considers that its estate provides sufficient land for the provision of acute healthcare services and surplus land may become available in the future and needed to help deliver key facilities. Such related developments should, therefore, be considered on their merits in line with an amended Policy CS19 as proposed by ESNEFT, without being automatically precluded by an unnecessary safeguarding requirement.
9. There are also additional legitimate concerns over the wording of parts of the supporting text at paragraph 8.230 in particular as included in the Main Modifications. Our representations in this regard, seek suitable amendments to the transport related requirements associated with Policy CS19, to acknowledge the travel mode opportunities and constraints associated with an acute hospital and to seek an equitable approach to assessing and addressing off-site parking occurrences within nearby streets.
10. Taking the above into account, it is therefore requested that further amendments are made to Policy CS19 and its supporting paragraphs 8.229 and 8.230 as detailed below.

Background

11. Following the merger of the two hospital trusts, ESNEFT is undergoing a Sustainability Transformation Plan (STP) to determine how acute hospital healthcare provision will be provided at each location. In addition, as part of a national initiative promoted by NHS England, acute hospital trusts are required to provide early delivery of additional inpatient bed spaces, which for Ipswich will support growth and resilience across the local health economy.
12. As part of these processes, significant investment in healthcare facilities and services is and will be taking place, to meet the requirements of the existing and future catchment population brought about in part by planned new housing growth included in the Local Plan. The provision of a new Emergency Department and Urgent Treatment Centre, which gained planning permission in 2019, is a key example of such investment and is due to be implemented in 2021/2022.
13. In addition to the STP workstreams, ESNEFT are also undergoing a Building for Better Care Programme which has a focus on the provision of elective care. Following an extensive public consultation process, a decision was made for a new Elective Orthopaedic Centre (EOC) to be provided on the Colchester Hospital site which permits all inpatient elective care surgery to be undertaken at Colchester. A planning application for the proposed new EOC building at Colchester was granted planning permission in June 2021.
14. To help deliver the STP and associated level of development linked with acute healthcare provision at Ipswich Hospital, a planning policy basis is required to provide for a suitable level of flexibility and certainty within which the Trust may bring forward its investment and development plans through planning applications.

Key Planning Policy Issues & Revisions Sought

15. With the above Local Plan 'soundness' issues, background and Trust estates strategy requirements in mind, our representations continue to focus on the wording of modified Policy CS19: Provision of Health Services and its associated supporting text.

CS17: Delivering Infrastructure

16. Within our representations to the Final Draft consultation in February 2020, we requested amendments to the wording of this policy that provides the basis for obtaining developer contributions towards essential infrastructure provision. We noted that while health and emergency services were referred to, there was no specific reference to acute hospital facilities.
17. The Trust are therefore content that within the Proposed Main Modifications document (Main Modification 66) the two requested amendments to this policy, to include reference to acute hospital facilities, have been incorporated. The Trust therefore supports the wording of this policy.

CS19: Provision of Health Services

18. Within our representations to the Final Draft consultation in February 2020, we requested amendments to the wording of Policy CS19, as well as to the supporting text which are referred to separately below.
19. Policy CS19 provides the basis for determining planning applications for development at the Ipswich Hospital Campus on Heath Road, however we previously raised concerns with the policies attempt to 'safeguard' the hospital site for health and ancillary uses, which was unnecessarily restrictive and inflexible.
20. As detailed in previous representations, as a statutory health authority and acute service provider, ESNEFT requires further flexibility in how it plans and develops the Hospital site, which in addition to a range of health care and ancillary uses, may also include non-health care provision should land become surplus to health care requirements over the local plan period. Therefore, it was considered the policy's wording would not enable sufficient flexibility to enable ESNEFT to realise its development requirements, reflect related legal or procedural requirements, or reflect the most appropriate strategy for the site.
21. Consequently, minor but important revisions to the Policy were requested to provide further flexibility by removing the overly restrictive safeguarding requirement and allowing for a wide range of health care and ancillary uses across the site, whilst also allowing for potential and appropriate non-health care uses to come forward as part of an overall planning strategy for the Hospital site.
22. Overall, while the modifications contained within MM68 provide for a slightly improved position to the policy wording within the Final Draft document, particularly with the inclusion of 'further inpatient and outpatient accommodation and facilities' being acceptable related uses, the changes do not go far enough, and the policy continues to be unnecessarily restrictive. This does not provide sufficient

flexibility to ESNEFT to realise its development requirements needed to provide for acute health services and facilities or reflect the most appropriate estate strategy for the site.

23. The complication is due to a continuing reference to safeguarding the site for healthcare and ancillary uses, which is an unnecessary and unreasonable policy basis and precludes the Trust's flexibility and discretion for non-healthcare related uses coming forward should the need arise.
24. The policy wording could be harmful to ESNEFT as landowner and health authority if an area(s) of land such as the surface car park at Pearson Road or at the northern part of the site, is subsequently declared surplus for healthcare purposes but needed to help cross subsidise the provision of acute care services and facilities. It would be reasonable that, in this scenario, any potential non-healthcare redevelopment option should be assessed on their individual merits rather than being restricted by a draconian safeguarding policy. This approach aligns with paragraph 96 of the NPPF (2021) which stresses the importance of proactive and positive engagement between statutory bodies and local planning authorities in planning for hospital sites and early resolution to key planning issues. With this in mind, Ipswich Borough Council (IBC) is required to work with ESNEFT to help enable appropriate public service infrastructure development to be delivered. ESNEFT's alternative proposed policy approach would provide the required flexibility to manage and develop the Ipswich Hospital site in line with its statutory function and reflected in its up to date Estates Strategy.
25. IBC, within its Statement of Common Ground (SoCG) dated August 2020, disagreed with the suggested removal of safeguarding the site and replacement wording relating to the masterplan, on the basis that the Local Plan covers an 18-year period compared to the Trust's Estate Strategy covering a five-year period. In summary, there was concern that the Trust's Strategy could form different versions across the longer Local Plan period. In addition, IBC were concerned that due to the Ipswich Hospital's location being amongst existing development, if the curtilage was to be curtailed this would impact on the ability for the hospital to expand in the future.
26. However, the site and land use are managed by ESNEFT, which has the delivery of acute health care as its statutory remit. It is therefore, for the Trust to determine what facilities and land are required to provide for its health care functions rather than the LPA which is not a health authority. If, through its Estate Strategy, ESNEFT determines that it has surplus land, the LPA should use this information as part of an evidence base and plan accordingly in consultation with the Trust. This would be a more conventional and proactive approach than resorting to the current proposed inflexible and unnecessary wording of the policy seeking to safeguard the site, which could prevent suitable development proposals from going ahead.
27. Furthermore, paragraph 93(b) of the NPPF requires local planning authorities to take account of and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community. In this regard IBC should be facilitating the implementation of ESNEFT's health care strategies rather than imposing an alternative inflexible preservation approach as set out in the currently worded draft policy. The impacts of the Covid-19 pandemic have demonstrated the necessity of undertaking different and more flexible approaches to delivering healthcare which will inevitably evolve further as the longer-term impacts on the land take and management requirements to acute health care are realised. Currently the wording of this policy does not allow ESNEFT to respond to these inevitable changes.

28. Therefore, it is requested that the policy be worded as below to incorporate our previously suggested amendments. This would provide flexibility to ESNEFT by removing the restrictive safeguarding requirement and allowing for a wider range of health care and ancillary uses across the site. IBC as Planning Authority would also maintain planning control over the type and quantum of development proposed and in consultation with ESNEFT would also be able to clarify whether sufficient land remains available for health care purposes. This approach would also allow for appropriate non-health care uses to come forward providing they would be consistent with ESNEFT's health care strategy and masterplan for the site as a whole and compatible with the prevailing pattern of land uses.
29. From ESNEFT'S perspective, IBC's current proposed planning policy approach could unnecessarily fetter its discretion, flexibility, and ability to deliver health care services through its Estates Strategy in the most appropriate way, whilst having regard to land use compatibility considerations. With this in mind, should the amendments below not be acceptable to IBC, we suggest that the Local Plan Inspectors consider the matter and if necessary, reopen the Public Examination to allow it to be discussed in further detail if necessary.

The Council supports the development of healthcare related facilities at the Heath Road Hospital Campus as identified on the policies map. Related uses may include:

- Further inpatient and outpatient accommodation and facilities;
- Staff accommodation;
- Residential care home;
- Intermediate facilities;
- Education and teaching centre;
- Therapies centre; and
- Other ancillary uses.

Proposals for new and improved healthcare, ancillary facilities and other compatible development at Heath Road Hospital Campus will be supported providing they form part of the Hospital Trust's Estate Strategy for the provision of healthcare facilities, consistent with an overall site wide masterplan prepared by the Trust and associated Transport Strategy including suitable travel plan measures and parking provision.

Paragraph 8.229

30. Within our previous representations we requested revisions to paragraph 8.229, to include additional sentences referencing Policy CS19 allowing for a range of healthcare and other compatible uses, with ancillary uses also including shared facilities to deliver a mutual benefit to other public sector organisations. In addition, it was requested that the final sentence of the paragraph, detailed below, be removed due to it covering healthcare matters beyond the scope of the Local Planning Authority's remit.

'Decisions on changes to acute care provision need to be considered in the context of their health impact, in particular the community's ability to access services appropriately and in a timely fashion.'

31. This sentence has remained within the supporting text, with the IBC justification within the SoCG being that paragraphs 20(c) and 92(c) of the NPPF confirm strategic policies should make sufficient provision for health and guard against the unnecessary loss of valued facilities and services.
32. However, paragraph 93(b) of the NPPF requires local planning authorities to take account of and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community. Therefore, our previous concerns relating to the inclusion of this sentence remain, and we again request that it be deleted.
33. ESNEFT is pleased to note that the majority of our suggested wording has been incorporated within this paragraph, as shown within Main Modification 69. That notwithstanding, it is acknowledged that 'other compatible uses' within the second sentence has been replaced with 'ancillary uses', with IBC's SoCG justification for this being that the Hospital site should be safeguarded for health care and ancillary uses, and that other compatible uses could result in non-health care related development onto parts of the site that are safeguarded for healthcare uses.
34. However, 'ancillary uses' does not provide the Trust with sufficient flexibility and does not allow for the introduction of non-health care uses where appropriate and acceptable in planning terms. Therefore, the exclusion of 'other compatible uses', along with the emphasis on 'safeguarding' referred to above, could unnecessarily restrict appropriate development proposals and create planning policy tensions. Reference to 'other compatible uses' within this supporting text would avoid potential conflicts at the planning application stage in the event that such schemes come forward.
35. Given the above, it is requested that paragraph 8.229 is amended to read as follows:

The Heath Road Hospital is a strategic health facility serving Ipswich and the surrounding area. It is important that any rationalisation of uses there takes place in the context of a planned strategy for healthcare provision which itself takes account of the future growth of Ipswich and the Ipswich Strategic Planning Area. The policy allows for a range of healthcare and other compatible uses, including staff support services to assist with recruitment and retention. Additional ancillary uses may also include shared facilities to deliver a mutual benefit to other public sector organisations aligned with the one public estate agenda.

Paragraph 8.230

36. Within our representations to the Final Draft consultation, we requested revisions to paragraph 8.230 to link any parking issues to those directly associated with proposed hospital activity related to specific developments, rather than any parking issues that may be occurring in the area generally.
37. Whilst it is noted that reference to 'hospital related developments' is now included within the first sentence under Main Modification 70, the word 'specific' has been omitted. Within the SoCG, IBC confirmed it did not agree with its insertion due to a concern that this may prevent any 'ancillary uses' developed at the hospital from being assessed in terms of travel implications, which ESNEFT is content to agree with.

38. The removal of 'existing' and insertion of 'proposed' in relation to parking issues have not been incorporated within the Main Modifications. Previously within the SoCG, IBC considered that the management of any parking issues forms an important aspect of encouraging sustainable transport, and to remove reference to 'existing' parking issues and insert 'proposed' hospital activities would result in any mitigation being too limited and ineffective in terms of encouraging sustainable transport modes which should be seen within the context of the wider transport strategy.
39. However, ESNEFT considers it to be unreasonable to insist that proposed development should tackle existing parking issues, particularly when the issues may not be associated with the Hospital. It is acknowledged that some on street parking in the locality is associated with the hospital, which has occurred historically and is of course permitted providing parking restrictions and highway safety matters are observed. However, it is also noted that nearby on street parking is additionally generated by residents and their visitors, visitors to Rushmere Heath located adjacent to the east, and to Broke Hall Community Primary School and Heathlands Community Pre-School located to the south. Therefore, existing parking issues cannot be assumed to be solely related to the hospital and it is not a matter for ESNEFT Hospital to address all pre-existing situations.
40. Consequently, the traffic, travel and parking impacts of any proposed hospital development should be considered on its individual merits, with this being particularly important where certain developments will have only a minor impact on travel and parking, and in some cases no impact at all. Therefore, an appropriate policy basis is required to ensure that an equitable resolution can be achieved.
41. This approach is consistent with paragraphs 55-57 of the NPPF (July 2021), which links planning conditions and obligations to the tests of reasonableness linked to the impact of specific development proposals i.e. in the case of planning obligations they should be necessary, directly related and fairly and reasonably related to the scale of development proposed.
42. In addition, the replacement of 'possible' with 'practicable' has not been incorporated, as IBC feel it could be misinterpreted as allowing for economic or other reasons for not pursuing sustainable modes to be used. Therefore, IBC considers that 'possible' is a more effective and robust word to use and would better serve to meet the sustainable transport vision and objectives of the Local Plan and other policies.
43. However, ESNEFT disputes this point, and considers that 'practicable' is a more appropriate word in the context of the travel mode opportunities and constraints of a working acute hospital, which is very different from many other land uses, especially when applied to potential sustainable modes of travel used by staff, patients and visitors. Again, the travel patterns and characteristics of an acute hospital are materially different from other high traffic volume generating uses. For example, staff work shift times do not always coincide with public transport timetables and related unsociable hours are also not always compatible with cycling and pedestrian provisions/options.
44. Additionally, the physical and mental state of many patients and visitors and related hospital visiting times often result in sustainable travel modes not being a viable option. Therefore, while sustainable travel can be and is often possible, for the reasons explained above it is not always 'practicable', and the text within this paragraph should be amended to reflect this position.

45. Given all of the above, it is requested that paragraph 8.230 be amended to the following:

It is also essential that the travel implications of hospital related developments are fully considered and measures are put in place to encourage the use of sustainable modes where practicable by staff, out-patients, and visitors. In particular, measures should tackle parking issues in surrounding residential areas associated with proposed Hospital activity and the Hospital should put in place monitoring to ensure that any measures are proving to be effective.

46. We trust that you will find our representations to be helpful as part of the Local Plan review process, and please contact us if you require further clarification at this stage to help address the outstanding soundness matters and related objections.

Yours sincerely

Michael Pingram
Lawson Planning Partnership Ltd

Enc.

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
Document Main Modifications
Sustainability Appraisal of Main Modifications
Habitats Regulations Assessment of Main Modifications

Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

29th July 2021 (9.00am) – 23rd September 2021(11.45pm)

Consultation website: <https://ipswich.oc2.uk/>
Website: www.ipswich.gov.uk/mainmodifications
Email: planningpolicy@ipswich.gov.uk

Phone: 01473 432019

Council address:

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
Ipswich IP1 2DE



Please return to:	planningpolicy@ipswich.gov.uk Planning Policy Planning and Development Ipswich Borough Council Grafton House, 15-17 Russell Road Ipswich IP1 2DE
Return by:	23rd September 2021 11.45 pm
This form has two parts:	Part A – Personal details
	Part B – Your representation(s).

PART A Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title		Mr
First name		Michael
Last name		Pingram
Job title (where relevant)		Senior Planner
Organisation (where relevant)	East Suffolk & Norfolk Essex NHS Foundation Trust (ESNEFT)	Lawson Planning Partnership Ltd
Address Please include post code	Heath Road Ipswich Suffolk IP4 5PD	The Coach House, East Hill House 76 High Street Colchester Essex CO1 1UF
E-mail		
Telephone No.		
<p>Signature:Date:17th September 2021.....</p> <p>Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details.</p> <p>* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.</p>		

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation <i>(and client if you are an agent):</i>	East Suffolk & North Essex NHS Foundation Trust (ESNEFT) c/o Lawson Planning Partnership Ltd
--	---

Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
MM66	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	Para 3.1.13
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	N/A
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	N/A

5. Do you consider the proposed Main Modification is:

	Please tick		Please tick	
5. (1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
5. (2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

- N/A **It would not be positively prepared**
- N/A **It would not be justified**
- N/A **It would not be effective**
- N/A **It would not be consistent with national policy**

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

Within our representations to the Final Draft consultation in February 2020, we requested amendments to the wording of this policy that provides the basis for obtaining developer contributions towards essential infrastructure provision. We noted that while health and emergency services were referred to, there was no specific reference to acute hospital facilities.

The Trust are therefore content that within the Proposed Main Modifications document (Main Modification 66) the two requested amendments to this policy, to include reference to acute hospital facilities, have been incorporated. The Trust therefore supports the wording of this policy.

Please see attached Lawson Planning Partnership Ltd representation letter dated 17th September 2021 for further details.

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

Not applicable.

Please provide a concise summary of your representation here (up to 100 words):

Following our representations within the Final Draft consultation in February 2020, our requested amendments have been incorporated within the Proposed Main Modifications document. The Trust therefore support these changes and the wording of this policy.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
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Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

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Title		Mr
First name		Michael
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Job title (where relevant)		Senior Planner
Organisation (where relevant)	East Suffolk & Norfolk Essex NHS Foundation Trust (ESNEFT)	Lawson Planning Partnership Ltd
Address Please include post code	Heath Road Ipswich Suffolk IP4 5PD	The Coach House, East Hill House 76 High Street Colchester Essex CO1 1UF
E-mail		
Telephone No.		

Signature:**Date:****17th September 2021**.....

Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details.

* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation <i>(and client if you are an agent):</i>	East Suffolk & North Essex NHS Foundation Trust (ESNEFT) c/o Lawson Planning Partnership Ltd
--	---

Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
MM68	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	Para 3.1.14
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	N/A
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	N/A

5. Do you consider the proposed Main Modification is:

		Please tick		Please tick
5. (1) Legally compliant	Yes	✓	No	
5. (2) Sound	Yes		No	✓

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

- ✓ **It would not be positively prepared**
- ✓ **It would not be justified**
- ✓ **It would not be effective**
- ✓ **It would not be consistent with national policy**

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

Within our representations to the Final Draft consultation in February 2020, we requested amendments to the wording of Policy CS19, as well as to the supporting text which are referred to separately below.

Policy CS19 provides the basis for determining planning applications for development at the Ipswich Hospital Campus on Heath Road, however we previously raised concerns with the policies attempt to ‘safeguard’ the hospital site for health and ancillary uses, which was unnecessarily restrictive and inflexible.

As detailed in previous representations, as a statutory health authority and acute service provider, ESNEFT requires further flexibility in how it plans and develops the Hospital site, which in addition to a range of health care and ancillary uses, may also include non-health care provision should land become surplus to health care requirements over the local plan period. Therefore, it was considered the policy’s wording would not enable sufficient flexibility to enable ESNEFT to realise its development requirements, reflect related legal or procedural requirements, or reflect the most appropriate strategy for the site.

Consequently, minor but important revisions to the Policy were requested to provide further flexibility by removing the overly restrictive safeguarding requirement and allowing for a wide range of health care and ancillary uses across the site, whilst also allowing for potential and appropriate non-health care uses to come forward as part of an overall planning strategy for the Hospital site.

Overall, while the modifications contained within MM68 provide for a slightly improved position to the policy wording within the Final Draft document, particularly with the inclusion of ‘further inpatient and outpatient accommodation and facilities’ being acceptable related uses, the changes do not go far enough, and the policy continues to be unnecessarily restrictive. This does not provide sufficient flexibility to ESNEFT to realise its development requirements needed to provide for acute health services and facilities or reflect the most appropriate estate strategy for the site.

The complication is due to a continuing reference to safeguarding the site for healthcare and ancillary uses, which is an unnecessary and unreasonable policy basis and precludes the Trust’s flexibility and discretion for non-healthcare related uses coming forward should the need arise.

Cont'd...

The policy wording could be harmful to ESNEFT as landowner and health authority if an area(s) of land such as the surface car park at Pearson Road or at the northern part of the site, is subsequently declared surplus for healthcare purposes but needed to help cross subsidise the provision of acute care services and facilities. It would be reasonable that, in this scenario, any potential non-healthcare redevelopment option should be assessed on their individual merits rather than being restricted by a draconian safeguarding policy. This approach aligns with paragraph 96 of the NPPF (2021) which stresses the importance of proactive and positive engagement between statutory bodies and local planning authorities in planning for hospital sites and early resolution to key planning issues. With this in mind, Ipswich Borough Council (IBC) is required to work with ESNEFT to help enable appropriate public service infrastructure development to be delivered. ESNEFT's alternative proposed policy approach would provide the required flexibility to manage and develop the Ipswich Hospital site in line with its statutory function and reflected in its up to date Estates Strategy.

IBC, within its Statement of Common Ground dated August 2020, disagreed with the suggested removal of safeguarding the site and replacement wording relating to the masterplan, on the basis that the Local Plan covers an 18-year period compared to the Trust's Estate Strategy covering a five-year period. In summary, there was concern that the Trust's Strategy could form different versions across the longer Local Plan period. In addition, IBC were concerned that due to the Ipswich Hospital's location being amongst existing development, if the curtilage was to be curtailed this would impact on the ability for the hospital to expand in the future.

However, the site and land use are managed by ESNEFT, which has the delivery of acute health care as its statutory remit. It is therefore, for the Trust to determine what facilities and land are required to provide for its health care functions rather than the LPA which is not a health authority. If, through its Estate Strategy, ESNEFT determines that it has surplus land, the LPA should use this information as part of an evidence base and plan accordingly in consultation with the Trust. This would be a more conventional and proactive approach than resorting to the current proposed inflexible and unnecessary wording of the policy seeking to safeguard the site, which could prevent suitable development proposals from going ahead.

Furthermore, paragraph 93(b) of the NPPF requires local planning authorities to take account of and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community. In this regard IBC should be facilitating the implementation of ESNEFT's health care strategies rather than imposing an alternative inflexible preservation approach as set out in the currently worded draft policy. The impacts of the Covid-19 pandemic have demonstrated the necessity of undertaking different and more flexible approaches to delivering healthcare which will inevitably evolve further as the longer-term impacts on the land take and management requirements to acute health care are realised. Currently the wording of this policy does not allow ESNEFT to respond to these inevitable changes.

Therefore as further detailed within paragraph 7 of the attached Lawson Planning Partnership Ltd representation letter, dated 17th September 2021, the draft Local Plan remains unsound when considered against the tests set out in paragraph 35 of the NPPF.

It is requested that the policy be worded to incorporate our previously suggested amendments. This would provide flexibility to ESNEFT by removing the restrictive safeguarding requirement and allowing for a wider range of health care and ancillary uses across the site. IBC as Planning Authority would also maintain planning control over the type and quantum of development proposed and in consultation with ESNEFT would also be able to clarify whether sufficient land remains available for health care purposes. This approach would also allow for appropriate non-health care uses to come forward providing they would be consistent with ESNEFT's health care strategy and masterplan for the site as a whole and compatible with the prevailing pattern of land uses.

From ESNEFT'S perspective, IBC's current proposed planning policy approach could unnecessarily fetter its discretion, flexibility, and ability to deliver health care services through its Estates Strategy in the most appropriate way, whilst having regard to land use compatibility considerations. With this in mind, should the amendments below not be acceptable to IBC, we suggest that the Local Plan Inspectors consider the matter and if necessary, reopen the Public Examination to allow it to be discussed in further detail if necessary.

Please provide a concise summary of your representation here (up to 100 words):

Policy CS19's wording, along with its supporting text, continues to refer to 'safeguarding' the site for healthcare purposes. This runs contrary to ESNEFT's planning requirements and is also unnecessary and unreasonable. This policy basis is essentially overly restrictive and would not provide sufficient flexibility and discretion to ESNEFT to enable it to realise its development requirements and does not reflect the most appropriate strategy for the site. Consequently, whilst Policy CS19 remains as currently proposed to be amended by the Local Planning Authority, the draft Local Plan remains 'unsound' when considered against the tests set out in paragraph 35 of the NPPF.

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

It is requested that Policy CS19 reads as follows:

The Council supports the development of healthcare related facilities at the Heath Road Hospital Campus as identified on the policies map. Related uses may include:

- ❖ Further inpatient and outpatient accommodation and facilities;
- ❖ Staff accommodation;
- ❖ Residential care home;
- ❖ Intermediate facilities;
- ❖ Education and teaching centre;
- ❖ Therapies centre; and
- ❖ Other ancillary uses.

Proposals for new and improved healthcare, ancillary facilities and other compatible development at Heath Road Hospital Campus will be supported providing they form part of the Hospital Trust's Estate Strategy for the provision of healthcare facilities, consistent with an overall site wide masterplan prepared by the Trust and associated Transport Strategy including suitable travel plan measures and parking provision.

Please see attached Lawson Planning Partnership Ltd representation letter dated 17th September 2021 for further details.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
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	1. Personal details*	2. Agent's details (if applicable)
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First name		Michael
Last name		Pingram
Job title (where relevant)		Senior Planner
Organisation (where relevant)	East Suffolk & Norfolk Essex NHS Foundation Trust (ESNEFT)	Lawson Planning Partnership Ltd
Address Please include post code	Heath Road Ipswich Suffolk IP4 5PD	The Coach House, East Hill House 76 High Street Colchester Essex CO1 1UF
E-mail		
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<p>Signature:Date:17th September 2021.....</p> <p>Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details.</p> <p>* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.</p>		

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation <i>(and client if you are an agent):</i>	East Suffolk & North Essex NHS Foundation Trust (ESNEFT) c/o Lawson Planning Partnership Ltd
--	---

Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
MM69	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	Para 3.1.14
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	N/A
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	N/A

5. Do you consider the proposed Main Modification is:

		Please tick		Please tick
5. (1) Legally compliant	Yes	✓	No	
5. (2) Sound	Yes		No	✓

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

- ✓ **It would not be positively prepared**
- ✓ **It would not be justified**
- ✓ **It would not be effective**
- ✓ **It would not be consistent with national policy**

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

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Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation

Please provide details of your representation here:

Within our previous representations we requested revisions to paragraph 8.229, to include additional sentences referencing Policy CS19 allowing for a range of healthcare and other compatible uses, with ancillary uses also including shared facilities to deliver a mutual benefit to other public sector organisations. In addition, it was requested that the final sentence of the paragraph, detailed below, be removed due to it covering healthcare matters beyond the scope of the Local Planning Authority's remit.

'Decisions on changes to acute care provision need to be considered in the context of their health impact, in particular the community's ability to access services appropriately and in a timely fashion.'

This sentence has remained within the supporting text, with the IBC justification within the Statement of Common Ground being that paragraphs 20(c) and 92(c) of the NPPF confirm strategic policies should make sufficient provision for health and guard against the unnecessary loss of valued facilities and services.

However, paragraph 93(b) of the NPPF requires local planning authorities to take account of and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community. Therefore, our previous concerns relating to the inclusion of this sentence remain, and we again request that it be deleted.

ESNEFT is pleased to note that the majority of our suggested wording has been incorporated within this paragraph, as shown within Main Modification 69. That notwithstanding, it is acknowledged that 'other compatible uses' within the second sentence has been replaced with 'ancillary uses', with IBC's SoCG justification for this being that the Hospital site should be safeguarded for health care and ancillary uses, and that other compatible uses could result in non-health care related development onto parts of the site that are safeguarded for healthcare uses.

However, 'ancillary uses' does not provide the Trust with sufficient flexibility and does not allow for the introduction of non-health care uses where appropriate and acceptable in planning terms. Therefore, the exclusion of 'other compatible uses', along with the emphasis on 'safeguarding' referred to above, could unnecessarily restrict appropriate development proposals and create planning policy tensions. Reference to 'other compatible uses' within this supporting text would avoid potential conflicts at the planning application stage in the event that such schemes come forward.

Therefore as further detailed within paragraph 7 of the attached Lawson Planning Partnership Ltd representation letter, dated 17th September 2021, the draft Local Plan remains unsound when considered against the tests set out in paragraph 35 of the NPPF.

Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide a concise summary of your representation here (up to 100 words):

Following our representations to the Final Draft consultation, ESNEFT are pleased the majority of our suggested wording has been incorporated within paragraph 8.229, as shown within Main Modification 69. However a sentence previously requested to be removed due to it covering healthcare matters beyond the scope of the Local Planning Authority's remit remains, while 'other compatible uses' within the second sentence has been replaced with 'ancillary uses'. This does not provide the Trust with sufficient flexibility or allow for the introduction of non-health care uses where appropriate and acceptable in planning terms, which could result in future planning policy tensions within any future planning application.

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

It is requested that paragraph 8.229 is amended to read as follows:

The Heath Road Hospital is a strategic health facility serving Ipswich and the surrounding area. It is important that any rationalisation of uses there takes place in the context of a planned strategy for healthcare provision which itself takes account of the future growth of Ipswich and the Ipswich Strategic Planning Area. The policy allows for a range of healthcare and other compatible uses, including staff support services to assist with recruitment and retention. Additional ancillary uses may also include shared facilities to deliver a mutual benefit to other public sector organisations aligned with the one public estate agenda.

Please see attached Lawson Planning Partnership Ltd representation letter dated 17th September 2021 for further details.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
Document Main Modifications
Sustainability Appraisal of Main Modifications
Habitats Regulations Assessment of Main Modifications

Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

29th July 2021 (9.00am) – 23rd September 2021(11.45pm)

Consultation website: <https://ipswich.oc2.uk/>
Website: www.ipswich.gov.uk/mainmodifications
Email: planningpolicy@ipswich.gov.uk

Phone: 01473 432019

Council address:

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
Ipswich IP1 2DE



Please return to:	planningpolicy@ipswich.gov.uk Planning Policy Planning and Development Ipswich Borough Council Grafton House, 15-17 Russell Road Ipswich IP1 2DE
Return by:	23rd September 2021 11.45 pm
This form has two parts:	Part A – Personal details
	Part B – Your representation(s).

PART A Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title		Mr
First name		Michael
Last name		Pingram
Job title (where relevant)		Senior Planner
Organisation (where relevant)	East Suffolk & Norfolk Essex NHS Foundation Trust (ESNEFT)	Lawson Planning Partnership Ltd
Address Please include post code	Heath Road Ipswich Suffolk IP4 5PD	The Coach House, East Hill House 76 High Street Colchester Essex CO1 1UF
E-mail		
Telephone No.		
<p>Signature:Date:17th September 2021.....</p> <p>Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details.</p> <p>* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.</p>		

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation (and client if you are an agent):	East Suffolk & North Essex NHS Foundation Trust (ESNEFT) c/o Lawson Planning Partnership Ltd
---	---

Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
MM70	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	Para 3.1.14
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	N/A
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	N/A

5. Do you consider the proposed Main Modification is:

		Please tick		Please tick
5. (1) Legally compliant	Yes	✓	No	
5. (2) Sound	Yes		No	✓

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

- ✓ **It would not be positively prepared**
- ✓ **It would not be justified**
- ✓ **It would not be effective**
- ✓ **It would not be consistent with national policy**

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

Within our representations to the Final Draft consultation, we requested revisions to paragraph 8.230 to link any parking issues to those directly associated with proposed hospital activity related to specific developments, rather than any parking issues that may be occurring in the area generally.

Whilst it is noted that reference to ‘hospital related developments’ is now included within the first sentence under Main Modification 70, the word ‘specific’ has been omitted. Within the Statement of Common Ground, IBC confirmed it did not agree with its insertion due to a concern that this may prevent any ‘ancillary uses’ developed at the hospital from being assessed in terms of travel implications, which ESNEFT is content to agree with.

The removal of ‘existing’ and insertion of ‘proposed’ in relation to parking issues have not been incorporated within the Main Modifications. Previously within the SoCG, IBC considered that the management of any parking issues forms an important aspect of encouraging sustainable transport, and to remove reference to ‘existing’ parking issues and insert ‘proposed’ hospital activities would result in any mitigation being too limited and ineffective in terms of encouraging sustainable transport modes which should be seen within the context of the wider transport strategy.

However, ESNEFT considers it to be unreasonable to insist that proposed development should tackle existing parking issues, particularly when the issues may not be associated with the Hospital. It is acknowledged that some on street parking in the locality is associated with the hospital, which has occurred historically and is of course permitted providing parking restrictions and highway safety matters are observed. However, it is also noted that nearby on street parking is additionally generated by residents and their visitors, visitors to Rushmere Heath located adjacent to the east, and to Broke Hall Community Primary School and Heathlands Community Pre-School located to the south. Therefore, existing parking issues cannot be assumed to be solely related to the hospital and it is not a matter for ESNEFT Hospital to address all pre-existing situations.

Consequently, the traffic, travel and parking impacts of any proposed hospital development should be considered on its individual merits, with this being particularly important where certain developments will have only a minor impact on travel and parking, and in some cases no impact at all. Therefore, an appropriate policy basis is required to ensure that an equitable resolution can be achieved.

Cont'd...

This approach is consistent with paragraphs 55-57 of the NPPF (July 2021), which links planning conditions and obligations to the tests of reasonableness linked to the impact of specific development proposals i.e. in the case of planning obligations they should be necessary, directly related and fairly and reasonably related to the scale of development proposed.

In addition, the replacement of 'possible' with 'practicable' has not been incorporated, as IBC feel it could be misinterpreted as allowing for economic or other reasons for not pursuing sustainable modes to be used. Therefore, IBC considers that 'possible' is a more effective and robust word to use and would better serve to meet the sustainable transport vision and objectives of the Local Plan and other policies.

However, ESNEFT disputes this point, and considers that 'practicable' is a more appropriate word in the context of the travel mode opportunities and constraints of a working acute hospital, which is very different from many other land uses, especially when applied to potential sustainable modes of travel used by staff, patients and visitors. Again, the travel patterns and characteristics of an acute hospital are materially different from other high traffic volume generating uses. For example, staff work shift times do not always coincide with public transport timetables and related unsociable hours are also not always compatible with cycling and pedestrian provisions/options.

Additionally, the physical and mental state of many patients and visitors and related hospital visiting times often result in sustainable travel modes not being a viable option. Therefore, while sustainable travel can be and is often possible, for the reasons explained above it is not always 'practicable', and the text within this paragraph should be amended to reflect this position.

Therefore as further detailed within paragraph 7 of the attached Lawson Planning Partnership Ltd representation letter, dated 17th September 2021, the draft Local Plan remains unsound when considered against the tests set out in paragraph 35 of the NPPF.

Please provide a concise summary of your representation here (up to 100 words):

Within MM70, the replacement of 'existing' with 'proposed' in relation to parking issues hasn't been incorporated. ESNEFT considers it unreasonable to insist proposed development should tackle existing parking issues, particularly when they may not be associated with the Hospital. Traffic, travel and parking impacts of hospital development should be considered on its individual merits, consistent with NPPF paragraphs 55-57.

In addition, the replacement of 'possible' with 'practicable' hasn't been incorporated as it could be misinterpreted as allowing for economic or other reasons for not pursuing sustainable travel modes. ESNEFT dispute this and consider 'practicable' more appropriate in the context of the travel opportunities and constraints of a working acute hospital.

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

It is requested that paragraph 8.230 be amended to the following:

It is also essential that the travel implications of hospital related developments are fully considered and measures are put in place to encourage the use of sustainable modes where practicable by staff, out-patients, and visitors. In particular, measures should tackle parking issues in surrounding residential areas associated with proposed Hospital activity and the Hospital should put in place monitoring to ensure that any measures are proving to be effective.

Please see attached Lawson Planning Partnership Ltd representation letter dated 17th September 2021 for further details.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.



Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE

Your ref:
Our ref:
Date: 23rd September 2021
Please ask for:
Customer Services: 03330 162 000
Direct dial:
Email:

Dear

Ipswich Local Plan Review – Main Modifications consultation

Thank you for consulting East Suffolk Council on the consultation on the proposed Main Modifications to the Ipswich Local Plan Review. East Suffolk Council continues to be supportive of the Ipswich Borough Council Local Plan Review, and this response reflects comments that the Council has raised in response to the Ipswich Local Plan Review Final Draft (January 2020), the agreements made through the Statement of Common Ground between the two authorities (June 2020, document A25 in the Core Document Library) and the Hearings Statements submitted by East Suffolk Council in November 2020 on Matter 3 and Matter 6. As per our representation to the Ipswich Local Plan Review Final Draft (January 2020), the Council does not raise any issues in relation to the overall soundness of the Ipswich Local Plan, however wishes to comment on a number of the Main Modifications as set out below.

MM8/MM9/MM12

Table 8.1, setting out the housing need across the Ipswich Housing Market Area is proposed to be updated to include the more recent figures as calculated under the standard methodology. Whilst these figures reflect the ISPA Statement of Common Ground published in June 2020 (document A21 in the Core Document Library), the figure of 542 dwellings per annum, that is proposed to be deleted, is the housing requirement that has been adopted in the Suffolk Coastal Local Plan and it may therefore be more appropriate to incorporate this figure into any calculations of proposed ISPA-wide housing growth.

MM14

The proposed changes which include the addition of new criteria g) and h) to Policy ISPA2 'Strategic Infrastructure Priorities' reflect the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT
DX: 41400 Woodbridge

POSTAL ADDRESS Riverside, 4 Canning Road, Lowestoft NR33 0EQ
DX: 41220 Lowestoft

MM15/MM16

The proposed changes set out under MM15 and MM16 to paragraph 8.21 and Policy ISPA3 'Cross-boundary mitigation of effects on Protected Habitats and Species' reflect the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

MM17

The Council notes there are a number of proposed modifications to Policy ISPA4 'Cross Boundary Working to Deliver Sites', in particular to the text related to Land at the Northern end of Humber Doucy Lane. This land forms part of a cross-boundary approach to growth, with land for approximately 150 dwellings allocated in the Suffolk Coastal Local Plan under policy SCLP12.24. The Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) set out agreement on some changes to the policy, including the inclusion of reference to the maintenance of separation between Ipswich and the surrounding settlements and inclusion of provision of an early years setting, and it is noted that these changes are proposed to be incorporated. These changes bring the policy into closer alignment with Policy SCLP12.24. The Council also supports the proposed deletion of reference to Suitable Alternative Natural Greenspace being provided on both sides of the boundary, for the reasons set out in our response to the Ipswich Local Plan Review Final Draft, in order to provide an appropriate level of flexibility.

For clarity a change to one part of the proposed modifications to this policy is suggested (shown shaded below):

"23.28ha of land comprising at the northern end of Humber Doucy Lane, identified on the Policies Map as ISPA4.1, is allocated for 449 dwellings and associated infrastructure to come forward in conjunction with land allocated under Policy SCLP12.24 in the Suffolk Coastal Local Plan in East Suffolk as a cross boundary site."

MM49

The proposed amendments to Policy CS11 'Gypsy and Traveller Accommodation' in relation to the provision of short stay stopping sites are consistent with the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

MM66/MM99/MM102

The Council's response to the Ipswich Local Plan Review Final Draft set out that the Council is supportive of Ipswich Borough Council's positive commitment to the delivery and funding of modal shift mitigation through a transport mitigation strategy as part of collaborative working through the ISPA Board. The Council notes the proposed modifications to Policy CS17 'Delivering Infrastructure', under MM66, to Policy DM21 'Transport and Access in New Developments', under MM99, and to Policy DM22 'Car and Cycle Parking in New Development', under MM102, that further the Ipswich Local Plan's positive commitment to meeting the objectives for modal shift as per the Ipswich Strategic Planning Area Statement of Common Ground (document A21 in the Core

Document Library). However, under the proposed modifications to Policy CS17 it is not clear why only off-site works or financial contributions are sought towards sustainable transport improvements, as there may be opportunities for on-site measures that would support modal shift.

MM84/MM85

The proposed changes set out under MM84 to Policy DM8 'The Natural Environment', through the addition of the three new paragraphs related to European sites and the Recreational Disturbance Avoidance and Mitigation Strategy, and the proposed changes to paragraph 9.8.2 under MM85 reflect the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

MM140

The proposed Main Modification to the targets related to strategic working set out that joint master planning with East Suffolk Council of the land north of Humber Doucy Lane would be completed by 2026/27. Whilst Policy SCLP12.24 of the Suffolk Coastal Local Plan also envisages a master planned approach for the whole site, as the timescale for delivery of the site is dependent upon education infrastructure provision it may be more appropriate to refer to undertaking master planning at an appropriate point in time to facilitate development coming forward. Further, the master planning could be developer-led, and the approach should be flexible at this stage.

Please do not hesitate to contact me should you wish to discuss any of the comments above.

Yours Sincerely,

| Principal Planner (Policy and Delivery)

East Suffolk Council



Ipswich Borough Council
Grafton House 15-17 Russell Road
IPSWICH
IP1 2DE

Our ref: AE/2021/126401/01-L01
Your ref: *
Date: 22 September 2021

Dear

IPSWICH LOCAL PLAN - MAIN MODIFICATION DOCUMENTS

Thank you for the opportunity to comment on the Main Modification Document related to the Ipswich Local Plan. We have reviewed the proposed modifications to the plan and are satisfied with the changes that relate to our remit.

Since we previously commented on the Local Plan climate change allowances have been updated, the new national guidance link can be found at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

We trust this information is useful.

Yours Sincerely

Planning Advisor

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

F

From:
Sent: 10 August 2021 19:29
To:
Subject: Re: Public Consultation on Proposed Main Modifications to the Core Strategy and Polices Development Plan Document (DPD) and Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD

Yes please

Get Outlook for Android

From:
Sent: Tuesday, August 10, 2021 10:32:01 AM
To:
Subject: RE: Public Consultation on Proposed Main Modifications to the Core Strategy and Polices Development Plan Document (DPD) and Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD

Hello,

Thank you for clarifying this. Would you like this comment formally recorded as part of the main modifications consultation?

Kind regards

Planning Policy Officer
www.ipswich.gov.uk
www.facebook.com/IpswichGov
twitter.com/IpswichGov

From:
Sent: 09 August 2021 17:39
To:
Subject: Re: Public Consultation on Proposed Main Modifications to the Core Strategy and Polices Development Plan Document (DPD) and Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD

Hi

It was just the note on the website saying the council thinks the knocking down of the old co-op along Prince of Wales isn't viable or cost effective.

It was just to clarify this

Thanks

Get Outlook for Android

From:

Sent: Monday, August 9, 2021 4:40:12 PM

To:

Subject: RE: Public Consultation on Proposed Main Modifications to the Core Strategy and Policies Development Plan Document (DPD) and Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD

Dear,

I am following up on an email you sent on the 29th July 2021, apologies for the delay in coming back to you. Could you possibly elaborate on the issue being raised? If you would like more information about the main modifications consultation we would be happy to answer any questions you may have.

Kind regards

Planning Policy Officer
www.ipswich.gov.uk
www.facebook.com/IpswichGov
twitter.com/IpswichGov

From:

Sent: 29 July 2021 17:39

To:

Subject: Re: Public Consultation on Proposed Main Modifications to the Core Strategy and Policies Development Plan Document (DPD) and Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD

Hi

So the word unviable for the Council to progress means the site won't be developed?

Is this what I'm reading

Thanks

Sent from my iPhone

On 29 Jul 2021, at 09:24,
Dear Sir/Madam,

Please see attached.

Kind regards,

If you wish to be taken off our email list please reply to this email or to PlanningPolicy@ipswich.gov.uk

Business Support Officer
Planning and Development
Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1
2DE

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

H

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
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Sustainability Appraisal of Main Modifications
Habitats Regulations Assessment of Main Modifications

Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

29th July 2021 (9.00am) – 23rd September 2021(11.45pm)

Consultation website: <https://ipswich.oc2.uk/>
Website: www.ipswich.gov.uk/mainmodifications
Email: planningpolicy@ipswich.gov.uk

Phone: 01473 432019

Council address:

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
Ipswich IP1 2DE



Please return to:	planningpolicy@ipswich.gov.uk Planning Policy Planning and Development Ipswich Borough Council Grafton House, 15-17 Russell Road Ipswich IP1 2DE
Return by:	23rd September 2021 11.45 pm
This form has two parts:	Part A - Personal details
	Part B - Your representation(s).

PART A Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title		
First name		
Last name		
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		
Address <i>Please include post code</i>		
E-mail		
Telephone No.		
<p>Signature: _____ Date:</p> <p>Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details.</p> <p>* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.</p>		

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation <i>(and client if you are an agent):</i>	
--	--

Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
REF OLD BRIDGE WARD SOCIAL CLUB	MM168
AUSTIN STREET. CODE MM168	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	

5. Do you consider the proposed Main Modification is:

		Please tick		Please tick
5. (1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input checked="" type="checkbox"/>
5. (2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input checked="" type="checkbox"/>

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

- It would not be positively prepared
- It would not be justified
- It would not be effective
- It would not be consistent with national policy

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

BEHIND OLD BRIDGEWARD
SOCIAL CLUB. RESIDENTS INCLUDING MYSELF
ARE CONCERNED ABOUT THE SITE MATTERS
ON YOUR YELLOW NOTICE AT END OF ROAD
REF IS DWELLINGS ON THE OLD CLUB
SITE. MORE TO POINT ROAD ACCESS BEING
SUGGESTED IN COMING IN AND OUT OF
SITE USING OUR ROAD SEYMOUR ROAD. WE
NEED CLARITY ON WHAT IS BEING PLANNED
AS MAKING NEW ACCESS FROM OUR STREET
AFFECTS US, AFFECTS THE ROAD, AND PROPERTY
(continue on a separate sheet / expand box if necessary) PRICES

Please provide a concise summary of your representation here (up to 100 words):

REF BRIDGEWARD CLUB SITE AUSTIN STREET.
WE DON'T WANT VEHICLE ACCESS TO AND
FROM AREA USING SEYMOUR ROAD. WE
OPPOSE ANY PLAN FOR THAT. WE DON'T
RECOGNISE THAT AS FAIR. PLEASE READ
SEPARATE PAGE

CODE MM 168

①

SITE BETWEEN AUSTIN STREET
AND SEYMOUR ROAD IPSWICH
REFERENCE OLD BRIDGEWARD SOCIAL
CLUB.

MUCH DIFFERENT THAN IT IS TODAY,
MUCH QUIETER, LOUDEST PLACE TO LIVE
VERY MUCH HAS CHANGED NOW THOU
PARKING HAS ALWAYS BEEN AN ISSUE
BUT FAR WORSE NOW THAN IT EVER HAS
BEEN. IN 1944 NOT SO MANY CARS THEN
AS IS TODAY. WE HAVE ANOTHER ISSUE
CAUSE A FEW YEARS AGO THE BRIDGEWARD
COUNCIL PUT DOWN YELLOW LINES
AT TOP OF SEYMOUR ROAD. IT WAS DONE
CAUSE BINNION WERE HAVING DIFFICULTY
GETTING BINTRUCK INTO SEYMOUR ROAD, SO
YELLOW LINES SORTED THAT ISSUE OUT BUT
CAUSED ANOTHER ISSUE. IT TOOK 6 CM
PARKING SPACE FROM SEYMOUR ROAD,
WHICH MEANT THAT THE CARS THAT WERE
PARKED UP TOP OF ROAD MOVE DOWN
SEYMOUR ROAD CAUSING PARKING ISSUES TO
EVERYONE ELSE. IN ROAD THAT OWNS A CAR
THE HOME IN SEYMOUR ROAD ARE
PREDOMINANTLY TWO BED HOMES, 2 BED
TERRACE HOUSES THERE IS 3 BED BUT

P10

202

CONTINUUM.

MOST AN 2 ISD HOMES - NOW WE
HAVE ANOTHER ISSUE IN SEYMOUR ROAD
WHERE A PERSON LOUDED
SEYMOUR ROAD FEW YEARS AGO. AND
WAS ABOUT BY COUNCIL TO TURN
INTO AN HMO PROPERTY. AT ONE POINT

UP THERE IF THAT WASN'T WAD ENOUGH
5 OR 6 HMO CANS. SEYMOUR ROAD
CANNOT SUPPORT THAT MANY
VEHICLES IF EXTRA VEHICLES, ITS
MY UNDERSTANDING THERE IS A GROUP
OF OTHER HOUSE IN ROAD (SEYMOUR ROAD)
WITH MULTIPLE OCCUPANTS, ALL WITH
CARS TOO. PRESSURE FOR PARKING
IS QUITE AT FULL CAPACITY. MANY RESIDENTS
HAVE PARKING ARGUMENTS, CARS ARE
SOME PL. LAST THING SEYMOUR ROAD NEED
IS WALL TO OLD BRIDGE WARD CLUB (COMM)
DOWN SO A BUILDING WITH NO CAR
FOR DON PEACE AND QUIET, OUR QUALITY
OF LIFE ARE DISTURBED BY TRAFFIC
FROM 15 DWELLINGS SOME ON THE
FRANCIS SOCIAL CLUB SITE, MY
MAIN OBJECTION IS HAVING TO PUT
UP WITH NOISE / CARS, PETROL FUMES
FROM 15 DWELLINGS. IF THE PROPOSED
PLAN AS I UNDERSTAND THEM TO BE
FOR VEHICULAR ACCESS TRUCKS ON
ROAD SEYMOUR ROAD. TO US ITS
UNFAIR / CAUSE THE ROAD CAN'T
SUPPORT EXTRA 15 DWELLINGS AND

15 TO 20 + CERTAIN CARS, IT WOULD MAKE TOP OF SEYMOUR ROAD WHERE RECTORY ROAD SO5 PAST END OF SEYMOUR ROAD MORE DANGEROUS THAN IT IS ALREADY. CARS TURNING RIGHT ONTO RECTORY ROAD FROM SEYMOUR ROAD HEAD TO JUNCTION WITH BELSTAR ROAD ALREADY HAS TO WEAVE THROUGH CARS PARKED ON LEFT AND CARS PARK HALF ON PAVEMENT HALF ON ROAD SO THE PEDESTRIANS CAN'T EVEN WALK ON PAVEMENT CAUSE CARS ARE PARKED ON RIGHT SIDE FROM SEYMOUR ROAD ONTO RECTORY ROAD GOING TOWARDS BELSTAR ROAD. WE OFTEN SEE PEDESTRIANS ACTUALLY WALKING ON ROAD, SO ITS PRETTY DANGEROUS NOW BUT IF OUR TRAFFIC COMING FROM THE PROPOSED IF DUBLIN USING OUR ROAD (SEYMOUR ROAD FOR VEHICLE ACCESS, RECTORY ROAD / BELSTAR ROAD JUNCTION) CAUSE OF ITS POOR DESIGN IS DANGEROUS NOW TO SEE IF ANY VEHICLES ARE COMING DOWN BELSTAR ROAD A VEHICLE HAS TO COME RIGHT OUT INTO MIDDLE OF ROAD TO SEE ANYTHING COME DOWN FROM STOKY PARK DIRECTION, SO AREA WOULD BECOME MORE DANGEROUS FOR DRIVERS AND PEDESTRIANS (ESPECIALLY PEDESTRIANS USING CROSSING THAT IS ON BELSTAR ROAD QUITE CLOSE TO JUNCTION WITH RECTORY ROAD. SO THE PROPOSED PLANS FOR IF DUBLIN ON THE OLD BRIDGEWAND SITE WILL IMPACT SAFETY TOO.

DJD

94

I HAVE ~~VIEWED~~ ^{VIEWED} THE SITE BOUNDARY PLAN ON THE NOTICE AT END OF ROAD THE OLD CLUB BOUNDARY AS YOU HAVE DRAWN IT OUT ON YOUR NOTICE. IT LIKE SITE IS GOING TO BE LARGER AS PLAN SHOWS THE OLD BOUNDARY TO THE OLD CLUB WHICH IS IN LINE WITH CORNER OF OUR ROAD (SEYMOUR ROAD) BUT YOUR PLAN SHOWS ANOTHER SECTION TO THE WEST OF CLUB BOUNDARY THAT IS GOING TO PASS BY NEW SITE. IF THAT IS CASE YOU CANT A NEW PIECE OF ROAD BE PUT IN GOING OFF THAT BOTTOM LEFT CORNER OF SITE SIDE ON TO AUSTIN STREET SINGLY THERE IS ROOM AT THERE AND BETWEEN PROPOSED ROAD THERE OPENING UP OUR ROAD (SEYMOUR ROAD) CANT BE THE ONLY OPTION.

WE WILL OPPOSE ANY PLAN THAT INVOLVES VEHICULAR ACCESS THROUGH SEYMOUR ROAD. WE DID WITH FIRST APPLICATION AND WE WILL FOR THE NEXT ONE. POLICE OBJECTED FIRST TIME (SEE HIGHWAYS OBJECTED TOO SO THEY PROBABLY WILL OBJECT PD SO AGAIN. BUT NOTHING AGAINST NEW HOUSING WHATSOEVER, BUT I AND SEYMOUR ROAD AN ALTERNATIVE ROAD RESIDING CERTAINLY WOULD SUPPORT ACCESS THROUGH SEYMOUR ROAD, IT AFFECTS OUR HOUSE PRICES, NOISE THAN MORE TRAFFIC MAINTENANCE. YOURS SINCERELY

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

OUR MAIN CONCERN IN SEY/MOUR NO2
IS IF THE FUTURE PLAN IS FOR THE
OLD BRIDGE WARD WITH SET-PLANNING
PERMISSION TO HAVE ACCESS IN AND OUT
OF ANY NEW DEVELOPMENT COMING THROUGH
SEY/MOUR ROAD. WE WOULD OBJECT TO
THAT AND WE IN SEY/MOUR WARD WILL OPPOSE IT

(continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.

ONE OTHER CONCERN IS MORE
ACCESS TO PEOPLE COMING THROUGH
THE NEW PLANNED DEVELOPMENT IF EVER
A PLANNING APPLICATION SOBS IN AGAIN IN FUTURE
WITH INTENTIONS OF GETTING ACCESS
THROUGH SYMOUR ROAD, WE WOULDN'T WANT
PEOPLE USING IT AS SHORT CUT
THROUGH THE OLD CLUB SITE. YEARS
AGO MEMBERS OF CLUB HAD KEY TO SITE
IN WALL AT BOTTOM OF SYMOUR ROAD.
WELL THAT CAUSED ISSUES IN ROAD WITH
DAMAGE AGAIN DONE TO PARKING CAN
SO CLUB STOPPED MEMBERS USING
THAT SITE. WE WOULD NOT WANT TO FACE
SAME ISSUES IF CLUB SITE EVER DEVELOPED
IN A WAY THAT SITE ACCESS IN ANY WAY
FROM AUSTIN STREET

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
Document Main Modifications
Sustainability Appraisal of Main Modifications
Habitats Regulations Assessment of Main Modifications

Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

29th July 2021 (9.00am) – 23rd September 2021(11.45pm)

Consultation website: <https://ipswich.oc2.uk/>
Website: www.ipswich.gov.uk/mainmodifications
Email: planningpolicy@ipswich.gov.uk

Phone: 01473 432019

Council address:

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
Ipswich IP1 2DE



Please return to:	planningpolicy@ipswich.gov.uk Planning Policy Planning and Development Ipswich Borough Council Grafton House, 15-17 Russell Road Ipswich IP1 2DE
Return by:	23rd September 2021 11.45 pm
This form has two parts:	Part A – Personal details
	Part B – Your representation(s).

PART A Personal Details

	1. Personal details*	2. Agent's details (if applicable)
Title		
First name		
Last name		
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		
Address <i>Please include post code</i>		
E-mail		
Telephone No.		

Signature: .

....Date: 22/9/2021

Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details.

* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation <i>(and client if you are an agent):</i>	
--	--

Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
MM168	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	

5. Do you consider the proposed Main Modification is:

		Please tick		Please tick
5. (1) Legally compliant	Yes		No	<input checked="" type="checkbox"/>
5. (2) Sound	Yes		No	<input checked="" type="checkbox"/>

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

- It would not be positively prepared
- It would not be justified
- It would not be effective
- It would not be consistent with national policy

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

I have issues with the proposed plans as follows:
Access to this proposed dwelling site should not be via Seymour Road! It is already difficult and not safe to get in and out of the Road, as you cannot see the traffic coming from the left of Rectory Road. With all the extra vehicles this will be made much worse. These roads are only just able to cope with current traffic volume and are not wide enough to cope with any more.

* Continued on another page - See (continue on a separate sheet / expand box if necessary) attached page*

Please provide a concise summary of your representation here (up to 100 words):

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

I feel that access to these dwellings should be elsewhere and not through Seymour Rd. It is not safe for residents of Seymour Rd and Rectory and not for our cars as I can see more cars getting hit/damaged and accidents taking place.

(continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.

Continued

22/9/2021

We/myself and local residents put in a letter in 2019 to the Council regarding the proposed planning application at that time. This set out various points and issues with this and I would appreciate if you would refer to this, as this included several aspects and issues with this! The police also sent you a letter of objection to these proposed dwellings, and access being opened up and exposing Seymour Road to the high crime rate from Austin Street area, again this should be taken into consideration before doing this.

It is already difficult to park in the road some evenings, and with more cars from the dwellings proposed, ~~and~~ this would be worse and is not fair that you cannot park your car.

My other concern is with all the diggers/plant vehicles coming through our road. Increased noise and also increased chances of our vehicles being damaged.

Other access to this site should be sought and not via Seymour and Peetey Road.

P.T.O

This proposed dwelling affects Rectory Road too and I really feel that one of your notices should have been placed in that road to make these residents aware of this too.

I understand more housing is needed, but I really think all these issues should be considered and addressed.

Yours faithfully



Historic England

Ipswich Borough Council
Grafton House
15 - 17 Russell Road
Ipswich
Suffolk
IP1 2DE

Direct Dial: 01223 582748

Our ref: PL00121006

17 September 2021

Dear

Re: Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Thank you for consulting Historic England on the Ipswich Local Plan Review 2018-2036 Proposed Main Modifications. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.

We welcome the production of this consultation paper, but do not currently have capacity to provide detailed comments on every modification, and have instead focussed on those issues raised by Historic England in our Regulation 18 and 19 responses, and which have subsequently been resolved via the preparation of the our Statement of Common Ground, October 2020 (Document I30.1). I hope you find the following observations helpful.

GENERAL COMMENTS

We understand that the consultation comprises two main documents:

- (1) Core Strategy and Policies Development Plan Document Main Modifications; and
- (2) Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Main Modifications

We welcome the various changes to the structure of the Plan which have substantially improved its legibility making it much easier to follow.

CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT MAIN MODIFICATIONS



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



We welcome the inclusion of the changes agreed through our Statement of Common Ground, October 2020 (Document I30.1). In particular the additional supporting text for Policy DM14 (Archaeology) highlighting the presence of Scheduled Monuments within Opportunity Areas A and B, and the addition of criterion 'I' in Policy DM15 (Tall Buildings) which now includes reference to scheduled monuments, and the importance of setting in considering impacts on the historic environment. We particularly pleased to see the amendment to the Tall Building Arc (reference PCM39) to pull back the arc boundary in the immediate vicinity of the Grade I listed Willis Building and the churchyards of St Peter's Church, St Mary at the Quay, and St Nicholas Churches.

Finally, we're pleased to see inclusion of revised policy wording and supporting text (paragraph 8.26) for Humber Doucy Lane (Policy ISPA4.1). We particularly welcome the references to the Council's Heritage Impact Assessment (HIA) and that proposals will have to demonstrate how the effects on heritage assets are taken into account and mitigated. We further support the reduction in site capacity from 496 to 449 dwellings.

SITE ALLOCATIONS AND POLICIES (INCORPORATING IP-ONE AREA ACTION PLAN) DEVELOPMENT PLAN DOCUMENT MAIN MODIFICATIONS

Again, we welcome the inclusion of the changes agreed through our Statement of Common Ground, October 2020 (Document I30.1). We particularly welcome the various revised policy wording and supporting text set out in Chapter 5 (Site Allocations and Policies) in relation to the historic environment within the IP-One Action Area. These modifications stipulate the approach to be followed with reference to both designated and non-designated heritage assets, making explicit where archaeological investigations and/or Heritage Impact Assessments will be required as part of the supporting evidence at the masterplanning/planning application stage. They also determine that the types and extent of archaeological remains will be a significant factor in informing the design, layout and construction methods of proposals. Historic England is satisfied that this additional work required can be undertaken prior to the determination of any planning application for these sites and will provide further feedback at the masterplanning and planning application stages of the development process.

We're also pleased to see the various references throughout the documents to the Council's substantial historic environment evidence-base, and Supplementary Planning Documents (SPDs). These include the Council's Conservation Area Character Appraisals for all the conservation areas including those within and adjacent to the IP-One Area, the Ipswich Urban Characterisation Study Supplementary



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

Planning Document (which cover parts of the town outside the conservation areas to explore the character and interest of these areas and provide design guidance to support the management of future development), an Urban Archaeological Database and Development and Archaeology Supplementary Planning Document.

Overall Historic England is content that the modifications will ensure that adequate protection is given to the historic environment in and around the IP-One Area and are consistent with national policy.

CONCLUSION

Finally, we should like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment.

If you have any questions with regards to the comments made, then please do get back to me. I would be very happy to meet to discuss these comments further. In the meantime, we look forward to continuing to work with you and your colleagues. I would be grateful if you could confirm receipt of this letter.

Yours sincerely,

Historic Environment Planning Adviser, Planning Group



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

From: Simrun Kaur/GBR
Sent: 23 September 2021 08:49
To: PlanningPolicy
Cc: GBR; Jeremy Smith/GBR
Subject: Ipswich Borough Council - IP245 - 12 -12a Arcade Street
Attachments: 20210820_093416.jpg

Importance: High

EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe.

Dear sir/madam,

By way of introduction I act on behalf of my client Her Majesty's Court and Tribunals Service (HMCTS) who occupy the building next door.

My client has brought to my attention the sign that has been installed on the post in front of the

building. Whilst we are writing on behalf of HMCTS I should just state that there are specific

stake holders within HMCTS such as the Judiciary who also have concerns about the

proposals. My client HMCTS does not intend to stand in the way of the concept and the general

improvements being proposed but rather express their concerns surrounding the development

that could potentially have a vital impact on them.

I understand a planning application has not been submitted so I would be grateful if we could

work collaboratively to address some concerns my client currently has surrounding the

development.

In summary, the initial key observations / concerns are as follows:

* As with any development/construction activity it will be produce noise, dust, vibration and other disturbances. This will have a vital impact on the courts as there can be no disruptions whilst hearings are ongoing.

* Construction deliveries, including plant ect, should not disrupt the court or access to it.

* During the construction phase there will need to be a pre-agreed time frames for noisy works to avoid disruption to court sittings.

* Please can you confirm if you intend to install windows on the side which overlooks the

courts? If so, my client has concerns it will overlook there hearing rooms.

I would be grateful if you could review the above and we can discuss how my client concerns

will be addressed?

I look forward to hear from you.

Please not I will be leaving C&W today but I have copied in my colleagues Nioka and Jeremy who will

take this forward...

Kind Regards
Simrun Kaur BSc (Hons) MRICS
Occupier Management
Birmingham

??Before printing, think about the environment

Cushman & Wakefield
1 Colmore Square, Birmingham, B4 6AJ, UK
Facebook I LinkedIn I Twitter I YouTube
I will be leaving the company on Thursday 23rd September, please direct any
future emails to *

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access.

Please see our website to view our privacy notice / statement.

Representations made in accordance with Regulation 22 - In Alphabetical Order

Full Redacted Representations

I

22 September 2021
Our Ref: 20.6006/Main Modifications 2021

15 De Grey Square
De Grey Road
Colchester
Essex
CO4 5YQ

Planning Policy
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE

T
F

Sent by email only to: planningpolicy@ipswich.gov.uk

Dear Sir/Madam,

Re: Main Modifications Consultation, Ipswich Borough Local Plan

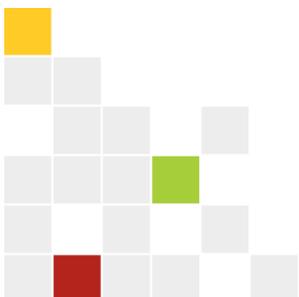
Ipswich School have actively and positively engaged in previous stages of the Local Plan production, including the Hearing Sessions which took place in November and December 2020 and wish to continue this involvement at the Main Modifications stage.

In its 600 year history, Ipswich School has been supported by local benefactors including Richard Felaw who in 1482 gave his house for education of boys in the town, but unlike many other private schools, Ipswich School does not have a major endowment and it therefore has to manage its assets carefully in order to be able to deliver its charitable objectives.

Ipswich School plays a major role in contributing to education in Suffolk and has a long-term strategy to open up access to the School to any worthy pupil, regardless of their ability to pay. The strategy addresses social mobility in the local community and opens pathways for deserving pupils. The School is also a significant employer in the town and provides a variety of opportunities both in terms of teaching and non-teaching roles.

The School also has significant land holdings within the Borough and is a member of the Ipswich Garden Suburb Delivery Board. Based on this history and involvement with the future of the Borough, the School has an interest in seeing the town develop as a quality environment to live and work. The aspirations of the Council as detailed within the Local Plan are welcomed and the School encourages the accelerated delivery of the Council's objectives in the coming years.

Based on this position, Ipswich School provides the comments outlined in the table below in respect of the Main Modifications identified within the consultation documents.



Main Modification	Section or Policy of the Local Plan	Comments on behalf of Ipswich School
MM28	Paragraph 8.58	<p>Ipswich School do not consider that the Council has “thoroughly reviewed the development potential within the Borough boundary” as outlined in the Main Modification to paragraph 8.58. Ipswich School continue to maintain their long-standing view that land at Tuddenham Road, which is currently identified for “Sport Uses” is not the most appropriate use of land, when it is recognised that housing land is limited within the Borough. Had the Council undertaken a “thorough” review of all development opportunities as part of the Strategic Housing and Economic Land Availability Assessment it would have identified the opportunity for development at Tuddenham Road. MM28 is not considered to be sound as it has not been positively prepared, it is not justified and will not be effective as this strategic matter has been deferred to a future plan review. To make the plan sound, Ipswich School request that the allocation for “Sport Uses” at Tuddenham Road is amended to allow for residential development on the site which will further assist with the School’s current facilities being relocated from Notcutts Field as part of a comprehensive programme of development over the plan period. The allocation of land at Tuddenham Road will also enable the Council to significantly boost housing supply across the Borough in accordance with the National Planning Policy Framework.</p>
MM36	Policy CS7	<p>Ipswich School supports the revisions to the housing requirement as outlined in Policy CS7. Ensuring that the Council plan for the appropriate number of dwellings is paramount and following the Government’s standard method to quantify local housing need is supported. Ipswich School welcome the increase of units to be planned for over the plan period. MM36 is considered to be legally compliant and sound.</p>
MM43	Policy CS10	<p>Ipswich School support the modification to the policy which requires development proposals to “have regard to the principles, objectives and vision of the adopted SPD.” Amending the policy wording</p>

		provides greater flexibility for landowners as they bring forward land within the IGS over the plan period. As a member of the IGS Delivery Board and a significant landowner within this strategic site, the modification is welcomed. MM43 is considered to be legally compliant and sound.
MM66	Policy CS17	Ipswich School support the modification to the policy in respect of reference to modal shift objectives within Policy CS17. Land at Notcutts Field, which is part of the Ipswich Garden Suburb, is well placed to contribute towards modal shift and the variety of sustainable transport improvements required over the plan period. MM66 is considered to be legally compliant and sound

On behalf of Ipswich School, we thank you for the opportunity to engage in the Main Modifications and continue to inform the stages of Local Plan production. We trust that the comments will be taken into account and should you have any further queries or need any further clarification or information then please feel free to contact me directly via the details below.

Yours sincerely,

Mark Edgerley
Associate Director

Tel:
Mob:
Email:

Boyer

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

J

This submission is **confirmed**

[26733]

Core Strategy and Polices Development Plan Document (DPD) Main Modifications

Object MM3 - Page 30, Paragraph 6.8

Respondent: [2597]

Received: **21/09/2021 via Web**

This wording is very non-committal, and unenforceable, using words such as “should” and “aim”. I believe the Council has a duty to be proactive on key issues such as Air Quality and Climate Change, however with such wording there is nothing to encourage development which will improve air quality and lessen the impact of climate change.

Changes to plan: I believe the Council should be using wording as follows: “5. AIR QUALITY AND CLIMATE CHANGE - Every development must contribute to the target of reducing Ipswich's carbon emissions below 2004 levels.’

Document is not legal

Document is not sound

This submission is **confirmed**

[26734]

Core Strategy and Polices Development Plan Document (DPD) Main Modifications

Object MM13 - Page 40, Paragraph 8.19

Respondent: [2597]

Received: **21/09/2021 via Web**

My Strong objection to this main modification is that by changing the wording so significantly it is trying to push through a policy to support the Council's development plans, for increased housing in the planned Ipswich Garden Suburb, rather than considering the realistic impacts that such a development will have on the road system in Ipswich.

Changes to plan: I don't believe that dismissing text relating to the Northern Bypass can be made so lightly, without a full impact assessment of what the impact of there no longer being a Northern Bypass has on the proposals for the Ipswich Garden Suburb. I don't believe the Ipswich Garden Suburb can realistically go ahead without the Bypass, without significant impact on roads and travel in Ipswich.

Document is not legal

Document is not sound

This submission is **confirmed**

[26735]

Core Strategy and Polices Development Plan Document (DPD) Main Modifications

Object MM14 - Page 40, Policy ISPA2

Respondent: [2597]

Received: **21/09/2021 via Web**

My Objection to this main modification is the same as for MM13 above.

Again, the Northern Bypass is struck out of the wording and disregarded, without consideration of the impacts this has on other parts of the Local Plan, especially the Ipswich Garden Suburb (CS10)

Changes to plan: The local plan must consider the impacts of the proposed Ipswich Garden Suburb now that the Northern Bypass is not going ahead. I believe this wording warrants a much deeper study and consultation on the impacts of the Ipswich Garden Suburb on the Ipswich road system, rather than a modification to some text in a policy.

Document is not legal

Document is not sound

[26736]

Core Strategy and Polices Development Plan Document (DPD) Main Modifications

Object MM23 - Page 44, Policy CS1

Respondent: [2597]

Received: **21/09/2021 via Web**

My objection to this wording is similar in nature to my objection of MM3.

The wording uses the term "should" when a more appropriate wording to ensure compliance with the policy, should be "must". It seems to me that anything related to tackling climate change is not worded strongly enough to enforce compliance with the policy. With tackling climate change, such a significant government objective must be more enforceable and correct wording of the Local Plan Policy can ensure this.

Changes to plan: The wording uses the term "should" when a more appropriate wording to ensure compliance with the policy, should be "must". It seems to me that anything related to tackling climate change is not worded strongly enough to enforce compliance with the policy. With tackling climate change, such a significant government objective must be more enforceable and correct wording of the Local Plan Policy can ensure this.

Document is not legal

Document is not sound

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

K

Ipswich Local Plan Main Modifications Consultation – Representations on behalf of Kesgrave Covenant Ltd to MM17 and MM18 (Policy ISPA 4 and supporting text relating to Humber Doucy Lane).

Introduction

Kesgrave Covenant has worked closely with Ipswich Borough Council in relation to the cross-border strategic allocation at Humber Doucy Lane, and as per our previous representations and our comments at the relevant Hearing session, Kesgrave Covenant generally support the allocation and the provisions of Policy ISPA 4.

Following the Hearing sessions, Kesgrave Covenant worked with the IBC, East Suffolk Council, and Suffolk County Council to agree a set of modifications to Policy ISPA 4 to address the matters raised at the Examination.

Unfortunately, the published Modifications (at MM17 and MM18) do not reflect the agreed position, specifically in relation to the matter of the capacity of the site.

Summary

We consider that the reduction in capacity from 496 units (489 when the site area is corrected to exclude the small parcel of 3rd party land on the south-west side of Humber Doucy Lane) is not justified and is not supported by any evidence presented to the Examination. There is no evidence to say that the Plan was unsound with the higher number as per the Submission draft, and therefore there is no need for any Modification to the site capacity.

Background

As originally submitted, Policy ISPA 4 itself did not give a figure for the capacity of the site, but the supporting text as paragraph 8.24 referred to an indicative development capacity of 496 homes (within the Ipswich boundary, so not including the part of the development that falls on the East Suffolk side).

The basis behind the 496 units can be found in the Site Sheet ISPA4.1 (originally included in the Site Allocations Plan), which noted that the site overall was 23.62 ha, and assuming only 60% of the site were developed, at 35 dwelling per hectare, this would provide 496 homes ($23.62 \times 0.6 \times 0.35 = 496$).

Main Modification MM17 notes that the area of the site is now 23.28 ha, and still states that 60% of the site is identified for housing. It states the remaining 40% is identified for "... secondary uses, comprising open space and other green and community infrastructure." However the site capacity is changed to be 449 units.

Whilst the original site capacity estimate was based on a clear formula (60% site coverage for housing at 35 dwelling per hectare), it will be immediately apparent that the figure of 449 homes has no such basis. A 60% site coverage for housing, at 35 dwellings per hectare, produces a figure for 489 homes based on the reduced site area of 23.28 ha, not 449 homes. There is nothing that explains where the figure of 449 comes from.

There was no debate at the Examination as to the appropriateness or otherwise of the assumption of 35 dwellings per hectare, and no evidence is before the Examination to suggest that the density figure is incorrect. In fact, Policy DM23 (as proposed to be Modified) says all development in Ipswich

must achieve “at least 35 dph” and therefore there is every possibility that, in due course, the density of the scheme might actually exceed 35 dph.

Therefore as written, with a 60% site coverage and an unchallenged density of 35 dph, Main Modification 17 (and MM18, which also includes the site yield) is clearly unjustified, because a 60% site coverage multiplied by 35 dph creates a yield of 489 homes.

Only if the assumption of 60% site coverage for residential is incorrect would it be possible to conclude that the site should have a lower yield of 449 homes.

As we go on to explore below, no party has actually objected to the figure of 60% site coverage, and no party has presented any specific evidence that challenges 60% site coverage. On that basis, we do not consider that there is any specific evidence before the Examination which would lead to a conclusion that 60% is unsound, or that would justify any other alternative figure.

We are of course aware that this matter has come about because of the Heritage Impact Assessment work, and therefore we turn to address this matter next.

The implications of the Heritage Impact Assessment

The original objection from Historic England that led to the supplemental Heritage Impact Assessment for Humber Doucy Land (representation 26658) is summarised within the SoCG signed between HE and IBC (Document I30). It will be seen that HE raised no objection to the 60% site coverage assumption. Rather, HE simply noted the heritage assets that exist in the vicinity, and stated that a Heritage Impact Assessment would be required.

The Heritage Impact Assessment was duly produced (document I30.3., John Selby, 25th September 2020). In our Hearing Statement, we identified a number of limitations to this document, being chiefly:

- (i) It is a high level assessment only, done in the absence of any specific scheme to assess;
- (ii) It’s findings seek to explore how development could occur “... without causing harm to the significance of heritage assets” (i.e. zero impact), whereas the actual test as per the NPPF is a balancing exercise between harm and public benefit (paras 196 and 197);
- (iii) It makes assumptions about the form of development that are incorrect.

In particular, we would refer the Inspectors to the wording at paragraph 4.1 of the HIA, which makes clear that the document is a high level HIA only, and its conclusions should be taken as such.

In relation to site yield, it will be noted that the HIA contains no specific commentary about the extent of developable area, and whilst it notes that the policy as drafted refers to 60% residential coverage (at paragraph 1.1), it does not seek to suggest that this figure is incorrect, and it does not suggest any alternative figure, either in terms of yield or development coverage.

As we explained in our Hearing Statement, our provisional Masterplanning work is already showing that there would be a high degree of correlation between where the 40% green infrastructure is likely to be provided, and where the main areas of sensitivity are as per the HIA.

The key point however is that the HIA itself does not provide any evidence to contradict the figure of 60% site coverage, nor does it seek to challenge that figure at any point.

The figure of 449 only materialises in Document I30.2 (an appendix to the HE SoCG), which contains a series of changes to the submitted Plan that IBC considered would be appropriate, and which include the suggested reduction in the capacity of the ISPA 4 site as a result of the HIA.

It is clear from IBC's response to comment 26658 in the HE SoCG that it was IBC's decision, based on the findings of the HIA, to suggest a reduction in the overall yield from the site from 496 dwellings to 449 (as opposed to be something requested by HE). However, as the rest of the text still refers to 60% coverage and 35 dph, there is nothing in Document I30.2 that explains where 449 came from.

So at this stage of the process, there is an objection from HE which only relates to the lack of an HIA (no objection to 60% coverage or the site yield), there is a high level HIA which raises no specific comment on the 60% site coverage or the yield, and there is a decision by IBC to make an adjustment to 449 units, but without any explanation for the basis of this calculation.

Following the close of the Hearing sessions, a period of joint working occurred between IBC, East Suffolk, SCC and Kesgrave Covenant to produce a set of agreed Modifications to Policy ISPA4.

The first draft of the suggested amendments produced by IBC, that were circulated to the above parties on 1st December 2020, included the suggested reduction to 449 units, as per the HE SoCG.

However, following further discussion between ourselves and IBC at the start of December 2020, IBC agreed that the 40% of site coverage set aside for "secondary uses" would indeed be likely to be sufficient to provide the mitigation required by the HIA, and therefore IBC agreed that there was no need to reduce the unit yield (other than obviously to reflect the exclusion of the small parcel of 3rd party land).

We attach a copy of final tracked version of the updated Site Sheet that was agreed between the parties on 11/12/2020, and which contains a very clear explanation in the row relating to Secondary Uses as to how the disposition of the 40% of secondary use space can be used to address the matters arising from the HIA.

Therefore the agreed version of the Modifications text sent to the Inspectors after the close of the Hearing that includes the figure of 489 is not an error, but rather it reflects a revised professional opinion by IBC (and by ourselves on behalf of Kesgrave Covenant) as to the reasonable expected yield from the site.

Moreover, it provides a figure that is mathematically correct and is supported by the continued assumption of 60% residential coverage with a density of (at least) 35 dph, as opposed to the figure of 449 which has no such sound basis.

Summary

In summary, therefore, the evidence before the Examination that relates to this matter is, we would suggest, as follows:

- An original objection by HE, but not to the 60% site coverage or yield, but to the lack of an HIA;
- An HIA that is self-admittedly high level only, that recognises that the policy is seeking to provide 60% residential site coverage, and which raises no specific comment on either the site coverage or the yield;
- An initial opinion by IBC, based on the HIA, that it should reduce the site yield to 449 units, but without any explanation as to where that figure comes from (and which in turn created a discrepancy as IBC have never revised their assumption on the 60% coverage or density);

- A subsequent opinion by IBC (following the Hearing sessions and following discussions with the site promoter as to how the 40% secondary uses element allows for the findings of the HIA to be properly taken in to account), to revert to a figure of 489 units (which is substantiated by being the sum of 60% site coverage multiplied by 35 dph).

Overall, therefore, we submit that:

- (a) There has never been any evidence before the Examination that would lead to a conclusion that either the 35 dph density or the 60% residential site coverage were unsound, and therefore there is no need for any Modification in this respect in the first place;
- (b) There has never been any objection from any party to either the 35 dph density or 60% residential site coverage;
- (c) The initial view of IBC to change the yield to 449 was never substantiated or explained, and in any event is superseded by the subsequent view of IBC, as set out in the agreed Modifications, to support the figure of 489 units.

For these reasons, MM17 (and MM18) are themselves unsound for the unjustified amendments to the site yield.

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
Document Main Modifications
Sustainability Appraisal of Main Modifications
Habitats Regulations Assessment of Main Modifications

Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

29th July 2021 (9.00am) – 23rd September 2021(11.45pm)

Consultation website: <https://ipswich.oc2.uk/>
Website: www.ipswich.gov.uk/mainmodifications
Email: planningpolicy@ipswich.gov.uk

Phone: 01473 432019

Council address:

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
Ipswich IP1 2DE



Please return to:	planningpolicy@ipswich.gov.uk Planning Policy Planning and Development Ipswich Borough Council Grafton House, 15-17 Russell Road Ipswich IP1 2DE
Return by:	23rd September 2021 11.45 pm
This form has two parts:	Part A – Personal details
	Part B – Your representation(s).

PART A Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title		
First name	Kesgrave Covenant Ltd	Kevin
Last name		Coleman
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		Phase 2 Planning and Development
Address <i>Please include post code</i>	C/o Agent	270 Avenue West Skyline 120 Great Notley Braintree Essex CM77 7AAk 17/09/21
E-mail		
Telephone No.		
<p>Signature:Date:</p> <p>Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details.</p> <p>* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.</p>		

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation <i>(and client if you are an agent):</i>	Phase 2 Planning & Development
--	--------------------------------

Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
MM17 (ISPA 4)	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	

5. Do you consider the proposed Main Modification is:

		Please tick		Please tick
5. (1) Legally compliant	Yes	Tick	No	
5. (2) Sound	Yes		No	Tick

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

- It would not be positively prepared**
- It would not be justified**
- It would not be effective**
- It would not be consistent with national policy**

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

Please see attached

(continue on a separate sheet / expand box if necessary)

Please provide a concise summary of your representation here (up to 100 words):

Please see attached

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

Please see attached

(continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.

Ipswich Local Plan Main Modifications Consultation – Representations on behalf of Kesgrave Covenant Ltd to MM17 and MM18 (Policy ISPA 4 and supporting text relating to Humber Doucy Lane).

Introduction

Kesgrave Covenant has worked closely with Ipswich Borough Council in relation to the cross-border strategic allocation at Humber Doucy Lane, and as per our previous representations and our comments at the relevant Hearing session, Kesgrave Covenant generally support the allocation and the provisions of Policy ISPA 4.

Following the Hearing sessions, Kesgrave Covenant worked with the IBC, East Suffolk Council, and Suffolk County Council to agree a set of modifications to Policy ISPA 4 to address the matters raised at the Examination.

Unfortunately, the published Modifications (at MM17 and MM18) do not reflect the agreed position, specifically in relation to the matter of the capacity of the site.

Summary

We consider that the reduction in capacity from 496 units (489 when the site area is corrected to exclude the small parcel of 3rd party land on the south-west side of Humber Doucy Lane) is not justified and is not supported by any evidence presented to the Examination. There is no evidence to say that the Plan was unsound with the higher number as per the Submission draft, and therefore there is no need for any Modification to the site capacity.

Background

As originally submitted, Policy ISPA 4 itself did not give a figure for the capacity of the site, but the supporting text as paragraph 8.24 referred to an indicative development capacity of 496 homes (within the Ipswich boundary, so not including the part of the development that falls on the East Suffolk side).

The basis behind the 496 units can be found in the Site Sheet ISPA4.1 (originally included in the Site Allocations Plan), which noted that the site overall was 23.62 ha, and assuming only 60% of the site were developed, at 35 dwelling per hectare, this would provide 496 homes ($23.62 \times 0.6 \times 0.35 = 496$).

Main Modification MM17 notes that the area of the site is now 23.28 ha, and still states that 60% of the site is identified for housing. It states the remaining 40% is identified for "... secondary uses, comprising open space and other green and community infrastructure." However the site capacity is changed to be 449 units.

Whilst the original site capacity estimate was based on a clear formula (60% site coverage for housing at 35 dwelling per hectare), it will be immediately apparent that the figure of 449 homes has no such basis. A 60% site coverage for housing, at 35 dwellings per hectare, produces a figure for 489 homes based on the reduced site area of 23.28 ha, not 449 homes. There is nothing that explains where the figure of 449 comes from.

There was no debate at the Examination as to the appropriateness or otherwise of the assumption of 35 dwellings per hectare, and no evidence is before the Examination to suggest that the density figure is incorrect. In fact, Policy DM23 (as proposed to be Modified) says all development in Ipswich

must achieve “at least 35 dph” and therefore there is every possibility that, in due course, the density of the scheme might actually exceed 35 dph.

Therefore as written, with a 60% site coverage and an unchallenged density of 35 dph, Main Modification 17 (and MM18, which also includes the site yield) is clearly unjustified, because a 60% site coverage multiplied by 35 dph creates a yield of 489 homes.

Only if the assumption of 60% site coverage for residential is incorrect would it be possible to conclude that the site should have a lower yield of 449 homes.

As we go on to explore below, no party has actually objected to the figure of 60% site coverage, and no party has presented any specific evidence that challenges 60% site coverage. On that basis, we do not consider that there is any specific evidence before the Examination which would lead to a conclusion that 60% is unsound, or that would justify any other alternative figure.

We are of course aware that this matter has come about because of the Heritage Impact Assessment work, and therefore we turn to address this matter next.

The implications of the Heritage Impact Assessment

The original objection from Historic England that led to the supplemental Heritage Impact Assessment for Humber Doucy Land (representation 26658) is summarised within the SoCG signed between HE and IBC (Document I30). It will be seen that HE raised no objection to the 60% site coverage assumption. Rather, HE simply noted the heritage assets that exist in the vicinity, and stated that a Heritage Impact Assessment would be required.

The Heritage Impact Assessment was duly produced (document I30.3., John Selby, 25th September 2020). In our Hearing Statement, we identified a number of limitations to this document, being chiefly:

- (i) It is a high level assessment only, done in the absence of any specific scheme to assess;
- (ii) It’s findings seek to explore how development could occur “... without causing harm to the significance of heritage assets” (i.e. zero impact), whereas the actual test as per the NPPF is a balancing exercise between harm and public benefit (paras 196 and 197);
- (iii) It makes assumptions about the form of development that are incorrect.

In particular, we would refer the Inspectors to the wording at paragraph 4.1 of the HIA, which makes clear that the document is a high level HIA only, and its conclusions should be taken as such.

In relation to site yield, it will be noted that the HIA contains no specific commentary about the extent of developable area, and whilst it notes that the policy as drafted refers to 60% residential coverage (at paragraph 1.1), it does not seek to suggest that this figure is incorrect, and it does not suggest any alternative figure, either in terms of yield or development coverage.

As we explained in our Hearing Statement, our provisional Masterplanning work is already showing that there would be a high degree of correlation between where the 40% green infrastructure is likely to be provided, and where the main areas of sensitivity are as per the HIA.

The key point however is that the HIA itself does not provide any evidence to contradict the figure of 60% site coverage, nor does it seek to challenge that figure at any point.

The figure of 449 only materialises in Document I30.2 (an appendix to the HE SoCG), which contains a series of changes to the submitted Plan that IBC considered would be appropriate, and which include the suggested reduction in the capacity of the ISPA 4 site as a result of the HIA.

It is clear from IBC's response to comment 26658 in the HE SoCG that it was IBC's decision, based on the findings of the HIA, to suggest a reduction in the overall yield from the site from 496 dwellings to 449 (as opposed to be something requested by HE). However, as the rest of the text still refers to 60% coverage and 35 dph, there is nothing in Document I30.2 that explains where 449 came from.

So at this stage of the process, there is an objection from HE which only relates to the lack of an HIA (no objection to 60% coverage or the site yield), there is a high level HIA which raises no specific comment on the 60% site coverage or the yield, and there is a decision by IBC to make an adjustment to 449 units, but without any explanation for the basis of this calculation.

Following the close of the Hearing sessions, a period of joint working occurred between IBC, East Suffolk, SCC and Kesgrave Covenant to produce a set of agreed Modifications to Policy ISPA4.

The first draft of the suggested amendments produced by IBC, that were circulated to the above parties on 1st December 2020, included the suggested reduction to 449 units, as per the HE SoCG.

However, following further discussion between ourselves and IBC at the start of December 2020, IBC agreed that the 40% of site coverage set aside for "secondary uses" would indeed be likely to be sufficient to provide the mitigation required by the HIA, and therefore IBC agreed that there was no need to reduce the unit yield (other than obviously to reflect the exclusion of the small parcel of 3rd party land).

We attach a copy of final tracked version of the updated Site Sheet that was agreed between the parties on 11/12/2020, and which contains a very clear explanation in the row relating to Secondary Uses as to how the disposition of the 40% of secondary use space can be used to address the matters arising from the HIA.

Therefore the agreed version of the Modifications text sent to the Inspectors after the close of the Hearing that includes the figure of 489 is not an error, but rather it reflects a revised professional opinion by IBC (and by ourselves on behalf of Kesgrave Covenant) as to the reasonable expected yield from the site.

Moreover, it provides a figure that is mathematically correct and is supported by the continued assumption of 60% residential coverage with a density of (at least) 35 dph, as opposed to the figure of 449 which has no such sound basis.

Summary

In summary, therefore, the evidence before the Examination that relates to this matter is, we would suggest, as follows:

- An original objection by HE, but not to the 60% site coverage or yield, but to the lack of an HIA;
- An HIA that is self-admittedly high level only, that recognises that the policy is seeking to provide 60% residential site coverage, and which raises no specific comment on either the site coverage or the yield;
- An initial opinion by IBC, based on the HIA, that it should reduce the site yield to 449 units, but without any explanation as to where that figure comes from (and which in turn created a discrepancy as IBC have never revised their assumption on the 60% coverage or density);

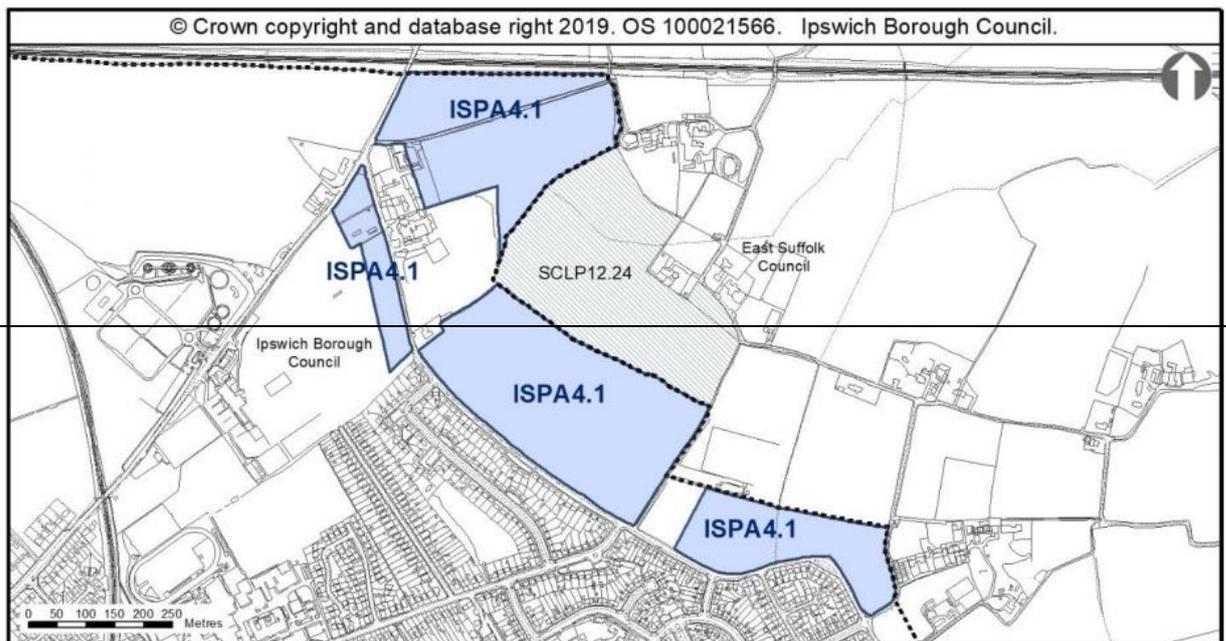
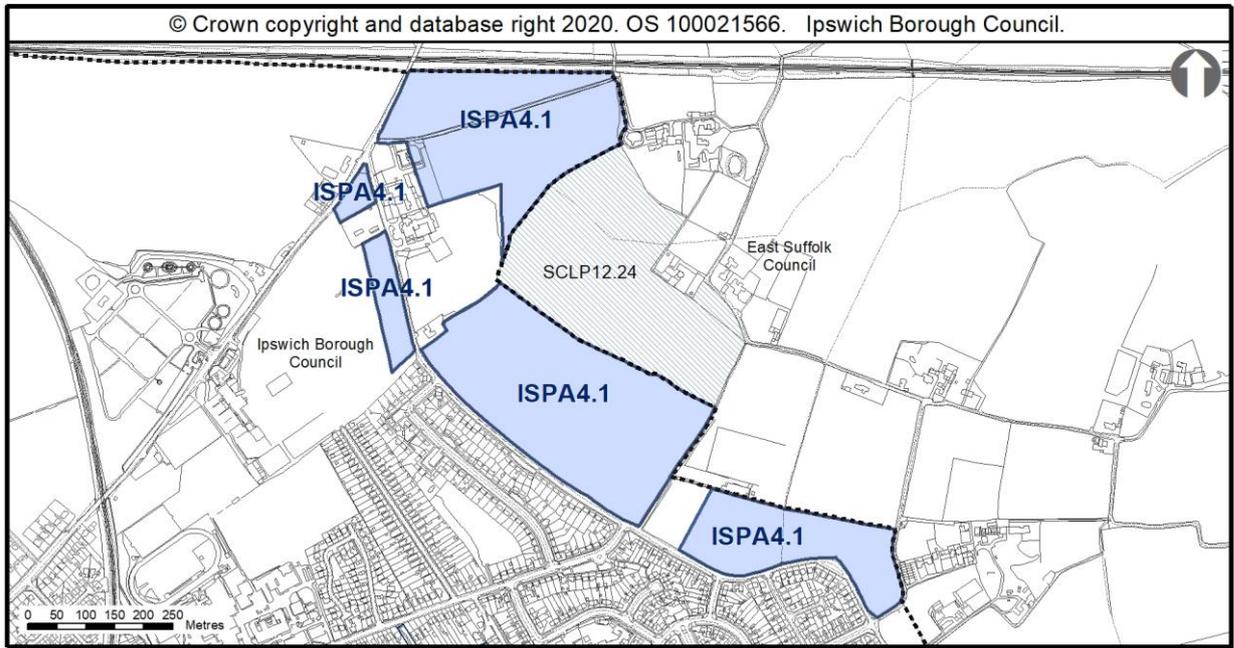
- A subsequent opinion by IBC (following the Hearing sessions and following discussions with the site promoter as to how the 40% secondary uses element allows for the findings of the HIA to be properly taken in to account), to revert to a figure of 489 units (which is substantiated by being the sum of 60% site coverage multiplied by 35 dph).

Overall, therefore, we submit that:

- (a) There has never been any evidence before the Examination that would lead to a conclusion that either the 35 dph density or the 60% residential site coverage were unsound, and therefore there is no need for any Modification in this respect in the first place;
- (b) There has never been any objection from any party to either the 35 dph density or 60% residential site coverage;
- (c) The initial view of IBC to change the yield to 449 was never substantiated or explained, and in any event is superseded by the subsequent view of IBC, as set out in the agreed Modifications, to support the figure of 489 units.

For these reasons, MM17 (and MM18) are themselves unsound for the unjustified amendments to the site yield.

Site Ref: ISPA 4.1 – Northern End of Humber Doucy Lane
Site Area: 23.28ha (within IBC Land)



Allocation Policy SP2 & ISPA4

Use(s)		Indicative capacity
Primary	Residential	496 489 (35dph on circa 60% of site)
Secondary	Green Rim Trail Highways Improvements Early Years Setting Sports Pitches Suitable Accessible Natural Green Space (SANGS) Associated Infrastructure	Approximately 40% of site <u>NB The 40% secondary uses primarily comprises open space and other green infrastructure. The disposition of these uses within the site at the Masterplan stage should take in to account the findings of the HIA and the green space used to help protect the setting of nearby heritage assets and provide a suitable transition between the urban and rural edge of Ipswich.</u>

Adopted Plan 2017

N/A – New Site. Previously allocated as Countryside.

Current use

Predominantly greenfield arable land.

Development constraints / issues

The principles and requirements set out in policy ISPA4 of the Core Strategy and Development Management Policies DPD must be followed.

The development of this land will need to be masterplanned along with the adjacent land allocated under the Suffolk Coastal Local Plan Review Policy SCLP12.24.

Development will need to be phased and delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure that there is sufficient primary school infrastructure capacity to meet demand.

An Early Years setting and replacement sports facilities, if needed, will need to be incorporated into any future development. Development will need to make appropriate provision towards primary school places which are likely to be accommodated within the three new primary schools planned through the Ipswich Garden Suburb.

The layout and design of any future development must incorporate the provision of a Green Trail walking and cycling route to help deliver the wider Green Trail around Ipswich. The provision of Suitable Accessible Natural Green Space and other forms of open space will be required in accordance with the Open Space Standards set out in Appendix 5 of the Core Strategy and Development Management Policies DPD. The disposition of open space should be used to assist in mitigating the impact of the development on local heritage assets.

A transport assessment and travel plan will be required to ensure that development contributes towards delivering a significant modal shift to sustainable transport modes, and that any localised highway improvements that may be required to Tuddenham Road or Humber Doucy Lane are identified and delivered, along with the provision of suitable crossing points. The junction between Tuddenham Road and Humber Doucy Lane will require improvement works to improve highway safety.

A high-quality of design will be required which also respects the countryside setting around the site. Biodiversity will need to be preserved and must incorporate net gain. The Ipswich Wildlife Audit 2019¹ provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless other means of biodiversity enhancement are appropriate. There are rows of Tree Preservation Orders (TPOs) along the boundary with Westerfield House that will need to be preserved unless there are overriding reasons for their removal. Where possible existing hedges onto Humber Doucy Lane shall be preserved and protected during the development process as applicable.

The setting of the grade II Listed Westerfield House Hotel must be preserved and enhanced as part of any future development of the site. The development should also seek to preserve the significance of the Listed Buildings to the north and east of the site. These are Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse. The development should also seek to minimise its impact on the non-designated heritage assets identified by the strategic Heritage Impact Assessment.

¹ See Wildlife Audit Site Sheets for IP184a, IP184c, IP303, IP309, IP344 and IP350

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
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Sustainability Appraisal of Main Modifications
Habitats Regulations Assessment of Main Modifications

Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

29th July 2021 (9.00am) – 23rd September 2021(11.45pm)

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Phone: 01473 432019

Council address:

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
Ipswich IP1 2DE



Please return to:	planningpolicy@ipswich.gov.uk Planning Policy Planning and Development Ipswich Borough Council Grafton House, 15-17 Russell Road Ipswich IP1 2DE
Return by:	23rd September 2021 11.45 pm
This form has two parts:	Part A – Personal details
	Part B – Your representation(s).

PART A Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title		
First name		Kevin
Last name		Coleman
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>	Kesgrave Covenant Ltd	Phase 2 Planning and Development
Address <i>Please include post code</i>		270 Avenue West Skyline 120 Great Notley Braintree Essex CM77 7AA
E-mail		
Telephone No.		
17/09/21		
Signature:		
Date:		
Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details.		
* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.		

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation <i>(and client if you are an agent):</i>	Phase 2 Planning & Development
--	--------------------------------

Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
MM18 (ISPA 4)	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	

5. Do you consider the proposed Main Modification is:

		Please tick		Please tick
5. (1) Legally compliant	Yes	Tick	No	
5. (2) Sound	Yes		No	Tick

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

- It would not be positively prepared**
- It would not be justified**
- It would not be effective**
- It would not be consistent with national policy**

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

Please see attached

(continue on a separate sheet / expand box if necessary)

Please provide a concise summary of your representation here (up to 100 words):

Please see attached

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

Please see attached

(continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.

Ipswich Local Plan Main Modifications Consultation – Representations on behalf of Kesgrave Covenant Ltd to MM17 and MM18 (Policy ISPA 4 and supporting text relating to Humber Doucy Lane).

Introduction

Kesgrave Covenant has worked closely with Ipswich Borough Council in relation to the cross-border strategic allocation at Humber Doucy Lane, and as per our previous representations and our comments at the relevant Hearing session, Kesgrave Covenant generally support the allocation and the provisions of Policy ISPA 4.

Following the Hearing sessions, Kesgrave Covenant worked with the IBC, East Suffolk Council, and Suffolk County Council to agree a set of modifications to Policy ISPA 4 to address the matters raised at the Examination.

Unfortunately, the published Modifications (at MM17 and MM18) do not reflect the agreed position, specifically in relation to the matter of the capacity of the site.

Summary

We consider that the reduction in capacity from 496 units (489 when the site area is corrected to exclude the small parcel of 3rd party land on the south-west side of Humber Doucy Lane) is not justified and is not supported by any evidence presented to the Examination. There is no evidence to say that the Plan was unsound with the higher number as per the Submission draft, and therefore there is no need for any Modification to the site capacity.

Background

As originally submitted, Policy ISPA 4 itself did not give a figure for the capacity of the site, but the supporting text as paragraph 8.24 referred to an indicative development capacity of 496 homes (within the Ipswich boundary, so not including the part of the development that falls on the East Suffolk side).

The basis behind the 496 units can be found in the Site Sheet ISPA4.1 (originally included in the Site Allocations Plan), which noted that the site overall was 23.62 ha, and assuming only 60% of the site were developed, at 35 dwelling per hectare, this would provide 496 homes ($23.62 \times 0.6 \times 0.35 = 496$).

Main Modification MM17 notes that the area of the site is now 23.28 ha, and still states that 60% of the site is identified for housing. It states the remaining 40% is identified for "... secondary uses, comprising open space and other green and community infrastructure." However the site capacity is changed to be 449 units.

Whilst the original site capacity estimate was based on a clear formula (60% site coverage for housing at 35 dwelling per hectare), it will be immediately apparent that the figure of 449 homes has no such basis. A 60% site coverage for housing, at 35 dwellings per hectare, produces a figure for 489 homes based on the reduced site area of 23.28 ha, not 449 homes. There is nothing that explains where the figure of 449 comes from.

There was no debate at the Examination as to the appropriateness or otherwise of the assumption of 35 dwellings per hectare, and no evidence is before the Examination to suggest that the density figure is incorrect. In fact, Policy DM23 (as proposed to be Modified) says all development in Ipswich

must achieve “at least 35 dph” and therefore there is every possibility that, in due course, the density of the scheme might actually exceed 35 dph.

Therefore as written, with a 60% site coverage and an unchallenged density of 35 dph, Main Modification 17 (and MM18, which also includes the site yield) is clearly unjustified, because a 60% site coverage multiplied by 35 dph creates a yield of 489 homes.

Only if the assumption of 60% site coverage for residential is incorrect would it be possible to conclude that the site should have a lower yield of 449 homes.

As we go on to explore below, no party has actually objected to the figure of 60% site coverage, and no party has presented any specific evidence that challenges 60% site coverage. On that basis, we do not consider that there is any specific evidence before the Examination which would lead to a conclusion that 60% is unsound, or that would justify any other alternative figure.

We are of course aware that this matter has come about because of the Heritage Impact Assessment work, and therefore we turn to address this matter next.

The implications of the Heritage Impact Assessment

The original objection from Historic England that led to the supplemental Heritage Impact Assessment for Humber Doucy Land (representation 26658) is summarised within the SoCG signed between HE and IBC (Document I30). It will be seen that HE raised no objection to the 60% site coverage assumption. Rather, HE simply noted the heritage assets that exist in the vicinity, and stated that a Heritage Impact Assessment would be required.

The Heritage Impact Assessment was duly produced (document I30.3., John Selby, 25th September 2020). In our Hearing Statement, we identified a number of limitations to this document, being chiefly:

- (i) It is a high level assessment only, done in the absence of any specific scheme to assess;
- (ii) It’s findings seek to explore how development could occur “... without causing harm to the significance of heritage assets” (i.e. zero impact), whereas the actual test as per the NPPF is a balancing exercise between harm and public benefit (paras 196 and 197);
- (iii) It makes assumptions about the form of development that are incorrect.

In particular, we would refer the Inspectors to the wording at paragraph 4.1 of the HIA, which makes clear that the document is a high level HIA only, and its conclusions should be taken as such.

In relation to site yield, it will be noted that the HIA contains no specific commentary about the extent of developable area, and whilst it notes that the policy as drafted refers to 60% residential coverage (at paragraph 1.1), it does not seek to suggest that this figure is incorrect, and it does not suggest any alternative figure, either in terms of yield or development coverage.

As we explained in our Hearing Statement, our provisional Masterplanning work is already showing that there would be a high degree of correlation between where the 40% green infrastructure is likely to be provided, and where the main areas of sensitivity are as per the HIA.

The key point however is that the HIA itself does not provide any evidence to contradict the figure of 60% site coverage, nor does it seek to challenge that figure at any point.

The figure of 449 only materialises in Document I30.2 (an appendix to the HE SoCG), which contains a series of changes to the submitted Plan that IBC considered would be appropriate, and which include the suggested reduction in the capacity of the ISPA 4 site as a result of the HIA.

It is clear from IBC's response to comment 26658 in the HE SoCG that it was IBC's decision, based on the findings of the HIA, to suggest a reduction in the overall yield from the site from 496 dwellings to 449 (as opposed to be something requested by HE). However, as the rest of the text still refers to 60% coverage and 35 dph, there is nothing in Document I30.2 that explains where 449 came from.

So at this stage of the process, there is an objection from HE which only relates to the lack of an HIA (no objection to 60% coverage or the site yield), there is a high level HIA which raises no specific comment on the 60% site coverage or the yield, and there is a decision by IBC to make an adjustment to 449 units, but without any explanation for the basis of this calculation.

Following the close of the Hearing sessions, a period of joint working occurred between IBC, East Suffolk, SCC and Kesgrave Covenant to produce a set of agreed Modifications to Policy ISPA4.

The first draft of the suggested amendments produced by IBC, that were circulated to the above parties on 1st December 2020, included the suggested reduction to 449 units, as per the HE SoCG.

However, following further discussion between ourselves and IBC at the start of December 2020, IBC agreed that the 40% of site coverage set aside for "secondary uses" would indeed be likely to be sufficient to provide the mitigation required by the HIA, and therefore IBC agreed that there was no need to reduce the unit yield (other than obviously to reflect the exclusion of the small parcel of 3rd party land).

We attach a copy of final tracked version of the updated Site Sheet that was agreed between the parties on 11/12/2020, and which contains a very clear explanation in the row relating to Secondary Uses as to how the disposition of the 40% of secondary use space can be used to address the matters arising from the HIA.

Therefore the agreed version of the Modifications text sent to the Inspectors after the close of the Hearing that includes the figure of 489 is not an error, but rather it reflects a revised professional opinion by IBC (and by ourselves on behalf of Kesgrave Covenant) as to the reasonable expected yield from the site.

Moreover, it provides a figure that is mathematically correct and is supported by the continued assumption of 60% residential coverage with a density of (at least) 35 dph, as opposed to the figure of 449 which has no such sound basis.

Summary

In summary, therefore, the evidence before the Examination that relates to this matter is, we would suggest, as follows:

- An original objection by HE, but not to the 60% site coverage or yield, but to the lack of an HIA;
- An HIA that is self-admittedly high level only, that recognises that the policy is seeking to provide 60% residential site coverage, and which raises no specific comment on either the site coverage or the yield;
- An initial opinion by IBC, based on the HIA, that it should reduce the site yield to 449 units, but without any explanation as to where that figure comes from (and which in turn created a discrepancy as IBC have never revised their assumption on the 60% coverage or density);

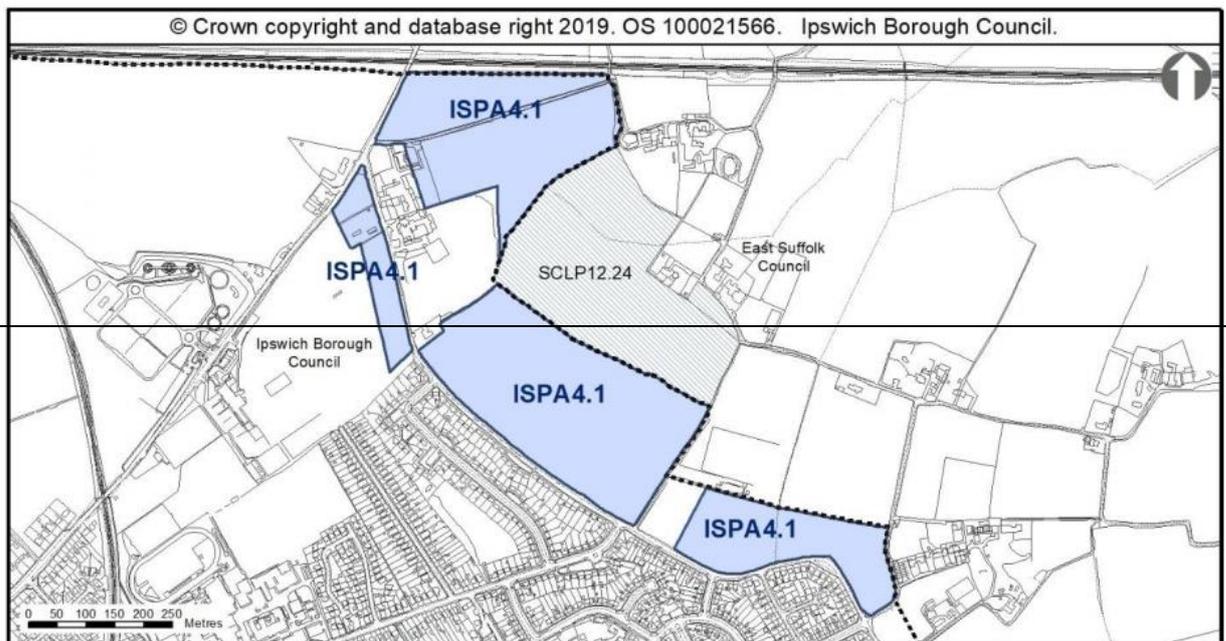
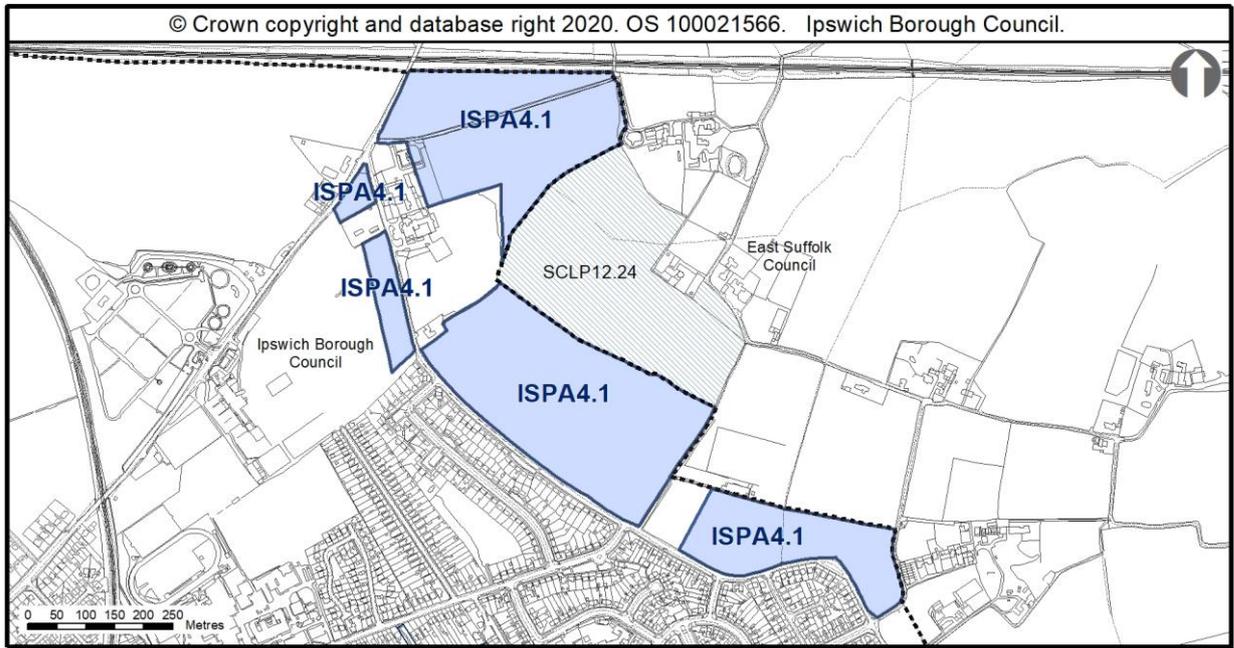
- A subsequent opinion by IBC (following the Hearing sessions and following discussions with the site promoter as to how the 40% secondary uses element allows for the findings of the HIA to be properly taken in to account), to revert to a figure of 489 units (which is substantiated by being the sum of 60% site coverage multiplied by 35 dph).

Overall, therefore, we submit that:

- (a) There has never been any evidence before the Examination that would lead to a conclusion that either the 35 dph density or the 60% residential site coverage were unsound, and therefore there is no need for any Modification in this respect in the first place;
- (b) There has never been any objection from any party to either the 35 dph density or 60% residential site coverage;
- (c) The initial view of IBC to change the yield to 449 was never substantiated or explained, and in any event is superseded by the subsequent view of IBC, as set out in the agreed Modifications, to support the figure of 489 units.

For these reasons, MM17 (and MM18) are themselves unsound for the unjustified amendments to the site yield.

Site Ref: ISPA 4.1 – Northern End of Humber Doucy Lane
Site Area: 23.28ha (within IBC Land)



Allocation Policy SP2 & ISPA4

Use(s)		Indicative capacity
Primary	Residential	496 489 (35dph on circa 60% of site)
Secondary	Green Rim Trail Highways Improvements Early Years Setting Sports Pitches Suitable Accessible Natural Green Space (SANGS) Associated Infrastructure	Approximately 40% of site <u>NB The 40% secondary uses primarily comprises open space and other green infrastructure. The disposition of these uses within the site at the Masterplan stage should take in to account the findings of the HIA and the green space used to help protect the setting of nearby heritage assets and provide a suitable transition between the urban and rural edge of Ipswich.</u>

Adopted Plan 2017

N/A – New Site. Previously allocated as Countryside.

Current use

Predominantly greenfield arable land.

Development constraints / issues

The principles and requirements set out in policy ISPA4 of the Core Strategy and Development Management Policies DPD must be followed.

The development of this land will need to be masterplanned along with the adjacent land allocated under the Suffolk Coastal Local Plan Review Policy SCLP12.24.

Development will need to be phased and delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure that there is sufficient primary school infrastructure capacity to meet demand.

An Early Years setting and replacement sports facilities, if needed, will need to be incorporated into any future development. Development will need to make appropriate provision towards primary school places which are likely to be accommodated within the three new primary schools planned through the Ipswich Garden Suburb.

The layout and design of any future development must incorporate the provision of a Green Trail walking and cycling route to help deliver the wider Green Trail around Ipswich. The provision of Suitable Accessible Natural Green Space and other forms of open space will be required in accordance with the Open Space Standards set out in Appendix 5 of the Core Strategy and Development Management Policies DPD. The disposition of open space should be used to assist in mitigating the impact of the development on local heritage assets.

A transport assessment and travel plan will be required to ensure that development contributes towards delivering a significant modal shift to sustainable transport modes, and that any localised highway improvements that may be required to Tuddenham Road or Humber Doucy Lane are identified and delivered, along with the provision of suitable crossing points. The junction between Tuddenham Road and Humber Doucy Lane will require improvement works to improve highway safety.

A high-quality of design will be required which also respects the countryside setting around the site. Biodiversity will need to be preserved and must incorporate net gain. The Ipswich Wildlife Audit 2019¹ provides further information on ecological surveys that will be required, as well as recommendations for how biodiversity net gain can be incorporated into new development, unless other means of biodiversity enhancement are appropriate. There are rows of Tree Preservation Orders (TPOs) along the boundary with Westerfield House that will need to be preserved unless there are overriding reasons for their removal. Where possible existing hedges onto Humber Doucy Lane shall be preserved and protected during the development process as applicable.

The setting of the grade II Listed Westerfield House Hotel must be preserved and enhanced as part of any future development of the site. The development should also seek to preserve the significance of the Listed Buildings to the north and east of the site. These are Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse. The development should also seek to minimise its impact on the non-designated heritage assets identified by the strategic Heritage Impact Assessment.

¹ See Wildlife Audit Site Sheets for IP184a, IP184c, IP303, IP309, IP344 and IP350

1st August 2021

Dear

Thank you for the Notice of Consultation – Ipswich Plan Review 2018 – 2036.
I followed the Planning Decisions on the Prince of Wales Drive – Co-op site and proposed future build.

I felt sorry for the residents who had moved into the housing properties alongside the Co-op and also the residents of Chatsworth Crescent properties that would back onto the proposed building site.

There was no public consultation concerning the proposed new buildings and the outline aim went against the original proposals for Stoke Park Estate which asked for open views of the surrounding countryside.

A lady at the Council meeting stated that Stoke Park had sufficient shops. We had a delightful range of shops (about 20 in total) a garage and a public house which were all demolished and replaced by a third rate superstore which was in the middle of the estate.

The Co-op bought the land for a low price. The Council decision to allow the building of ASDA meant the Co-op could not compete. The two shops adjacent to the Co-op were given notice even though they were both flourishing and were put up for sale.

There were offers made to the Co-op by other businesses but these were turned down. The Co-op applied for change of use of land and stand to make a lot of money because of that.

When ASDA was built a big area alongside the supermarket was left and has become derelict and would have made a good site for the development now scheduled for the empty Co-op property. This area needs more shops. Maidenhall estate only has two shops for the entire estate.

The proposals are situated at a bottle knock on Prince of Wales Drive opposite a very busy Primary School and an Old People's Home. Removing the parking facilities which are used by all will just add to the frustrations already felt by parents and neighbours alike.

I wish to state that I do not want to be involved in any way with the Ipswich Local Plan Review. I was brought up in Ipswich when it was a pleasant market town and not the awful dump it has become.

Yours faithfully

Representations made in accordance with Regulation 22 - In Alphabetical Order

Full Redacted Representations

L

This submission is **confirmed**

[26732]

Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document (DPD) Main Modifications

Object MM175 - Page 30, Policy SP3

 [Has attachments](#)

Respondent:

[2596]

Received: **21/09/2021 via Web**

The plan for IP131 - Milton Street is not consistent with the current HM Land Registry document, title number SK205843. The land registry shows the parking space behind 49 and 51 Milton Street as part of the title for 51 Milton Street, but the proposed plan omits this fact, and includes the parking space as part of the development site, which it is not.

Also, I am the tenant of (since February 2000) and I have not received the paper copy of the proposed development, I am working from the notice attached to the lamppost only.

Changes to plan: Plan should not include the parking space behind 51 and 49 Milton Street. Plan should be changed to agree with the current HM Land Registry in this respect. Notification of affected residents was not complete. I would also like to see evidence that drainage impact has also been considered by the plan.

Document is not legal

Document is not sound

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

M



Ipswich Borough Council,
Grafton House,
15-17 Russell Road,
Ipswich
IP1 2DE

Our ref: ID 239

23/08/21

Dear Sir/Madam,

MMO Marine Planning and Marine Licensing response to Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review, Final Draft with Proposed Main Modifications

Thank you for giving us the opportunity to comment on the Local Plan. The comments provided within this letter refer to the document entitled Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review, Final Draft with Proposed Main Modifications.

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the [South East Marine Plan](#) is of relevance. The draft plan was published for public consultation on 14th January 2020, at which point it became material for consideration. The South East Marine Plan was adopted June 2021, alongside the North East, North West, and South West. The South East Marine Plans cover the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the [South East Marine Plan](#), or the [UK Marine Policy Statement](#) (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#), [Explore Marine Plans](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

Marine Licensing

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the [UK marine area](#).

The MMO is responsible for [marine licensing](#) in English waters and for Northern Ireland offshore waters.

The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

Summary notes

Please see below suggested policies from the South East Inshore Marine Plans that we feel are most relevant to your local plan.

These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plans is completed:

- **SE-INF-1:** Proposals for appropriate marine infrastructure which facilitates land-based activities, or land-based infrastructure which facilitates marine activities (including the diversification or regeneration of sustainable marine industries), should be supported.
- **SE-INF-2:** (1) Proposals for alternative development at existing safeguarded landing facilities will not be supported.
(2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities.
(3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport.
(4) Proposals adjacent and opposite existing landing facilities (excluding safeguarded sites) that may have significant adverse impacts on the landing facilities should demonstrate that they will, in order of preference:
 - a) avoid

- b) minimise
- c) mitigate - adverse impacts so they are no longer significant.
- **SE-CO-1:** Proposals that optimise the use of space and incorporate opportunities for co-existence and co-operation with existing activities will be supported. Proposals that may have significant adverse impacts on, or displace, existing activities must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - adverse impacts so they are no longer significant.
 If it is not possible to mitigate significant adverse impacts, proposals must state the case for proceeding.
- **SE-HER-1:** Proposals that demonstrate they will conserve and enhance the significance of heritage assets will be supported. Where proposals may cause harm to the significance of heritage assets, proponents must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - any harm to the significance of heritage assets.
 If it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets.
- **SE-EMP-1:** Proposals that result in a net increase in marine-related employment will be supported, particularly where they meet one or more of the following:
 - 1) are aligned with local skills strategies and support the skills available
 - 2) create a diversity of opportunities
 - 3) create employment in locations identified as the most deprived
 - 4) implement new technologies - in, and adjacent to, the south east marine plan area.
- **SE-CC-1:** Proposals that conserve, restore or enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - adverse impacts so they are no longer significant
 d) compensate for significant adverse impacts that cannot be mitigated
- **SE-CC-2:** Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change.

- **SE-CC-3:** Proposals in the south east marine plan area, and adjacent marine plan areas, that are likely to have significant adverse impacts on coastal change, or on climate change adaptation measures inside and outside of the proposed project areas, should only be supported if they can demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - adverse impacts so they are no longer significant
- **SE-AIR-1:** Proposals must assess their direct and indirect impacts upon local air quality and emissions of greenhouse gases. Proposals that are likely to result in increased air pollution or increased emissions of greenhouse gases must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - air pollution and/or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements.
- **SE-ML-1:** Public authorities must make adequate provision for the prevention, re-use, recycling and disposal of waste to reduce and prevent marine litter. Public authorities should aspire to undertake measures to remove marine litter within their jurisdiction.
- **SE-ML-2:** Proposals that facilitate waste re-use or recycling to reduce or remove marine litter will be supported. Proposals that could potentially increase the amount of marine litter in the marine plan area must include measures to, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - waste entering the marine environment.
- **SE-WQ-1:** Proposals that protect, enhance and restore water quality will be supported. Proposals that cause deterioration of water quality must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - deterioration of water quality in the marine environment
- **SE-ACC-1:** Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, including the provision of services for tourism and recreation activities, will be supported. Proposals that may have significant adverse impacts on public access should demonstrate that they will, in order of preference:

- a) avoid
- b) minimise
- c) mitigate
- adverse impacts so they are no longer significant.
- **SE-TR-1:** Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported.
Proposals that may have significant adverse impacts on tourism and recreation activities must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - adverse impacts so they are no longer significant.
- **SE-MPA-1:** Proposals that support the objectives of marine protected areas and the ecological coherence of the marine protected area network will be supported.
Proposals that may have adverse impacts on the objectives of marine protected areas must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - adverse impacts, with due regard given to statutory advice on an ecologically coherent network.
- **SE-MPA-2:**
Proposals that enhance a marine protected area's ability to adapt to climate change, enhancing the resilience of the marine protected area network, will be supported.
Proposals that may have adverse impacts on an individual marine protected area's ability to adapt to the effects of climate change, and so reduce the resilience of the marine protected area network, must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - adverse impacts.
- **SE-MPA-3:** Where statutory advice states that a marine protected area site condition is deteriorating or that features are moving or changing due to climate change, a suitable boundary change to ensure continued protection of the site and coherence of the overall network should be considered.
- **SE-MPA-4:** Proposals that may have significant adverse impacts on designated geodiversity must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate

- adverse impacts so they are no longer significant.
- **SE-BIO-1:** Proposals that enhance the distribution of priority habitats and priority species will be supported.
Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - adverse impacts so they are no longer significant
 - d) compensate for significant adverse impacts that cannot be mitigated.
- **SE-BIO-2:** Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration, will be supported.
Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration, must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate - adverse impacts so they are no longer significant
 - d) compensate for significant adverse impacts that cannot be mitigated
- **SE-BIO-3:** Proposals that conserve, restore or enhance coastal habitats, where important in their own right and/or for ecosystem functioning and provision of ecosystem services, will be supported.
Proposals must take account of the space required for coastal habitats, where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - d) compensate for - net habitat loss.
- **SE-DIST-1:** Proposals that may have significant adverse impacts on highly mobile species through disturbance or displacement must demonstrate that they will, in order of preference:
 - a) avoid
 - b) minimise
 - c) mitigate
 - adverse impacts so they are no longer significant.

Further points to note

Page 60: Section 8.78: You refer to the South East marine plan “*The South East Marine Plan which covers an area from Landguard Point in Felixstowe to Samphire Hoe near Dover was published for public consultation in January 2020 and is therefore also a*

material consideration". The [South East Marine Plan](#) was adopted this year and is no longer material for consideration but has the full weight of an adopted plan.

The [East Inshore and East Offshore Marine Plans](#) were adopted in 2014, and the [South Inshore and Offshore Marine Plan](#) was adopted in 2018, which cover the adjacent areas. Please ensure correct reference to the South East, South, and East marine plan areas where included.

A South East Marine Plan Implementation Training session in March 2021. This provided an introduction to marine planning, and I would suggest re-visiting the material in our recorded [webinar](#) which supported the Consultation of the South East Marine Plan. Please let me know if you have any questions regarding implementation of the marine plan.

As previously stated, these are recommendations and we suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information:
[South East Marine Plan](#) and [Explore Marine Plans](#).

Yours sincerely,

Marine Planning Officer (South East)

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
Document Main Modifications
Sustainability Appraisal of Main Modifications
Habitats Regulations Assessment of Main Modifications

Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

29th July 2021 (9.00am) – 23rd September 2021(11.45pm)

Consultation website: <https://ipswich.oc2.uk/>
Website: www.ipswich.gov.uk/mainmodifications
Email: planningpolicy@ipswich.gov.uk

Phone: 01473 432019

Council address:

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
Ipswich IP1 2DE



Please return to:	planningpolicy@ipswich.gov.uk Planning Policy Planning and Development Ipswich Borough Council Grafton House, 15-17 Russell Road Ipswich IP1 2DE
Return by:	23rd September 2021 11.45 pm
This form has two parts:	Part A – Personal details
	Part B – Your representation(s).

PART A Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title		
First name		Kevin
Last name		Coleman
Job title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>	Mersea Homes Ltd	Phase 2 Planning and Development
Address <i>Please include post code</i>	C/o Agent	270 Avenue West Skyline 120 Great Notley Braintree Essex CM77 7AAk
E-mail		
Telephone No.		
<p>Signature: K Coleman Date: 09/09/21</p> <p>Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details.</p> <p>* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.</p>		

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation <i>(and client if you are an agent):</i>	Phase 2 Planning & Development
--	--------------------------------

Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
MM43 (Policy CS10)	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	K22

5. Do you consider the proposed Main Modification is:

		Please tick		Please tick
5. (1) Legally compliant	Yes	Tick	No	
5. (2) Sound	Yes		No	Tick

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

- It would not be positively prepared**
- It would not be justified**
- It would not be effective**
- It would not be consistent with national policy**

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

Please see attached

(continue on a separate sheet / expand box if necessary)

Please provide a concise summary of your representation here (up to 100 words):

Please see attached

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

Please see attached

(continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.

Ipswich Local Plan Main Modifications Consultation – Representations on behalf of Mersea Homes Ltd to MM43 for Policy CS10 (Ipswich Garden Suburb).

Summary

In relation to the affordable housing requirement of 31% in Policy CS10, the Council's further written statement as per K22 seeks to explain why it considers it can rely on the Aspinal Verdi Whole Plan Viability Assessment as evidence to support that provision. We explain why, with cross reference to our original submissions, the Aspinal Verdi appraisal is flawed, and therefore cannot be relied, and in the absence of any other evidential base to support 31%, the Plan is unsound.

We also explain, again in response to K22, why in the absence of any Modification, the viability review mechanism text is unsound.

Introduction

In our original representations to the Submission Draft Plan, we raised three objections in relation to the submitted wording of Policy CS10, as follows:

1. The wording of the policy in relation to site specific matters and the role of the SPD;
2. The Affordable Housing provisions;
3. The wording of the Policy in respect of viability review provisions.

In relation to the first matter above, we support the changes that have been made to Policy CS10 in MM43 which provide greater clarity now on the function of the SPD, and these changes resolve our original objections.

In relation to the 2nd and 3rd matters however, we note that new document K22 contains a further explanation from the Council in which it seeks to provide additional evidence as to why, in their view, Modifications to the policy are not required to address the matters raised at the Hearing and in our original representations. For the reasons explained below, the further material produced as document K22 fails to provide the necessary justification for not amending the Policy, and therefore the absence of Modifications on these matters continues to render the Plan unsound.

These objections also cover a fourth matter, which relates to the revisions proposed to the uses allowed in the Local Centres. We understand that the Council has sought to update the Plan in relation to the new Use Classes order, but the revisions made are not in our view Justified as they unreasonably preclude certain uses that the submitted version of the Plan would have allowed.

The Affordable Housing Provisions

The substance of IBC's response on this matter, as set out in K22, is that the Whole Plan Viability Assessment produced by Aspinal Verdi is sound (see the paragraphs at the bottom of page 2 of K22).

However, nowhere in the Council's response in K22, and at no point during the Hearing session, were either the Council or Aspinal Verdi able to explain why the infrastructure costs assumed by Aspinal Verdi for the Ipswich Garden Suburb (£79,000 per acre) bore no relationship whatsoever to the actual infrastructure costs that were agreed as part of the two site specific viability appraisals for Henley Gate and Fonnereau (£420,000 per acre)¹.

¹ For ease of reference, we attach our original Reg 19 representation with the relevant paragraphs highlighted.

On page 3 of K22 the Council seeks to explain how different assumptions in appraisals can produce different results. That is of course the case. And the point is amply proved by the Whole Plan Viability Appraisal, in the sense that it's hardly surprising that, if one assumes an infrastructure cost of £79,000 per acre, rather than using the agreed figure of £420,000, it's possible to make it look like a development is viable at 31% affordable housing, even when it is patently not the case in practice, as the two detailed site specific appraisals have shown.

That is not to say that the Whole Plan Viability Appraisal is unsuitable in relation to the Plan as a whole. We have no evidence to suggest that for generic sites elsewhere in the Plan area it is not producing the right result. But clearly where there are detailed appraisals that have been prepared for the actual development site in question, that have been through a due process of peer review and testing, and which are agreed between the developers and the Council, these have to be afforded greater weight than a generic Whole Plan assessment that has not.

In relation to the Ipswich Garden Suburb, the assumption of £79,000 per acre is demonstrably wrong – firstly, because it fails to correlate with the site specific appraisals referred to, but also because the list of infrastructure allowed for in the Whole Plan Viability Assessment and which led to the figure of £79,000 is clearly well short of the actual infrastructure requirements of a major new community. It is obvious that the four items of infrastructure listed in the Whole Plan Viability Assessment are just generic items applicable to essentially any development, and do not take in to account the full infrastructure costs.²

At the Hearing and in correspondence subsequently, the issue of whether it is mathematically possible to deliver 31% affordable housing has been discussed, and remains a point of disagreement between ourselves and IBC. But frankly, whether or not it is mathematically possible is a red herring (and was only introduced by ourselves as an indication of just how far out of step the 31% figure is from reality).

What is undeniable is:

- The list of infrastructure allowed for in the Whole Plan Viability does not accord with what is actually required (and agreed as being required by IBC) to deliver major new development in the IGS;
- The infrastructure costs are therefore not reliable and therefore the appraisal itself is not reliable as regards the IGS.

As worded, Policy CS10 seeks 31% affordable housing, but the premise for that figure is a flawed viability assessment. This means that there is no credible evidence base to support that figure, regardless of whether it is mathematically possible or not.

There is however a credible evidence base to support an affordable housing target of 5%, because there are two site specific appraisals that show that outcome.

However, as we have stated previously, there is no harm in having an aspirational policy so long as it is credible. Therefore, a policy that seeks a minimum of 5% but a target higher than that of, say, circa 20% (as per our Hearing Statement), is credible, based on evidence, and yet still aspirational.

² Again, see our original Reg 19 representation for the comparison of infrastructure items allowed for by Aspinal Verdi compared to the site specific assessments.

The failure to provide a Main Modification to the affordable housing requirement to address the above means that the Plan remains unsound.

Viability Review

We note that IBC were asked by the Inspectors to review the wording of Policy CS10 with regard to the provisions for viability review, and in K22, IBC set out their reasoning for sticking to the wording as per the Submission Draft.

Although IBC correctly point out that the wording used has not prevented the grant of the permissions for Fonnereau and Henley Gate, each with viability review mechanisms, we would say that has been achieved in spite of the wording of the text, not because of it, and the text remains unclear.

The first relevant sentence, as currently drafted, states:

“The re-testing of the viability will occur pre-implementation of individual applications within each neighbourhood.”

Notwithstanding the attempted explanation, this sentence still remains unclear as to what is meant by “applications” and what is meant by “each neighbourhood”. Basically, the viability mechanisms in the Fonnereau and Henley Gate permissions require a review of viability prior to subsequent Reserved Matters phases (or more accurately at set trigger points within the s106). In that context, the word “applications” would be construed as Reserved Matters applications, and the word “neighbourhood” would actually mean “phase” (because each site within the IGS is referred to as a “phase”).

As currently written, the wording states that where a planning application has been granted (subject to a viability appraisal), that viability appraisal has to be revisited in the period between the grant and implementation of that permission, which, given timescales for undertaking and agreeing such reviews, effectively means the re-appraisal process would start pretty much as soon as the s106 is signed, which cannot be the real intention. It also means that where a single neighbourhood has more than one “phase” (i.e. it is controlled by two different parties who each bring forward their own application, as will be the case for Red House Neighbourhood), each party would be subject to a review (because of the wording “individual applications”), regardless of what affordable housing level they are providing.

At the very least, the wording in this sentence should be clarified to make clear that the word “application” means the second and subsequent Reserved Matters applications (as there shouldn’t be a review prior to the implementation of the first Reserved Matters), and the word “neighbourhood” should be changed to “phase” if IBC want to continue referring to individual application sites as phases.

The second relevant sentence states:

“Each phase of development will be subject to a cap of 35% affordable housing.”

Again, on the basis that the word “phase” in this sentence means an individual planning application site as per the phases plan shown in the document, then this sentence is, we would suggest, seeking a requirement that would either be unlawful in the determination of a planning application if the Council were to insist upon achieving 35%, or if that isn’t the case, serves no purpose. The reason we say this is that the policy target is 31% affordable housing. If Developer A is not able to achieve 31% affordable housing, it is unlawful to require Developer B to make up the shortfall of Developer A.

Therefore each “phase” (application site) cannot be expected to provide more than the policy target of 31%. A cap of 35% is therefore a meaningless provision.

If, however the use of the word “phase” here is intended to refer to subsequent phases of development within an application site, then we support this provision, because it would essentially provide that, even if viability improves, affordable housing is not provided at such a high proportion as to either result in an inappropriate concentration of affordable units in a single location, or risk the possibility that subsequent phases become inherently undeliverable due to requirements for high levels of affordable housing which provide no incentive on the developer to continue construction, notwithstanding the theoretical viability of the development overall.

In that context, either the word “phase” should be clarified in this instance as referring to a phase of development within a multi-phased application site, or, if the Council do not accept that clarification, the sentence should be removed.

Amended Local Centre Wording

In the Submitted version of the Plan, the uses permissible within the Local Centres included a specified amount of retail use (convenience and comparison), and also any use within the old Use Classes A2-A5, and non-retail uses falling within Class A1.

The new wording only allows for 5 specific uses in addition to retail – restaurants, cafes, offices, public houses and hot food takeaways.

This therefore means that all of the uses that were previously permitted under the old A1 non-retail usage are now no longer permissible. These uses include post offices, travel agency, hairdressers, funeral directors, hire shop, launderette and internet café, and others. We cannot see that there is any reasonable justification for preventing such uses within a Local Centre – they are all ‘classic’ Local Centre uses.

It is also not clear what the proposed amended wording means for A2 uses. Under both the old Use Classes Order and new Use Classes Order, general offices fall within a different use class to financial and professional services. So it is not clear therefore whether or not in referring to ‘offices’, the revised policy is only referring to new use class E(g)(i), or to professional and financial services under use class E(c).

The purpose of the new Class E Use Class is to promote the vitality of Local Centres by allowing uses to freely change between different types, and therefore there would need to be a very clear rationale for excluding uses that would otherwise fall within the same use class. There is nothing in the Modifications that explains why a hairdressers (by way of an example) would be inappropriate within a Local Centre.

In order to be sound, the list of uses should not therefore be precluding uses in Class E unless there are particular reasons for so doing.

A more appropriate update of the text to reflect the new Uses Classes would have been to ensure that the amendments allow for the same types of uses as the original text allowed i.e uses within Classes E(b) (for food and drink), E(c) (for financial and professional services), E(g)(i) (for offices) and then wine bars, public houses, and hot food takeaways as the additional sui generis uses that previously would have been permissible under Classes A4 and A5.

Policy CS10

Legally compliant? Yes

Sound? No (Justified/Effective)

Response:

By way of introduction, Mersea Homes Ltd is the principal developer for the Red House Neighbourhood, which comprises one of the three neighbourhoods that makes up the Ipswich Garden Suburb. Mersea Homes Ltd are also a partner in the delivery of the Fonnereau Neighbourhood.

Mersea Homes Ltd are broadly supportive of Policy CS10 and its various provisions, but in order to ensure effective delivery, there are three aspects of the policy that are considered to be unsound, as follows:

1. Elements of the detailed wording of the policy in relation to site specific matters and the role of the SPD, which relate to Effectiveness;
2. The Affordable Housing provisions, which relate to soundness issues in respect of the justification and the effectiveness of the Policy;
3. The wording of the Policy in respect of viability review provisions.

We deal with these three matters in turn below.

Policy CS10 wording relating to the Ipswich Garden Suburb SPD

In relation to the first matter, the text towards the end of the Policy deals with the SPD relationship. The text here is largely the same as in the existing adopted version of CS10 from the 2017 Core Strategy, but at the time the adopted version of CS10 was in preparation, the SPD had not been adopted. Although the current draft has updated to refer to the SPD as being adopted, there is then a slight anachronism in that the text goes on to state what the SPD “will” deliver instead of what it does provide. More generally, though, our concern at this point is the reference to the SPD identifying detailed locations for uses and infrastructure, which we do not consider is consistent with the stated purpose of the SPD as acting as guidance for development proposals (and arguably is also contrary to the relevant Local Plan Regulations in respect of the ability or otherwise for SPD to allocate land for development).

The text that refers to the SPD making site allocations can easily be removed if this section of the Policy is simplified as follows:

“An Ipswich Garden Suburb supplementary planning document (SPD) has been adopted which provides guidance on how the allocations in the development plan will be delivered both in spatial terms and in terms of sequencing, along with more general supplementary planning and design advice”

[This text is essentially copied from paragraph 1.11 of the SPD].

The text of Policy CS10 goes on to state that development proposals will be required to demonstrate that they are in accordance with the SPD. This sentence appears to misstate the purpose of the SPD as guidance in the determination of planning applications, and essentially prescribes the SPD the weight of statutory policy. The SPD clearly has weight as a material consideration, but the wording of Policy CS10 should, we consider, properly reflect that status. For example, the text might more appropriately state:

“Development proposals will be required to demonstrate how they have had regard to the principles and objectives of the adopted SPD.”

Affordable Housing Requirements

Turning then to the provisions for affordable housing, the previous planning applications for the Henley Gate and Fonnereau Neighbourhoods were both accompanied by viability assessments which contain baseline evidence in relation to the relative viability of development in the Ipswich Garden Suburb. These assessments were closely scrutinised by IBC’s own consultants and agreed as being correct.

Both agreed appraisals demonstrate the challenges for the delivery of Affordable Housing in the Ipswich Garden Suburb. Application IP/16/00608/OUT for the Henley Gate Neighbourhood was the subject of a resolution to grant from April 2018 based on 5% affordable housing provision 50/50 tenure split (with a viability review mechanism), and application IP/14/00638/OUTFL was the subject of a resolution at the same meeting based on 4% affordable housing provision 50/50 tenure split (also subject to viability review). Both applications were formally approved in January 2020. It should be noted that to achieve these reduced levels of affordable housing provision it was necessary for IBC to secure £10m of Infrastructure funding from the Government to reduce the very large infrastructure burden and allow the scheme to proceed.

Policy CS10 says that the Council will seek 31% affordable housing overall, but that no phase of the development shall provide more than 35% affordable housing. Two of the three Neighbourhoods (around 2000 homes out of the overall 3500) now have approval at affordable housing levels of 5% and 4%, therefore by our calculations, even allowing for the unlikely event that later phases of these approved schemes could deliver affordable housing at the maximum proportion, it is now mathematically impossible for 31% affordable housing to be achieved.

Firstly, therefore the overall quantum to be achieved requires revaluation in the light of the decisions already made.

Secondly, it will be apparent that, in coming to the conclusion that the Ipswich Garden Suburb can viably deliver 31% affordable housing across the board, **the Aspinall Verdi Whole Plan Viability Appraisal is wildly different to the site specific appraisals that the Council has recently confirmed as being correct.** The Aspinall Verdi appraisal uses a number of different assumptions to those contained in the agreed appraisals for Henley Gate and Fonnereau, but from an initial review of the model, it appears that the key variable relates to the assumed infrastructure costs. **The Aspinall Verdi assessment assuming infrastructure costs of around £79,000 per net development acre** and those costs are made up of the following -

- Decentralized power
- RAMS

- Natural Environment
- Electric Charging Points

Whereas the actual infrastructure costs agreed through the site specific appraisals for Henley Gate and Fonnereau include the following -

- Acoustic Fencing
- Strategic SUDs
- Strategic Foul Water Drainage
- Strategic Services & Diversions
- Strategic Roads on and off site
- Strategic footpaths and cycleways on and off site
- Archaeological
- Ecological Mitigation inc RAMS
- Travel Planning measures
- Green Infrastructure deliver inc allotments play areas sports pitches

The original Infrastructure Delivery Plan document produced by Gerald Eve and Mott Macdonald on behalf of the Council estimated the cost of Infrastructure to be £132,222,060 or approximately £535,000 per net developable acre. Subsequently for the agreed viability assessments as mentioned above savings were found and HIF funding secured so that this figure was able to be reduced to approximately £420,000 per acre (but that excludes decentralised power).

It is therefore clear that the Aspinall Verdi work has such significant errors in it, that it renders the outcomes as meaningless.

It is unclear as to why the Whole Plan Viability Appraisal has been progressed on the basis of assessing the Ipswich Garden Suburb as if there were no existing permissions and as if the whole of the 3500 units were unconsented, but the result is that the Appraisal has produced an outcome that is both unreliable, unevidenced, and effectively impossible to achieve.

The Council will be aware that we are currently in the process of pre-application discussions in advance of the submission of an outline application for the majority of the Red House Neighbourhood, and we are expecting to submit viability evidence in respect of that application.

Based on essentially the same assumptions used for the previous viability assessments, but updating those assumptions to a 2020 base date, we currently expect the level of affordable housing to be deliverable from the Red House Neighbourhood will be significantly less than 31% and we recommend that Aspinall Verdi review their report based on the Council's own latest evidence.

The policy is neither justified nor would it be effective in seeking affordable housing at the suggested level and needs to be corrected.

Viability Review Provisions

Both the Henley Gate and Fonnereau planning consents are subject to viability review mechanism, which require a reappraisal of viability at set points in the development programme. We have no objection in principle to viability review mechanisms and would expect the remaining permissions within the Ipswich Garden Suburb to be subject to such provisions, if affordable housing is to be delivered at less than the eventual policy requirement (the starting point, however, should be to set an appropriate policy requirement that is achievable, as discussed above).

As currently drafted, however, the text relating to viability review in Policy CS10 is impractical and imprecise. The wording states that viability will be re-tested prior to implementation of applications within each neighbourhood, but is not clear as to whether it is referring to outline applications or reserved matters applications. If the former, then the re-testing prior to implementation would serve no purpose, because in all likelihood the Outline permission will only have been granted relatively recently, and so the re-test would be likely to produce similar results. If the intention were to re-test before implementation of each Reserved Matters implementation, then re-testing might either be happening on an unrealistically frequent basis if a phase is made up of many Reserved Matters, or otherwise might not happen at all if a developer came forward with a single large Reserved Matters application for an entire site.

In practice, the s106 agreements for Henley Gate and Fonnereau set triggers for re-testing of viability based on fixed stages within the development process, informed by the likely development phasing, and the triggers are not linked to the approval process for subsequent applications. This is the most effective and practical approach to re-testing of viability on large sites.

Accordingly, the text of the Policy needs to exclude reference to re-testing on application, and instead say that triggers for re-testing of viability will be agreed as part of the s106 obligations at the planning permission stage.



Ministry
of Defence

Grafton House
15-17 Russell Road
Ipswich Suffolk
IP1 2DE.

Defence Infrastructure Organisation

Safeguarding Department
Statutory & Offshore
Defence Infrastructure Organisation
St Georges House
DIO Head Office
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

14th September 2021

Your Ref: Ipswich Local Plan Review 2018-2036

DIO Ref: 10048530 Rev1

Dear

Ipswich Local Plan Review 2018-2036

Proposed Main Modifications - Core Strategy and Policies Development Plan Document Main Modifications, Site Allocations and Policies, Development Plan Document Main Modifications

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate.

This response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

It is understood that Ipswich Borough Council are undertaking a consultation on the Core Strategy and Policies Development Plan Document Main Modifications, Site Allocations and Policies, Development Plan Document Main Modifications, which are the modifications considered necessary to make the Ipswich Local Plan review sound / and or legally compliant.. The consultation relates to a submission of the Core Strategy and Policies Development Plan Document Main Modifications, Site Allocations and Policies, Development Plan Document Main Modifications

Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Ministry for Housing, Communities & Local Government (MHCLG) in accordance with the provisions of that Direction.

Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.

Having reviewed the supporting documentation in respect of Ipswich Borough Council Local Plan Review 2018-2036 Core Strategy and Policies Development Plan Document Main Modifications, Site Allocations and Policies, Development Plan Document Main Modifications there are two areas of interest for the MOD, these being RAF Wattisham and the East 2 WAM network (a new technical asset consisting of a network of linked sites, whereby statutory safeguarding zones have been designed to ensure development which might impact on the operation and capability of both the linked sites, and the links between them, will result in consultation).

DIO Safeguarding has previously responded to Ipswich Borough Council Local Plan Review (IBCLPR)2018-2036 on 19/10/2017. The MOD highlighted principle concerns regarding the IBCLPR, these concerns being to ensuring that tall structures especially tall buildings do not cause an obstruction to air traffic movements at MOD aerodromes or compromise the operation of air navigational transmitter/receiver facilities located in the area. Additionally, the creation of open water bodies which potentially become an attractant to hazardous birds, posing an increased risk to aircraft using military aerodromes in this vicinity. Our original comments remain relevant.

The MOD's second area of interest, as mentioned above, is a new technical asset known as the East 2 WAM Network which contributes to aviation safety by feeding into the air traffic management system in the east of England. There is the potential for development to impact on the operation and/or capability of this new technical asset located within and passing through the IBCLPR area of interest.

The Safeguarding map associated with the East 2 WAM network has been submitted to MHCLG for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines) are of particular concern. Wherever the criteria is triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.

For your convenience, a copy of the safeguarding plan passed to MHCLG for formal issue has been attached to this email.

In addition, where development falls inside or outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. Examples of this type of development are the installation of renewable energy generation systems and their associated infrastructure. The MOD has, in principle, no issue or objection to renewable energy development though some methods of renewable energy generation, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace encompassing military aerodromes, and impede the operation of safeguarded defence technical installations. In addition, where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations with associated impacts upon aviation safety and operational capability. Planning Practice Guidance published on the Gov.uk website acknowledges the potential effect of wind turbine generators and directs developers and Local Planning Authorities to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.

With regard to the current proposal of the Ipswich Borough Council Local Plan Review 2018-2036, the MOD have no concerns to the Core Strategy and Policies Development Plan Document Main Modifications, Site Allocations and Policies, Development Plan Document Main Modifications.

I trust this clearly explains our position on this consultation. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely

DIO safeguarding

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

N

Our ref: Ipswich Main Modifications
Your ref:

Ipswich Borough Council,
Planning Policy,
3W Grafton House,
15-17 Russell Road,
Ipswich,
IP1 2DE

Operations - East
Woodlands
Manton Lane
Bedford MK41 7LW

Direct Line:

Dear Sir,

Ipswich Local Plan Main Modification consultation

Thank you for your consultation.

We have previously commented on the local plan, we welcome policies which promote walking cycling and public transport. The Covid 19 pandemic has resulted in more people choosing to work from home, policies which support this are welcomed by National Highways.

We have the following specific comments on the proposed modifications

We note the slight reduction in overall housing numbers proposed during the plan period, this is likely to have little impact on the transport implications of the local plan growth.

We welcome the policy ISPA 2 reference to improvements to the A12 and A14 however, these are not described or defined in any detail.

Should the policies be reordered to reflect national policy ie put walking, cycling and public transport in front of physical highway improvements.

The proposed expansion of the travellers site at Water Meadow, should be acceptable, however a transport assessment will be required by National Highways and this may identify an impact that may require mitigation.

Yours faithfully

Assistant Asset Manager
Operations (East)

Date: 23 September 2021
Our ref: 361910
Your ref: Ipswich Local Plan Review Main Modifications Consultation



PlanningPolicy@ipswich.gov.uk
BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T

Dear

Ipswich Local Plan:

- (1) Core Strategy and Policies Development Plan Document Main Modifications**
- (2) Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Main Modifications**
- (3) Sustainability Appraisal of Main Modifications**
- (4) Habitats Regulations Assessment of Main Modifications Core Strategy and Development Plan Document Review**
- (5) Habitats Regulations Assessment of Main Modifications Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review**

Thank you for your consultation on the above dated 28 July 2021 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

(1) Core Strategy and Policies Development Plan Document Main Modifications

Natural England has no comment to make in regard to the Core Strategy and Policies Development Plan Document Main Modifications.

(2) Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Main Modifications

Recreational Disturbance – European designated sites

We note that a large number of the new policies relating to residential allocations include the following statement, “mitigation will be required to address impacts to the Stour and Orwell Estuaries SPA/Ramsar from recreation, and this can be achieved through contribution to the RAMS.”

The Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (‘RAMS’) has been put in place to ensure that the additional recreational pressure due to increasing levels of housing across the county is not likely to lead to an adverse effect on European designated sites on the Suffolk coast. The strategy allows mitigation to be dealt with on a strategic level, so that the relevant councils, Natural England and relevant stakeholders are able to work together to provide the best outcomes for the designated sites. It also has the benefit of streamlining the process, so reducing the amount of time taken to process individual residential planning applications for the councils and

Natural England.

Natural England worked collaboratively with all the relevant councils, including Ipswich Borough Council, to set up the strategy. We fully support the aims of the strategy; in our view it is the best way to provide appropriate avoidance and mitigation measures for the European sites in question. However, we also advise that a contribution to the RAMS strategy alone for residential developments within the 13km zone of influence is not always sufficient to determine that there will not be an adverse effect on the integrity of the relevant European designated sites, primarily in this instance the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar. It is considered that larger residential developments (50 units +, or equivalent, as a guide) within the 13 km Suffolk Coast RAMS zone of influence, or some smaller residential developments that are in very close proximity (200m or less) to designated sites, are not able to fully mitigate the adverse impacts on European designated sites with a RAMS payment alone. Natural England therefore recommends that these developments include the provision of well-designed open space/green infrastructure (GI) that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the development site boundary. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km¹ within the site and/or with links to surrounding
- public rights of way (PRoW)
- Dedicated 'dogs-off-lead' areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

As such we consider that policies for larger residential developments (50 units +, or equivalent, as a guide) and any smaller residential developments that are in very close proximity (200m or less) to designated sites, should be amended to reflect that further mitigation will be required beyond a contribution to the Suffolk Coast RAMS to ensure no adverse effect on the integrity of any European site as a result of recreational disturbance. These comments are consistent with our previous advice provided at earlier stages of the Ipswich Local Plan.

There is also some inconsistency throughout new policies relating to residential allocations in regard to the Suffolk Coast RAMS and recreational disturbance. Some policies which allocate sites over 50 dwellings refer directly the requirement for a project level HRA "to check the site design" whilst others do not. Likewise, there is some inconsistency in whether policies for allocated sites below 50 dwellings directly reference a requirement for a proportionate contribution to the Suffolk Coast RAMS. For example there is no mention within 'New Policy Former School Site, Lavenham Road (IP061)'. We advise that the new policies relating to residential allocations are checked to ensure consistency on this matter.

MM199 & MM200 - New Policy Sites off Nacton Road, South Ravenswood

Allocation IP150b is directly adjacent to the Brazier's Wood, Pond Alder Carr and Meadows County Wildlife Site (CWS) which could be affected by urbanisation and recreational disturbance as a result of the new Ravenswood policy sites. The CWS supports many breeding skylark territories. Breeding skylarks are susceptible to recreational disturbance, primarily from dogs-off-leads. You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 174, 175, 179 and 180 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

¹ Taken from *Jenkinson, S., (2013), Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers*

Biodiversity Net Gain

We welcome and commend the various new policy statements which seek to ensure biodiversity net gain is delivered on new development sites, as well as other biodiversity enhancement and protection measures incorporated.

(3) Sustainability Appraisal of Main Modifications

We are satisfied that the methodology and baseline information used to inform the report appears to meet the requirements of the SEA Directive [2001/42/EC] and associated guidance. Furthermore the SA of the main modifications contains a robust assessment of the environmental effects of plan policies and allocations on statutorily (and non-statutorily) designated sites and landscapes including the Orwell Estuary SPA, SSSIs and the Suffolk Coast and Heaths AONB and has taken into account both our advice and the findings of the HRA.

We also wish to state that we support the recommendation for a coherent GI network, which would improve have multiple beneficial effects including improving access to nature, mitigation for recreational impacts on designates sites and improvements to local biodiversity.

(4) Habitats Regulations Assessment of Main Modifications Core Strategy and Development Plan Document Review

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any related planning permissions given.

(5) Habitats Regulations Assessment of Main Modifications Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review

Unfortunately we were unable to access/download the 'Habitats Regulations Assessment of Main Modifications Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review' from the Council's website. If the council could provide send the document directly at the earliest possible occasion we would be happy to provide a prompt response.

If you have any queries relating to the advice in this letter please contact me on

Yours faithfully

Lead Adviser, Norfolk and Suffolk Team

Date: 24 September 2021
Our ref: 361910
Your ref: Ipswich Local Plan Review Main Modifications Consultation



PlanningPolicy@ipswich.gov.uk
BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T

Dear

**Ipswich Local Plan:
Habitats Regulations Assessment of Main Modifications Site Allocations and Policies
(Incorporating IP-One Area Action Plan) Development Plan Document Review**

Thank you for your consultation on the above dated 28 July 2021 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

In our previous consultation response (dated 23rd September 2021) we noted that we were unable to access the 'Habitats Regulations Assessment of Main Modifications Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review' from the council's website. The council has since sent us the HRA directly and on this document we offer the following advice:

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the plan in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard to Natural England's advice.

Your appropriate assessment concludes that your authority is able to ascertain that the plan will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for any adverse effects, it is the advice of Natural England that **it is not possible** to ascertain that the plan will not result in adverse effects on the integrity of the sites in question.

Natural England advises that the assessment does not currently provide enough information and/or certainty to justify the assessment conclusion and that your authority should not adopt the plan at this stage.

Further assessment and consideration of mitigation options is required, and Natural England provides the following advice on the additional assessment work required;

As stated within our previous consultation response (23rd September 2021, our ref: 361910) we note that a large number of the new policies relating to residential allocations include the following statement, "mitigation will be required to address impacts to the Stour and Orwell Estuaries

SPA/Ramsar from recreation, and this can be achieved through contribution to the RAMS.”

The Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (‘RAMS’) has been put in place to ensure that the additional recreational pressure due to increasing levels of housing across the county is not likely to lead to an adverse effect on European designated sites on the Suffolk coast. The strategy allows mitigation to be dealt with on a strategic level, so that the relevant councils, Natural England and relevant stakeholders are able to work together to provide the best outcomes for the designated sites. It also has the benefit of streamlining the process, so reducing the amount of time taken to process individual residential planning applications for the councils and Natural England.

Natural England worked collaboratively with all the relevant councils, including Ipswich Borough Council, to set up the strategy. We fully support the aims of the strategy; in our view it is the best way to provide appropriate avoidance and mitigation measures for the European sites in question. However, we also advise that a contribution to the RAMS strategy alone for residential developments within the 13km zone of influence is not always sufficient to determine that there will not be an adverse effect on the integrity of the relevant European designated sites, primarily in this instance the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar. It is considered that larger residential developments (50 units +, or equivalent, as a guide) within the 13 km Suffolk Coast RAMS zone of influence, or some smaller residential developments that are in very close proximity (200m or less) to designated sites, are not able to fully mitigate the adverse impacts on European designated sites with a RAMS payment alone. Natural England therefore recommends that these developments include the provision of well-designed open space/green infrastructure (GI) that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the development site boundary. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km¹ within the site and/or with links to surrounding
- public rights of way (PRoW)
- Dedicated ‘dogs-off-lead’ areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

As such we consider that policies for larger residential developments (50 units +, or equivalent, as a guide) and any smaller residential developments that are in very close proximity (200m or less) to designated sites, should be amended to reflect that further mitigation will be required beyond a contribution to the Suffolk Coast RAMS to ensure no adverse effect on the integrity of any European site as a result of recreational disturbance. These comments are consistent with our previous advice provided at earlier stages of the Ipswich Local Plan.

There is also some inconsistency throughout new policies relating to residential allocations in regard to the Suffolk Coast RAMS and recreational disturbance. Some policies which allocate sites over 50 dwellings refer directly the requirement for a project level HRA “to check the site design” whilst others do not. Likewise, there is some inconsistency as to whether policies for allocated sites below 50 dwellings directly refer to a requirement for a proportionate contribution to the Suffolk Coast RAMS. For example there is no mention within ‘New Policy Former School Site, Lavenham Road (IP061)’. We advise that the new policies relating to residential allocations should be checked to ensure consistency on this matter.

Should the above advice be applied to the Main Modifications Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review and be considered

¹ Taken from *Jenkinson, S., (2013), Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers*

within the Habitats Regulations Assessment, we advise that the plan will not result in an adverse effect on the integrity of any European designated site.

If you have any queries relating to the advice in this letter please contact me on .

Yours faithfully,

Lead Adviser, Norfolk and Suffolk Team

Date: 05 October 2021
Our ref: 369844
Your ref: Ipswich Local Plan Review Main Modifications Consultation



PlanningPolicy@ipswich.gov.uk
BY EMAIL ONLY

Customer Services
Hornbeam House
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Crewe
Cheshire
CW1 6GJ

T

Dear

**Ipswich Local Plan:
Habitats Regulations Assessment of Main Modifications Site Allocations and Policies
(Incorporating IP-One Area Action Plan) Development Plan Document Review**

Thank you for your continued consultation on the above.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

In our previous consultation response on the above (dated 24th September 2021, our ref: 361910), we advised that:

- *'having considered the assessment, and the measures proposed to mitigate for any adverse effects, it is the advice of Natural England that it is not possible to ascertain that the plan will not result in adverse effects on the integrity of the sites in question.'*
- *'the assessment does not currently provide enough information and/or certainty to justify the assessment conclusion and that your authority should not adopt the plan at this stage.'*
- *'policies for larger residential developments (50 units +, or equivalent, as a guide) and any smaller residential developments that are in very close proximity (200m or less) to designated sites, should be amended to reflect that further mitigation will be required beyond a contribution to the Suffolk Coast [Recreational Disturbance Avoidance and Mitigation Strategy] RAMS to ensure no adverse effect on the integrity of any European site as a result of recreational disturbance.'*

The further Plan policy measures which we advised were necessary related to securing the provision of well-designed open space/green infrastructure (GI) within developments, proportionate to their scale. This is in order to minimise any predicted increase in recreational pressure to European designated sites, by containing the majority of recreation within and around a development site boundary. Our concerns related to some of the wording within the Site Allocations and Policies Document, which appeared to indicate that certain residential site allocation policies >50 units (dwellings) would be considered fully mitigated in regard to recreational disturbance on European sites through a financial contribution to the RAMS strategy alone.

Following our consultation response, we attended a meeting with Ipswich Borough Council on the 5th October 2021 to discuss our concerns. The council provided further information and clarification on how this advice had already been captured by their core strategy policy DM8 and their active

Suffolk Coast RAMS Supplementary Planning Document (SPD). The council highlighted that the residential planning policies within the '*Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document*' outline site constraints only and compliance with the core strategy policy DM8 and RAMS SPD are sufficient to provides the necessary safeguards with respect to this issue.

On this basis, we agree with the councils reasoning and are now satisfied that the Plan will not result in adverse effects on the integrity of any of the European sites in question, providing that all mitigation measures are appropriately secured in any related planning permissions, consistent with the Plan policy. As such this advice supersedes our previous consultation letter (dated 24th September 2021, our ref: 361910).

Therefore, in the context of our remit, Natural England considers the approach taken with regards to the natural environment within the Ipswich Local Plan to be sound.

If you have any queries relating to the advice in this letter please contact me on .

Yours faithfully,

Lead Adviser, Norfolk and Suffolk Team



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Please find the attached comments on the Proposed Main Modifications to the Core Strategy and Polices Development Plan Document. Whilst we still have concerns on other parts of the Core Strategy, we have limited our comments to sections on Air Quality, as we strongly believe that our concerns have not been adequately addressed in the main modifications proposed by IBC. In specific relation to air quality issues, we do not believe that the Plan has been positively prepared. In our view, the following main modifications are not sufficient for the Plan to be found to be sound and will not result in legal compliance. We believe that further modifications are justified and required for the Plan to be effective and consistent with national policy in relation to air quality.

For ease of reference the following text in black is taken from the proposed Main Modification version of the Plan and our comments are provided in blue.

MM3 Paragraph 6.8 Amend paragraph 6.8, Objective 5 to read as follows: ‘5. AIR QUALITY AND CLIMATE CHANGE - Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.’

NPPF Paragraph 186 states that “Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement”

The proposed modification still fails to include an objective for AIR QUALITY “to contribute towards compliance with relevant limit values” as required under the NPPF (and legally binding air quality legislation). The proposed modification is therefore neither effective, nor consistent with national policy. We suggest that IBC should ensure compliance with legally binding targets by 2024, which would be 16 years since the publication of IBC’s first Air Quality Action Plan in 2008¹ and consistent with IBC’s current Air Quality Action Plan 2019-2024. The AQAP should have been designed to ensure compliance with legally binding limit values for it to have been approved by Councillors as fit for purpose; so there is no reason why 2024 should not be included in the Plan. If 2024 is not accepted by IBC, then it clearly illustrates that the current AQAP is inadequate and needs to be urgently revised to ensure compliance.

Therefore MM3 needs to be further amended to read:

“Every development should contribute to the aim of compliance with relevant air quality limit values for pollutants in Ipswich by 2024 (by eradicating AQMAs)”.

This is justified as it would help prevent further un-necessary deaths and instances of respiratory illness in Ipswich.

MM77 Paragraph 9.3.1 Amend Paragraph 9.3.1 to read as follows: ‘The focus of Policy DM3 is to mitigate the impact of development on air quality and to ensure exposure to poor air quality is

¹ [Ipswich Air Quality Action Plan 2008](#)

reduced in the Borough, to contribute towards achieving compliance with air quality limit values for pollutants.'

The proposed modification MM77 is insufficient and needs to include a compliance date to be effective and consistent with national policy. We advocate that this is set at end 2023. Without a target date Policy DM3 cannot possibly be effective. We note that paragraph a) repeated below references that Development proposals should not "delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits". Consequently a date for compliance must be included in the Plan, otherwise how will compliance with this requirement be assessed?

MM77 therefore should be amended to read

"... .. to contribute towards achieving compliance with air quality limit values for pollutants by end 2023."

POLICY DM3: Air Quality

The Council will ensure that the impact of development on air quality is mitigated and ensure that proposals do not negatively impact on existing air quality levels in the Borough. The Council will take into account the impact of air quality when assessing development proposals, through consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Development proposals should not: a) create any new areas that exceed air quality limits or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; b) reduce air quality benefits that result from the Borough Council's activities to improve air quality; and c) create unacceptable risk of exposure to high levels of poor air quality, for example, through having a negative impact on an existing AQMA. An Air Quality Assessment (AQA) will be required where development proposals are likely to expose residents to unacceptable levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact. Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan. Development should be consistent with the actions identified in the Council's Air Quality Action Plan, where appropriate.

MM99 Policy DM21 Amend Policy DM21: Transport and Access to New Developments, to read as follows: 'POLICY DM21: Transport and Access to New Developments To promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall:

b. not result in a significant detrimental impact on air quality ~~or an Air Quality Management Area~~ and shall address the appropriate mitigation measures as required ~~through~~ in accordance with Policy DM3.

To be consistent with Policy DM3, MM99 also needs to make it clear that there should not be any "negative impact" on, and around, existing AQMAs from new development or the exceedances of legally binding limit values anywhere in Ipswich. We also note that there is no definition of "significant" and suggest that this needs to be deleted. To be effective and consistent with national policy MM99 needs to be revised and we suggest the following, which is more consistent with Policy DM3.

"shall:

b. not result in:

1. any detrimental impact on air quality in and around the existing AQMAs,
2. the creation of any new AQMAs,
3. a detrimental impact on air quality elsewhere in Ipswich that is likely to result in a negative impact on health.”

MM143 Objective 5 Amend Objective 5: Air Quality, to read as follows: ‘OBJECTIVE 5: AIR QUALITY AND CLIMATE CHANGE

Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.

INDICATOR(S)

~~Per Capita CO2 emissions in the local authority area.~~

Local authority CO2 emissions. Local authority air pollution data.

Number and extent of designated AQMAs.

NOx concentrations measured through AQMA data and DEFRA returns.

TARGETS

~~To reduce the level of identified air pollutants in the National Air Quality Strategy.~~

To reduce the extent of AQMAs by 2036 in accordance with the corporate Air Quality Action Plan Review (Council Target).

The reference to “the corporate Air Quality Action Plan Review (Council Target)” should be removed as a) this Review is not in the public domain and b) has not been agreed so it is therefore not yet a Council target. We strongly object to the proposed 2036 date as this will result in further unnecessary deaths and cases of respiratory illness in Ipswich. It is clearly not effective, justified, or consistent with national policy to continue to allow illegal air quality levels in Ipswich for another 25 years. It clearly illustrates that IBC is not taking its air quality duties seriously.

We note that since its first Air Quality Action Plan in 2008, IBC has failed to improve air quality in Ipswich and the number of AQMAs has been increased from the initial three AQMAs.

We also note that this target could be achieved by reducing just one of existing AQMAs by just 1m².

The Executive Summary of IBC’s current Air Quality Action 2019-2024 states that “*Ipswich Borough Council is committed to reducing the exposure of people in Ipswich to poor air quality in order to improve health.*” This target is therefore inconsistent with IBC’s own AQAP as it illustrates no real commitment to reducing the exposure of people in Ipswich to poor air quality. It is clearly worthless and needs to be replaced with a target that will ensure compliance with UK air quality legislation and NPPF paragraph 186. MM143 should be revised to read

OBJECTIVE 5: AIR QUALITY AND CLIMATE CHANGE

Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels and to contribute towards achieving compliance with air quality limit values for pollutants by 2024.”.

INDICATOR(S)

Local authority CO2 emissions. Local authority air pollution data.

Number and extent of designated AQMAs.

NOx and particulate concentrations measured through AQMA data and DEFRA returns.

TARGETS

To eradicate all AQMAs and comply with UK limit values for air pollutants by 2024.

Unfortunately, as currently drafted, this illustrates the lack of ambition the Council has in improving air quality in Ipswich. It would also appear that the Council has little intention of trying to eradicate illegal air pollution any time soon and demonstrates why the Local Plan must impose a target on the

Council to comply with legally binding UK air quality targets for it to be sound, effective, and consistent with national policy.

Other modifications required for correction purposes

In addition, the following paragraphs and Plan 7 need to be corrected as IBC now has four declared AQMAs following The Executive meeting on 10th August 2021 (see draft minutes at [Executive draft minutes 10th August 2021](#)).

8.241 There are particular concerns about highway capacity within the Star Lane area of Ipswich Town Centre, as this impacts on east-west vehicle movements and pedestrian connectivity between the central shopping area and the Waterfront. These capacity implications are closely linked to issues associated with the wider transport network – including the A14 and the Orwell Bridge. There are, in addition, five Air Quality Management Areas (AQMAs) within the central area of Ipswich, as a result of pollutants from road traffic. Air Quality Management Areas are designated in areas where poor air quality may have an effect on people’s health.

9.3.2 Ipswich has 5 Air Quality Management Areas (AQMAs) and therefore developers must give careful consideration to the air quality impacts of their proposed development. Plan 7 identifies the 5 AQMAs in Ipswich.

On behalf of the Northern Fringe Protection Group
17th September 2021

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

R

From: randomcamel randomcamel
Sent: 23 September 2021 22:46
To: PlanningPolicy
Subject: Public Notice Proposed Local Plan Site Allocation Notice IP035

EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe.

Hello

We are writing in response to the Public Notice IP035 in relation to the area between Key St, Star Lane and Burton's (St Peter's Port) in Ipswich.

We're not in favour of this proposed local plan site allocation notice, and would like to list the reasons why.

The area, particularly the area to the South-West by Stoke Bridge suffers from heavy air pollution due to being one of few transits over the River Orwell. The amount of air pollution here is some of the highest in Europe. Building 86 dwellings and commercial properties on this plot of land would only increase this traffic and thus the air pollution in the local area - already compounded locally by the bus depot to the North-East of said area.

That increase in traffic, it goes without saying, would be added onto an already overtaxed one way system which is almost always congested at key times of the day - especially to the East towards the confluence of Star Lane and Grimwade St. Furthermore, the development of a complex of the proposed density would be a construction project that would require influx and output of vehicles that would further stress those roads over the period of building, leading to even more intense pollution.

Furthermore, this is the only green space that exists on the entirety of that map. There is absolutely no other multiflora green space in the vicinity of this area before Alexandra, Christchurch or Gippeswick Park. The buddleia bushes that have grown up over the last few years of disuse have shown themselves to be a haven for insect life, in particular bees and butterflies. We would propose further intentional diversification of the flora in this area to encourage and develop this urban oasis. It is our understanding that funding already exists to this end within the local area budget.

Finally, we would like to speak on the lack of necessity of a further development in the area of the

waterfront. There have been a number of developments in that area - The Mill, Cardinal Lofts, The Winerack to name but a few. Are all of these at maximum uptake and capacity? All the information we have found indicates that they are not. There is not a housing shortage in Ipswich, much less a collection of properties owned by portfolio enterprises that are renting them at ever spiralling costs.

Finally, on a practical level, the open space allows sunlight down Foundation Street and Lower Brook St and other adjoining streets. We and other local residents would very much like to not have to live in the shadow of a high-density housing, commercial and office block.

It is for these reasons that we hope this plan site allocation will not go through, and are happy to discuss further if that would be helpful.

Many thanks,
Member, Random Camel Housing Co-Op

On behalf of all seven members of the housing co-operative.

Ravenswood Environmental Group



Ipswich Borough Council
3W Grafton House
Russell Road
Ipswich
Suffolk
IP1 2DE.

20th September 2021

Dear Sirs,

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

We write in response to the Ipswich Local Plan Review 2018-2036 Proposed Main Modifications consultation with focus on MM199 and MM200 and refer to related documents and local plan text deletions as relevant.

The Ravenswood Environmental Group is extremely concerned that the Local Plan - born out of minimal and misleading consultation during a time of national emergency - is being substantially re-drafted at the Main Modifications stage.

The suggested necessary changes required to the Local Plan to make it "sound" are so significant that the plan requires proper re-assessment through the formal Local Plan process. In an attempt to overcome criticisms that the Local Plan is misleading and fails to comply with legal requirements the Borough Council is, in effect, creating a new Local Plan through its Main Modifications.

Those modifications are so significant that they point to a Local Plan at Examination which is unsound. Clearly, the process of publishing Main Modifications is not intended to allow for a redrafting of the Local Plan but that is what is proposed here.

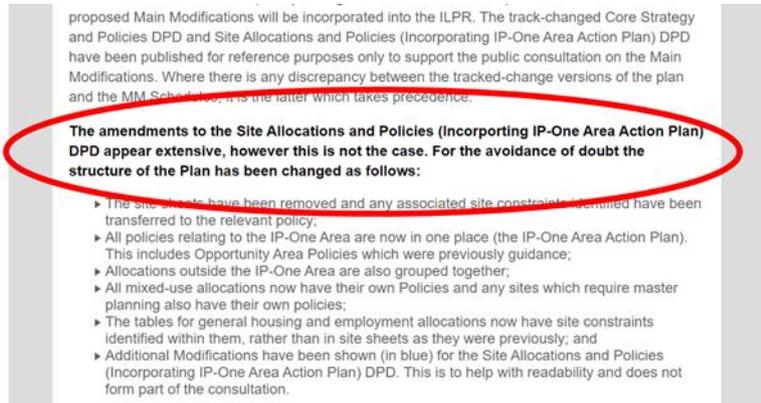
The principle concerns raised relate to the "Schedule of Proposed Main Modifications – Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review".

The entire Local Plan wording for Sites IP150b, IP150c, IP150d and IP152 is deleted and replaced by a +900 word "Frankenstein's Monster" Site Allocation Policy with 1100 words of supporting text. To confuse the reader the Policy is simply called "New Policy" and each Paragraph is called "New Paragraph" so one cannot refer to those new paragraphs or distinguish the New Policy from the many other New Policies in this New Plan masquerading as a Main Modifications consultation.

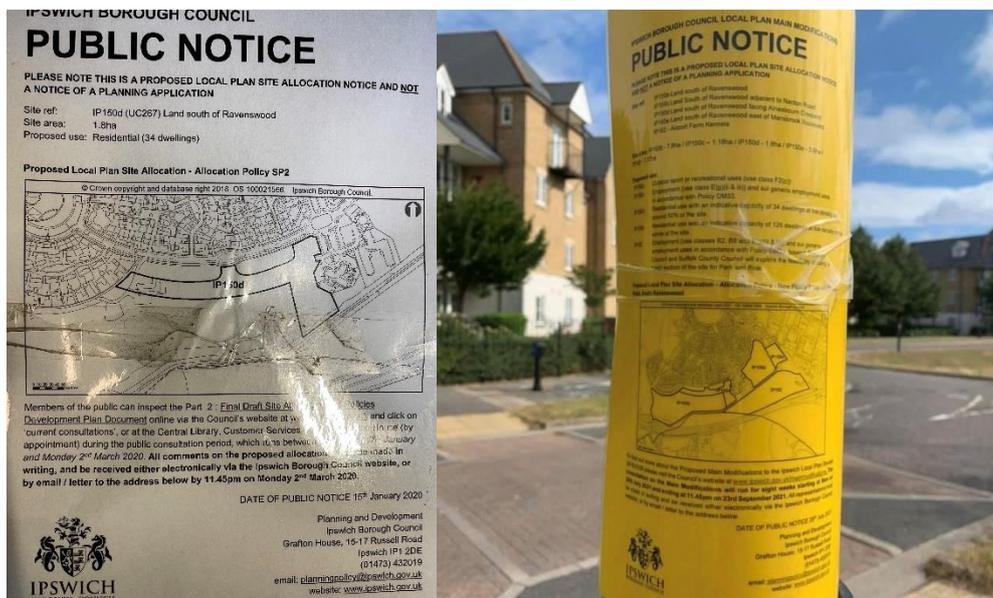
Ravenswood Environmental Group



To pre-empt the criticism that it is creating a new Local Plan at the 11th hour, the Council seeks to influence its consultees through its introductory remarks below:



The Local Plan Main Modifications has been advertised with site notices which now show each of the IP150 sites on the same plan. This consultation therefore exposes the Borough Council's previous protestations in core document K12 that a plan-based site notice which doesn't show adjacent sites is not misleading. In the 15th January 2020 Consultation, residents were looking at a site notice in front of a 1.8 hectare site but on 23rd July 2021 residents were being presented with a site notice, on the same lamppost, alerting them to a 22.7 Hectare site proposed in various individual but related parts.



The New Policy for "Sites off Nacton Road, South Ravenswood" has not been subject to proper Sustainability Assessment or Habitats Regulations Assessment

Ravenswood Environmental Group



because the updated versions of those documents add nothing to the previous assessments which failed to look at cumulative impacts of a 22.7 Hectare site.

The New Policy fails to establish an access regime for the site when it is clear that this was a primary concern of the now defunct appendix 3 alongside the Submission Local Plan. The Borough Council had previously “floated” the idea that it would be relocating the Ravenswood bus-gate at Core Document K11.

K9	IBC Response to Inspectors' Request to Define 'Inappropriate Development' in Policy CS2 - SUPERSEDED by the Schedule of Main Modifications	
K10	IP-One Area Map with Site Allocations, Quarters and Opportunity Areas	Dec 2020
K11	Ravenswood Capacity Management Options	Dec 2020
K12	Note on compliance with SCI in response to SOCS and REG comments	Dec 2020
K13	IBC response to SOCS/NFPG comments on SA	Jan 2021
K14	A1214 IGS Trigger Points Modelling note	Dec 2020
K15	IP132 Waterfront site - note on master planning and decontamination	Jan 2021
K16	Letter from Handford Homes about delivery of IBC housebuilding programme	Jan 2021

That suggestion served to emphasise that no new primary all vehicle access would be proposed for the development yet the Transport Assessment work and Local Plan drafting to date is vague. The ideas of K11 are absent from the New Policy.

If a New Policy is to be carried through to an adopted Local Plan then we believe that the New Policy should insist on a new access to this very large mixed use development site. Instead there is merely an admission in new supporting text to say that highway junctions here “are already under strain” without a coherent plan to make this very large New Policy site accessible. Without this plan or assessment, there is no justification or explanation of the capacity of this site to accommodate very significant development.

The type and tenure of housing is also a key concern here given that the Borough Council is committed to proposing a development consisting solely of Social Housing at sites UVW to the north in breach of a previously dismissed appeal. It is vital that any new residential development reflects the existing mix within Ravenswood to ensure that a balanced community is created to integrate within the locality. At sub paragraph iii the New Policy should be clear that the mix of housing should be balanced with market housing and that a 15% quota (or other specified %) should be applied to the proportion of Affordable Housing proposed. Additionally, the affordable housing should include First Homes.

At sub paragraph xv the S106 list is closed and needs to be open to mitigating the impact of the development. The list should be an open list stating that S106 Planning Obligations will be required to help to mitigate the environmental and infrastructure impacts of development. Financial contributions should include funding for a Recreation Avoidance Mitigation Strategy in the event that the New

Ravenswood Environmental Group



Plan is found sound. This would assist with mitigating the impact of industrial development and population growth upon the Orwell Estuary SPA, SSSI, RAMSAR site, Bridge Wood Local Wildlife Site and County Wildlife Site which are immediately adjacent.

Our primary concerns remain. This is not a collection of small sites; it is a large mixed use allocation which will have serious environmental and social impacts.



22.7 Hectare Development Allocation South of Ravenswood, Off Nacton Road, Ipswich.

The New Policy presupposes that each of these are fixable. It purports to import the collected, randomly expressed, alarming site constraints from the old local plan appendix. These are now cleansed and inserted into this completely New Local Plan without any certainty or evidence to suggest how an accessible, environmentally sustainable, socially inclusive, ecologically sensitive and climate crisis resilient development can be achieved.

The Main Modifications are proposing a substantially New Plan which will not, in itself, be the subject of a Local Plan Examination, arriving some 9 months after the Examination took place.

In such circumstances and in accord with the March 2021 Procedure Guide for Local Plan Examinations, it is inevitable that "further hearing sessions" will need to be held because this is "essential in the interests of fairness or in order to clarify or resolve substantial new issues arising from the representations".

Ravenswood **Environmental Group**



Given that we are asked to accept this New Plan, it follows that the Inspectors must accept that it is not possible to make it sound and legally compliant by making main modifications to it. The New Plan is so different to the Submission Plan the definition of what constitutes a "modification" is being stretched to an inevitable breaking point.

Yours faithfully,

On Behalf of the Ravenswood Environmental Group

[26769]

Core Strategy and Policies Development Plan Document (DPD) Main Modifications

Object MM17 - Page 41, Policy ISPA4

Respondent: **Rushmere St Andrew Parish Council (Parish Clerk) [2422]**

Received: **23/09/2021 via Web**

Rushmere St Andrew Parish Council would request reference to not only a protective buffer between settlements but also a protected buffer between the development and Tuddenham Lane and Severn Cottage Lane and that access is not provided from these lanes. The mentioned lanes are in the process of being designated as quiet lanes.

Reference should be included in the policy to the need for a footpath that links Humber Doucy Lane and Tuddenham Road.

Changes to plan: Rushmere St Andrew Parish Council would request reference to not only a protective buffer between settlements but also a protected buffer between the development and Tuddenham Lane and Severn Cottage Lane and that access is not provided from these lanes. The mentioned lanes are in the process of being designated as quiet lanes. Reference should be included in the policy to the need for a footpath that links Humber Doucy Lane and Tuddenham Road.

Document is legal

Document is not sound

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

S



Save Our country Spaces 23/09/21

SOCS feel that the main modifications and corrections fail to make meet the Sustainability tests required to make the plan Sound, Compliant and Justified.

SOCS draw attention to an omission [Ipswich Borough Council Local Plan Review 2018-2036 Examination](#)

During the Local Plan Enquiry in Public, I requested the following A4 page page to be attached to SOCs addendum; for it to be included and uploaded.

The Planning Inspectors agreed to this.

It was however this was never done.

So this oversight needs correcting and it needs to be uploaded as part of the modification.

<https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/k13.pdf>

IBC Local Plan Examination: Response to Northern Fringe Protection Group & Save Our Country Spaces Comments on Sustainability Appraisal 11/12/20

SOCS finds it tragic and ironic that the driving force for the Public Health England Air Quality Toolkit- Head of NHS Public Health England, DR Paul Cosford died in April 2021 at the age of 58 from lung cancer. He was a non smoker and keen cyclist who attributed his illness in part to air pollution exposure.



Save Our Country Spaces (SOCS) understanding of Public Health requirements which include assessment of adverse impacts on public health from poor air quality. Public Health should give input on Planning Matters involving health risks before this application can be determined. (as amended April 2017)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/213009/Public-health-role-of-local-authorities-factsheet.pdf

Role of the Director of Public Health in Local Authorities

From: [Department of Health](#) Published: 5 October 2012 Applies to: England
Describes both the statutory and non-statutory elements of the role of Director of Public Health

Part 1 of this guidance will be republished and updated in April 2013 under section 73A(7) of the NHS Act 2006 (inserted by section 30 of the Health and Social Care Act 2012) as guidance that local authorities must have regard to.

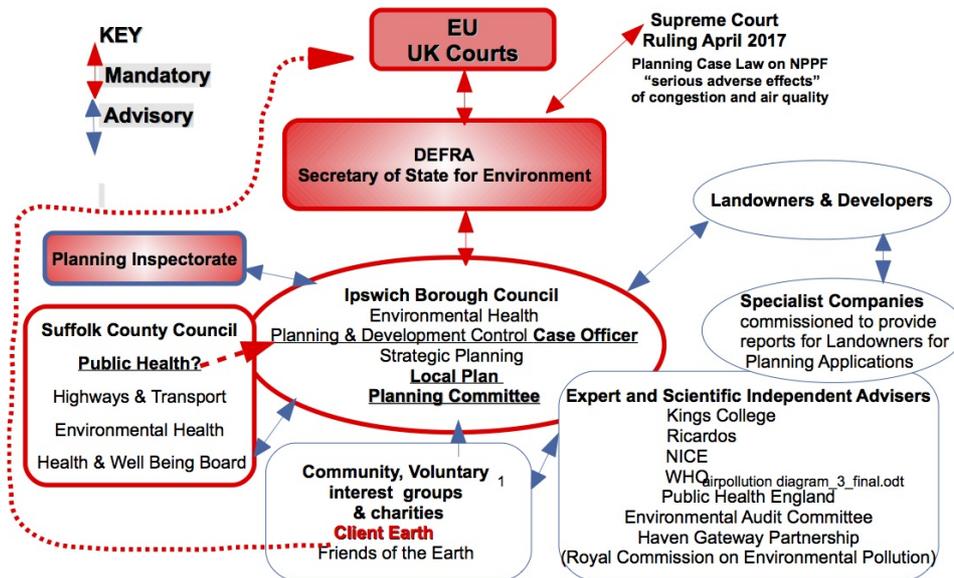
1. The DPH is a statutory chief officer of their authority and the principal adviser on all health matters to elected members and officers, with a leadership role spanning all three domains of public health: health improvement, health protection and healthcare public health.
2. 1.5 Local authorities must take the action to improve public health that they decide is appropriate – it is not the job of central government to look over their shoulders and offer unnecessary advice. Nevertheless, the statutory basis of the DPH role, its transfer to local government and the involvement of the Secretary of State mean that there is value in clear, informative guidance that establishes a shared understanding of how this vital component of the reformed system should work.

Additional considerations include ;

- **Public Health Outcomes Framework – this covers particulate matter especially pm 2.5mg** <http://www.phoutcomes.info/search/air%20quality>
- **Health Risk Impact Assessments**

Hierarchy of Mandate, Responsibility and Custodianship of Public Health to protect from risks from poor Air Quality in relation to planning determination and decision making.

The government has indicated that the decision to leave the EU will not affect the UK's commitment to meeting air quality targets.



<https://www.independent.co.uk/news/health/lung-cancer-non-smoker-air-pollution-cigarettes-public-health-england-a8886681.html>

Pollution contributing to 'thousands of lung cancers deaths in non-smokers', experts warn.

'For too long having lung cancer has only been thought of as a smoking related disease,' say Public Health England researchers calling for indoor and outdoor pollution risks to be considered seriously'

He was formerly Director of Public Health for the East of England Strategic Health Authority.

The follow needs referencing I regard to Air Quality.

Published 17 March 2020 - Last updated 26 March 2021

- <https://www.gov.uk/government/publications/assess-the-impact-of-air-quality>
- [Air quality appraisal: impact pathways approach](#)

This especially the Public Health England Air Quality Toolkit.

- <https://laqm.defra.gov.uk/assets/63091defraairqualityguide9web.pdf>
- **Air Quality A Briefing for Directors of Public Health March 2017**

The following would be useful to reference too;

- <http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=18580>

SOCS fully support the ananalysis of the North Fringe Development Group submission which they have permission to include as part of SOCS response.

Developing communication methods for localised air quality and health impact information - AQ1010

Description

There is a need to more effectively communicate the health impacts of air pollution. Current air pollutant concentrations – though low by historic levels – are believed to hasten the deaths of tens of thousands of people in the UK from particulates, with an order of magnitude greater impact on morbidity. **Studies for DH in developing the Public Health Outcomes Framework indicate that PM2.5 is the sixth most important lever to improve public health in the UK.** (Epidemiologists continue to improve their understanding of the effects of NO2 and other pollutants, so their health impacts may yet be quantified.)

There is a clear public health case for local action on air quality. Unitary and upper tier local authorities now have a duty to take steps to improve the health of people in their local areas. This new duty, together with the inclusion of the PM2.5 indicator in the Public Health Outcomes Framework, creates an excellent opportunity for that case to be made more effectively within local authorities and communities. Specifically, the reform of public health services means that Directors of Public Health (DPHs) have the potential to become key local champions of air quality improvement, by informing and influencing their peers in local transport, planning, sustainability and other departments, and by getting the message out to the general public.

To realise the potential for DPHs to act as local champions of air quality improvement, the Authority wishes to develop a communications Toolkit (with associated recommendations). The Toolkit has an important enabling role to play in a deeper cultural shift in the approaches taken by Local Authorities to air quality reduction: from a passive regulatory stance to one of active stakeholder engagement.

Objective

The aim of this project is to develop a set of recommendations and a communications Toolkit that can be used effectively to communicate the health effects of air pollution at a local level so that cost-effective local action on air pollution reduction is taken.

It must:

- enable the Authority and key national partners to raise awareness among DPHs of the health impacts of air pollution, and ensure that this evidence is properly used in local decision-making and prioritisation;
- enable and encourage DPHs to repeat this process with other local decision-makers, so they become champions within Local Authorities for air quality actions, such as those in Air Quality Action Plans
- enable and encourage DPHs and other local decision-makers to communicate the health impacts of air pollution to the general public (drawing on existing communications channels and expertise), to ensure acceptance of air quality related measures and promote behaviour change where necessary.

Project Documents

- **FRP - Final Report** : [AQ1010 Final Project Report](#) (555k)
- **OTH - Other** : [Directors of Public Health Air Quality Toolkit](#) (1085k)
- **TRP - Technical Report** : [AQ1010 Public Workshops Report](#) (364k)

Time-Scale and Cost

From: 2013

To: 2014

Contractor / Funded Organisations

[Par Hill Research Ltd](#)

Keywords

[Environmental policy](#)

Fields of Study

[Air Quality](#)

SOCS & NORTHERN FRINGE PROTECTION GROUP (with permission from NFPG)

Safeguarding the Character of Ipswich

Please find the attached comments on the Proposed Main Modifications to the Core Strategy and Policies Development Plan Document. Whilst we still have concerns on other parts of the Core Strategy, we have limited our comments to sections on Air Quality, as we strongly believe that our concerns have not been adequately addressed in the main modifications proposed by IBC. In specific relation to air quality issues, we do not believe that the Plan has been positively prepared.

In our view, the following main modifications are not sufficient for the Plan to be found to be sound and will not result in legal compliance. We believe that further modifications are justified and required for the Plan to be effective and consistent with national policy in relation to air quality.

For ease of reference the following text in black is taken from the proposed Main Modification version of the Plan and our comments are provided in blue.

MM3 Paragraph 6.8 Amend paragraph 6.8, Objective 5 to read as follows: '5. AIR QUALITY AND CLIMATE CHANGE - Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.'

NPPF Paragraph 186 states that "Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement"

The proposed modification still fails to include an objective for AIR QUALITY "to contribute towards compliance with relevant limit values" as required under the NPPF (and legally binding air quality legislation). The proposed modification is therefore neither effective, nor consistent with national policy. We suggest that IBC should ensure compliance with legally binding targets by 2024, which would be 16 years since the publication of IBC's first Air Quality Action Plan in 2008; and consistent with IBC's current Air Quality Action Plan 2019-2024. The AQAP should have been designed to ensure compliance with legally binding limit values for it to have been approved by Councillors as fit for purpose; so there is no reason why 2024 should not be included in the Plan. If 2024 is not accepted by IBC, then it clearly illustrates that the current AQAP is inadequate and needs to be urgently revised to ensure compliance.

Therefore MM3 needs to be further amended to read:

"Every development should contribute to the aim of compliance with relevant air quality limit values for pollutants in Ipswich by 2024 (by eradicating AQMAs)".

This is justified as it would help prevent further un-necessary deaths and instances of respiratory illness in Ipswich.

MM77 Paragraph 9.3.1 Amend Paragraph 9.3.1 to read as follows: ‘The focus of Policy DM3 is to mitigate the impact of development on air quality and to ensure exposure to poor air quality is

¹ [Ipswich Air Quality Action Plan 2008](#)

1

reduced in the Borough, to contribute towards achieving compliance with air quality limit values for pollutants.’

The proposed modification MM77 is insufficient and needs to include a compliance date to be effective and consistent with national policy. We advocate that this is set at end 2023. Without a target date Policy DM3 cannot possibly be effective. We note that paragraph a) repeated below references that Development proposals should not “delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits”. Consequently a date for compliance must be included in the Plan, otherwise how will compliance with this requirement be assessed?

MM77 therefore should be amended to read

“... ... to contribute towards achieving compliance with air quality limit values for pollutants by end 2023.”

POLICY DM3: Air Quality

The Council will ensure that the impact of development on air quality is mitigated and ensure that proposals do not negatively impact on existing air quality levels in the Borough. The Council will take into account the impact of air quality when assessing development proposals, through consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Development proposals should not: a) create any new areas that exceed air quality limits or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; b) reduce air quality benefits that result from the Borough Council’s activities to improve air quality; and c) create unacceptable risk of exposure to high levels of poor air quality, for example, through having a negative impact on an existing AQMA. An Air Quality Assessment (AQA) will be required where development proposals are likely to expose residents to unacceptable levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact. Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan. Development should be consistent with the actions identified in the Council’s Air Quality Action Plan, where appropriate.

MM99 Policy DM21 Amend Policy DM21: Transport and Access to New Developments, to read as follows:

‘POLICY DM21: Transport and Access to New Developments To promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall:

b. not result in a significant detrimental impact on air quality or an Air Quality Management Area and shall address the appropriate mitigation measures as required through in accordance with Ppolicy DM3.

To be consistent with Policy DM3, MM99 also needs to make it clear that there should not be any

“*negative impact*” on, and around, existing AQMAs from new development or the exceedances of legally binding limit values anywhere in Ipswich. We also note that there is no definition of

“significant” and suggest that this needs to be deleted. To be effective and consistent with national policy MM99 needs to be revised and we suggest the following, which is more consistent with Policy DM3.

“shall:

b. not result in:

2

1. 2. 3.

MM143 Objective 5 Amend Objective 5: Air Quality, to read as follows: ‘OBJECTIVE 5: AIR QUALITY AND CLIMATE CHANGE

Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.

INDICATOR(S)

Per Capita CO2 emissions in the local authority area.

Local authority CO2 emissions. Local authority air pollution data.

Number and extent of designated AQMAs.

NOx concentrations measured through AQMA data and DEFRA returns.

TARGETS

To reduce the level of identified air pollutants in the National Air Quality Strategy.

To reduce the extent of AQMAs by 2036 in accordance with the corporate Air Quality Action Plan Review (Council Target).

The reference to “the corporate Air Quality Action Plan Review (Council Target)” should be removed as a) this Review is not in the public domain and b) has not been agreed so it is therefore not yet a Council target. We strongly object to the proposed 2036 date as this will result in further unnecessary deaths and cases of respiratory illness in Ipswich. It is clearly not effective, justified, or consistent with national policy to continue to allow illegal air quality levels in Ipswich for another 25 years. It clearly illustrates that IBC is not taking its air quality duties seriously.

We note that since its first Air Quality Action Plan in 2008, IBC has failed to improve air quality in Ipswich and the number of AQMAs has been increased from the initial three AQMAs.

We also note that this target could be achieved by reducing just one of existing AQMAs by just 1m². The Executive Summary of IBC’s current Air Quality Action 2019-2024 states that “Ipswich Borough Council is committed to reducing the exposure of people in Ipswich to poor air quality in order to improve health.” This target is therefore inconsistent with IBC’s own AQAP as it illustrates no real commitment to reducing the exposure of people in Ipswich to poor air quality. It is clearly worthless and needs to be replaced with a target that will ensure compliance with UK air quality legislation and NPPF paragraph 186. MM143 should be revised to read

OBJECTIVE 5: AIR QUALITY AND CLIMATE CHANGE

Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels and to contribute towards achieving compliance with air quality limit values for pollutants by 2024.”.

INDICATOR(S)

Local authority CO2 emissions. Local authority air pollution data.

Number and extent of designated AQMAs.

NOx and particulate concentrations measured through AQMA data and DEFRA returns. TARGETS
To eradicate all AQMAs and comply with UK limit values for air pollutants by 2024.

Unfortunately, as currently drafted, this illustrates the lack of ambition the Council has in improving air quality in Ipswich. It would also appear that the Council has little intention of trying to eradicate illegal air pollution any time soon and demonstrates why the Local Plan must impose a target on the

any detrimental impact on air quality in and around the existing AQMAs,

the creation of any new AQMAs,

a detrimental impact on air quality elsewhere in Ipswich that is likely to result in a

negative impact on health.”

3

Council to comply with legally binding UK air quality targets for it to be sound, effective, and consistent with national policy.

8.241 There are particular concerns about highway capacity within the Star Lane area of Ipswich Town Centre, as this impacts on east-west vehicle movements and pedestrian connectivity between the central shopping area and the Waterfront. These capacity implications are closely linked to issues associated with the wider transport network – including the A14 and the Orwell Bridge. There are, in addition, five Air Quality Management Areas (AQMAs) within the central area of Ipswich, as a result of pollutants from road traffic. Air Quality Management Areas are designated in areas where poor air quality may have an effect on people’s health.

9.3.2 Ipswich has 5 Air Quality Management Areas (AQMAs) and therefore developers must give careful consideration to the air quality impacts of their proposed development. Plan 7 identifies the 5 AQMAs in Ipswich.

On behalf of the Northern Fringe Protection Group 17th September 2021

Other modifications required for correction purposes

In addition, the following paragraphs and Plan 7 need to be corrected as IBC now has four declared AQMAs following The Executive meeting on 10th August 2021 (see draft minutes at **Executive draft minutes 10th August 2021**).

4

22nd September 2021
Our Ref: 21.6018

15 De Grey Square
De Grey Road
Colchester
Essex
CO4 5YQ

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
Ipswich IP1 2DE

T
F

Dear Sir/Madam,

Re: Ipswich Local Plan Review 2018-2036 Proposed Main Modifications – Response on behalf of Seven Group

The following representations are made on behalf of Seven Group, specifically in relation to land within it's ownership to the east and west of Turret Lane, Ipswich. This land forms a significant portion of site allocation IP054b, in respect of which these representations are therefore made.

This land forms part of Seven Group's wider ownership in the area, principally in the form of its established headquarters at 35-37 St Peter's Street.

My client has recently acquired the land either side of Turret Lane, but is aware that the former landowner (Mr Norman Agran – Rep ID 26319) had made representations at previous stages of the Local Plan preparation and examination process, including specifically a hearing statement relating to Matter 6 of the EIP. In wishing to ensure that the site can support growth of their business operations Seven Group is therefore keen to comment constructively on these latest developments in the emerging Local Plan.

The representations set out below therefore relate to the following Main Modifications:

- MM297 – New Policy - Land between Old Cattle Market and Star Lane (IP054b);
- PMC29 – Changes to Proposals Map;
- MM298 – New supporting text relating to this site/policy;
- MM261 – Amendments to Policy SP15.

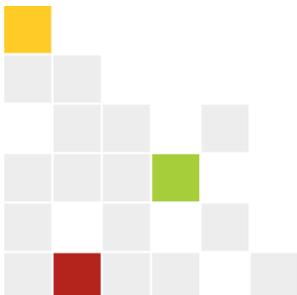
Collectively it is noted that the following captures, in summary, the nature of these changes:

“PMC29/MM297

Change: IP054b Moved from Policy SP2 to New Policy – Land between Old Cattle Market and Star Lane (IP054b)

Reason: To reflect New Policy – Land between Old Cattle Market and Star Lane (IP054b).”

The Submission version of the Local Plan identified site IP054b as land allocated for residential use (Policy SP2). Within the Main Modifications it is now proposed to be covered by a New Policy (IP054b) and shown on the Policies map as land allocated for mixed residential, employment, small scale retail uses and the electricity sub station.



The apparent change from a residential-led allocation to a more balanced mixed use approach is supported by Seven Group.

New Policy - Land between Old Cattle Market and Star Lane (IP054b) as proposed through the Main Modifications is now a criteria based policy which contains a significant number of prescriptive requirements.

The criteria appear to be drawn largely from, although notably expand upon, the details contained within the "Site Sheets" contained within Appendix 3 of the Submission plan, although with some further elements taken from other policies of the plan, as applied to the site. In the case of the former, the increased status of this information, which is now proposed to represent "Policy" as distinct from informative guidance, at this late stage in the plan making process is of concern.

A series of specific comments and objections, with associated elaboration on these general points, is set out below under each Modification.

MM297 – New Policy - Land between Old Cattle Market and Star Lane (IP054b)

We very much welcome and support the more balanced mixed use approach to the site allocation contained within this modification, and note that this is in line with the representations made by the previous land owner. Whilst the Submission draft Proposals Map had previously referred only to Residential Use, it is acknowledged that the SP2 allocations table had referred to small scale retail and leisure uses alongside the primary residential use.

Regarding this more explicitly as a mixed use site allocation is considered to be more appropriate, as too is the range of uses now referred to, most notably through inclusion of employment uses in this context.

Furthermore, reference to the new Use Class E is welcomed in bringing the policy up to date, and providing greater flexibility to future occupiers, which is considered to be in line with Government's intentions for introducing this wider ranging commercial use class. This should help to secure long-term use of the site, ensuring increased occupancy and activity levels along Turret lane, consistent with the objectives of improving the pedestrian environment as a consequence.

That said, however, we object to the intended residential element being referred to as the primary use. Given the bulk and scale of some of the existing buildings present on the allocation site as a whole, it is felt that achievement of the indicative target capacity of 40 dwellings could be secured on a relatively small portion of the site, meaning that this would not necessarily represent the primary use.

As such we would request that reference to 60% residential coverage and to residential being the primary use be deleted.

As noted above we also object to inclusion of detail previously within site sheet as detailed criteria at this late stage in the Local Plan process. It is of concern, as a matter of principle, that information previously contained as guidance or information within the Site Sheets is now proposed to be included as "Policy" through this Main Modifications process. This is on the basis that this would now have increased status in the decision making process relative to its previous presentation within an Appendix.

Whilst in some instances the presentation of requirements covered by other existing policies of the plan within this single site allocation policy is helpful, in other respects these are overly prescriptive, or would be onerous if applied as blanket requirements without having specific regard to the scale and nature of proposals being submitted.

An example of this is the requirement under criteria a. for flood risk assessment for any development proposals, or under criteria d. for archaeological assessment. A preferred approach would be to note that in all instances a degree of discretion will be applied, in accordance with the acknowledgement under criteria c. for instance, that Heritage Impact Assessment will be required on a proportionate basis.

In respect of criteria n. it should be clarified that S106 contributions will apply to residential development proposals, as distinct from uses within the other commercial use class allowed for, unless this is considered to be adequately covered by reference to the term “as appropriate.”

PMC29 – Changes to Proposals Map

Consistent with the comments set out above we support the more balanced mixed use approach to the site allocation contained within this modification to the proposals map, including reference to employment uses.

MM298 – New supporting text relating to this site/policy

It is noted that much of the text included in the proposed supporting text to this new policy has been drawn from the relevant Site Sheet previously contained within Appendix 3 of the Submission Plan. On this basis we have no objection to this, and consider that this provides generally helpful commentary.

Within the fourth new paragraph of supporting text it is noted that reference is made to the need for introduction of a landmark building at the corner of Star Lane and Turret Lane, highlighting the adjacent cylindrical building at the junction of Star Lane and St Peter’s Street as an example of best practice in this regard. As this forms part of Seven Group’s existing premises they are naturally pleased that it has been referred to in this context, and hopefully provides comfort and reassurance of their track record and willingness to work with Ipswich Borough Council to bring forward high quality development within this part of the town.

MM261 – Amendments to Policy SP15

It is noted that reference is made within this proposed modification to the support that will be given to improving the pedestrian environment on key walking routes from the Waterfront to the Central Shopping Area, including along Turret Lane. We have no objection to this strengthening of the north-south axis in this manner and consider that developments that will increase activity levels in the area whilst improving the visual appearance of the streetscene and safeguarding the existing alignment of routes through Turret Lane should support this objective.

It is trusted that the comments set out above are clear, and can be taken into consideration ahead of the plan being finalised for adoption. However should any further clarification or explanation be required, please do not hesitate to contact me.

Yours sincerely

Matt Clarke
Director, Head of Boyer Colchester

Boyer

Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
Document Main Modifications
Sustainability Appraisal of Main Modifications
Habitats Regulations Assessment of Main Modifications

Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

29th July 2021 (9.00am) – 23rd September 2021(11.45pm)

Consultation website: <https://ipswich.oc2.uk/>
Website: www.ipswich.gov.uk/mainmodifications
Email: planningpolicy@ipswich.gov.uk

Phone: 01473 432019

Council address:

Planning Policy
Planning and Development
Ipswich Borough Council
Grafton House, 15-17 Russell Road
Ipswich IP1 2DE



Please return to:	planningpolicy@ipswich.gov.uk Planning Policy Planning and Development Ipswich Borough Council Grafton House, 15-17 Russell Road Ipswich IP1 2DE
Return by:	23rd September 2021 11.45 pm
This form has two parts:	Part A – Personal details
	Part B – Your representation(s).

PART A Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title		Mr
First name		Matt
Last name		Clarke
Job title <i>(where relevant)</i>	Property Director and General Manager	Director, Head of Boyer Colchester
Organisation <i>(where relevant)</i>	Seven Group	Boyer
Address <i>Please include post code</i>	c/o Agent	
E-mail	c/o Agent	
Telephone No.		

Signature: **Date: ...23rd September 2021.....**

Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details

* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation <i>(and client if you are an agent):</i>	Matt Clarke, Boyer on behalf of Seven Group
--	---

Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
MM297 / PMC29	
MM298	
MM261	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	N/A
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	N/A
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	N/A

5. Do you consider the proposed Main Modification is:

		Please tick		Please tick
5. (1) Legally compliant	Yes	X	No	
5. (2) Sound	Yes		No	X

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

<input type="checkbox"/>	It would not be positively prepared
<input checked="" type="checkbox"/>	It would not be justified
<input checked="" type="checkbox"/>	It would not be effective
<input type="checkbox"/>	It would not be consistent with national policy

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

Please see accompanying letter.

(continue on a separate sheet / expand box if necessary)

Please provide a concise summary of your representation here (up to 100 words):

Seven Group supports the more balanced mixed use approach to the site allocation contained within MM297 – New Policy - Land between Old Cattle Market and Star Lane (IP054b), including reference to employment amongst the range of uses. Regarding residential use as the primary use is objected to.

Introduction of information from the site sheets into the policy criteria is of concern, particularly where this is overly prescriptive. It should be clarified that all elements will be applied on a proportionate basis.

It is welcomed that Seven Group's cylindrical building has been highlighted as an example of best practice as a landmark building.

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

Please see accompanying letter.

(continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.



SUFFOLK CONSTABULARY

Landmark House, 4 Egerton Road, Ipswich, Suffolk, IP1 5PF

Telephone: 101 or 999 in an emergency Fax: 01473 613534

Calls may be monitored for quality control, security and training purposes.

Your Ref: Ipswich Local Plan Review
Modification consultation

Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
Suffolk
IP1 2DE

15 September 2021

Dear

Ipswich Local Plan Review - Main Modifications Consultation

Thank you for inviting consultation on the Ipswich Local Plan review.

Policy CS11: Gypsy and Traveller Accommodation

It is understood that Ipswich Borough Council has a duty under national government policy to identify suitable sites for Gypsy and Traveller Accommodation. However, it is noted that the Gypsy, Traveller, Travelling Show people and Boat Dwellers Accommodation Needs Assessment identified 'strong evidence' of the preference in the Gypsy and Traveller Community locally for smaller pitches for family groups. Previous correspondence from Suffolk Constabulary has expressed the view that new sites should not exceed 20 pitches. Whilst the revised plan only identifies the need for an additional 13 pitches, adding those to the current 42 pitches at West Meadows would take the total pitch number to over 50.

Therefore, taking both matters into account, it is recommended that the policy is re-worded to reflect the priority of identifying, and evidencing that research, smaller sites, with expansion at West Meadows being an alternative option only if more suitable smaller sites cannot be found.

Objective 11- tackling deprivation and inequalities across the town

It is noted that one of the targets to evidence compliance with this objective is that the impact of designing out crime on anti-social behaviour statistics to reduce by a minimum of 25% by 2036 (from 2020 baseline).

Suffolk Constabulary will continue to work closely with Ipswich Borough Council to identify opportunities to design out crime at the planning stage. However, in order for this target to be realistic and achievable, clear definition of the parameters should be identified. For example: which statistics (including definitions of ASB) will be used to determine this target; how will the impact of the lockdowns during 2020 be reflected; how will population growth be factored into consideration and how will it be determined if 'designing out crime' has led to a decrease in anti-social behaviour?



A more measurable and defined target may be to ensure that all planning applications for Major Projects are submitted to Suffolk Constabulary for comment and acting on concerns raised. This would then ensure that IBC are tackling all crime types in partnership, not simply those related to ASB, this would create a safer, more cohesive town.

Yours sincerely,

Superintendent

Southern Area Policing Command



From:
Sent: 03 September 2021 11:24
To: PlanningPolicy
Cc:
Subject: West Meadows
Attachments: bennt1_19-08-2021_11-31-35.pdf

Dear Sirs,

I refer to your letter of 28th July (copy attached) , which has only recently reached me, regarding a proposal to increase the number of pitches within the West Meadows site. As you may be aware SCC is no longer the owner of the WM site, which was sold to a management company owned by the residents, it does however retain a roadside strip of land across the frontage (with which to protect future use). It is our belief that the current rights of way over the roadside strip, as currently enjoyed by the residents, are adequate to support additional pitches (i.e. SCC can prevent change of use but not intensification). I do not, therefore, believe there are any comments SCC would wish to make on the proposal in its capacity as landowner. It is, however, possible that my colleagues in other directorates of SCC may wish to comment from a planning or community perspective and, if they do, I have drawn their attention to the deadline for submissions of 23rd September.

regards

Senior Manager Corporate Property
Endeavour House
8 Russel Road, Ipswich, IP1 2BX

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content
may be read.

For information about what we do with personal data see our privacy notice
<https://www.suffolk.gov.uk/about/privacy-notice/>

Date: 23rd September 2021
Enquiries to:
Tel:
Email:



Dear

Ipswich Borough Council Local Plan Main Modifications Consultation

Thank you for consulting Suffolk County Council (SCC) on the main modification for the Ipswich Local Plan.

This response has been written in reference to agreed positions between the County Council and the Borough Council in Statements of Common Ground drafted prior to examination hearings, however it is noted that there are a number of new policies and SCC will also provide comment on these where appropriate.

Proposed amendments will show deleted text in ~~strike through~~ and added text in *italics*.

New Site Allocation Policies

It is noted that the site allocation document has been reformatted so that site allocations and their full list of constraints have been brought into policy. This approach is supported. Below, comment will be provided on policies SCC believes require amendment.

New Policy For ISPA4.1

In general SCC supports this policy, however it requires an amendment. In the Statement of common ground between IBC and SCC, the authorities agreed to include information on archaeology and a requirement to assess this site. The information has been included in a new paragraph, which is welcome, however there is not requirement for archaeological evaluation within the policy itself. In order for this part of the plan to be sound and consistent with the policy for the East Suffolk part of the site in the Suffolk Coastal Local Plan, a requirement for archaeological assessment should be included in the policy.

New Policy Sites off Nacton Road, South Ravenswood

SCC supports this policy, but suggests a change for clarity. The policy explains that parts of the Ravenswood allocations are in the Minerals Consultation Area, however does not explain the significance of this. The purpose of safeguarding mineral resources (in this instance sand and gravel) is to prevent them from becoming permanently unusable. Therefore, developments sites over a certain size (5ha) where there may be usable mineral resources should assess the quality and quantity of the mineral to determine whether some of that mineral can be used in the construction of the development. The following amendment is proposed to clarify the policy.

xiv. Sites IP150b and IP152 are over 5ha and fall within the Minerals Consultation Area *and applications should be accompanied with an assessment of the quality and quantity of sand and gravel resources on site to determine if some of this mineral can be used in the construction of the development;*

It would also be helpful if relevant policies in the Suffolk Minerals and Waste Local Plan were identified in explanatory text to the policy: Policy MP10 Minerals Consultation and Safeguarding Areas.

New Opportunity Area Policies

Policies which detail how development should approach the opportunity areas are supported with some amendments proposed. In particular the opportunity areas should also include the possibility for the development of community facilities to meet the needs of residential development. Specifically, SCC is mindful of the deficit of early years education places in the town centre and waterfront areas, recognised in the Statement of Common Ground between the County and Borough Councils

Opportunity Area A

The first section of the policy should include community facilities as part of the acceptable mix of uses to meet the needs of the residential population. This would make the policy consistent with the allocation for site IP037, which includes a requirement for early years facilities, as well as help to address the deficit in early years provision in the area.

Due to the close proximity of the area to sites safeguarded in the minerals and waste local plan, the second section of the plan should include the requirement "*Have regard to nearby uses safeguarded in Suffolk minerals and waste planning policy.*"

Opportunity Area B

Similar to opportunity area A, it would be helpful to include community uses to meet the needs of residents, such as early years facilities.

Opportunity Area C

Part f of this policy should be amended to "*school and early years education*" to help meet the deficit of early years places in the area.

Opportunity Area E

Similar to opportunity area A, it would be helpful to include community uses to meet the needs of residents, such as early years facilities.

Opportunity Area F

Part d of this policy should be amended to: Residential *and community* uses where appropriate within mixed use developments adjacent to the river.

Opportunity Area G

Part a of this policy should be amended to: Residential *and community* uses where appropriate within mixed use developments adjacent to the river.

Due to the close proximity of the area to sites safeguarded in the minerals and waste local plan, the second section of the plan should include the requirement "*Have regard to nearby uses safeguarded in Suffolk minerals and waste planning policy.*"

Opportunity Area H

Due to the close proximity of the area to sites safeguarded in the minerals and waste local plan, the second section of the plan should include the requirement "*Have regard to nearby uses safeguarded in Suffolk minerals and waste planning policy.*"

Gypsie Traveller Site Allocation IP400

It is noted that site IP400 is a new site added to meet the needs of Gypsies and Travellers and that IBC consulted SCC directly as landowners and the Corporate Property department has responded directly. Their response has been included as an appendix, for completeness.

In addition to comments from SCC corporate property we would like to raise the following.

Expanding an already established site provides a simple solution to meet the need to find appropriate land for this type of housing. It also could give an opportunity to integrating new families or families who would struggle to find a plot to live on by themselves.

However this is not in line with the previous experience of the County Council. In our experience the more successful Traveller communities are usually smaller with the same families on them or close friends. It is our understanding that this is their preferred way of life as many do not necessarily like living amongst other gypsy or travellers in large groups. In larger mixed groups there are usually the more dominant families who try to exert control over a site, which means distrust and conflict amongst the rest of the families or even fear.

Suffolk County Council's view is that careful consideration should be given and mitigations put in place if the expansion is to include families who are not closely linked to the existing residents.

Education

Early Years

The inclusion of the early years setting in policy IP037 is welcome, however in order to be clear about the requirements of the site it is recommended that the policy specify the land area for the early years requirement. Table 80 identifies that 90 places should be provided on this site. SCC would request, 1292.7m² or 0.13ha (rounded up).

The New Policy for the Mint Quarter includes does not include the early years setting associated with the primary school, which is recognised in Table 8a, is not included in the policy. For completeness the policy should be amended to state: "Mint Quarter/Cox Lane East Regeneration Area facing Carr Street (IP048d): 0.43ha for a primary school *and early years provision*"

Minerals and Waste Planning Policy

The main modifications have included most of the agreed additions set out in the SoCG between SCC and IBC with regards to minerals and waste, which is welcome. However, there are some sites near safeguarded facilities which have not been acknowledged, or there are inconsistencies of policy wording between sites. In order to be clear and unambiguous to developers and decision makers these issues are highlighted and amendments suggested

Site Allocation Policy IP003

In part 'b' of this policy, it is recommended that the word "retention" is replaced with the word "safeguarding". This would make the language of the policy more in line with chapter 17 of the NPPF and the Suffolk Minerals and Waste Local Plan

Site Allocation Policy IP004

The current wording of part i of this policy is: "The site is close to uses which are safeguarded through the Suffolk Waste and Minerals Local Plan (2020)". While this does highlight the relationship it does not explain the significance of being near a safeguarded site, or what may be expected of developers and decision makers because of it.

For consistency and clarity it is recommended that the wording in other policies near to safeguarded minerals and waste sites is used, which is: *“The site allocation is within 250m of a safeguarded waste use site and concrete batching plant in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the minerals and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby facilities”*

While the safeguarded sites near to IP004 are part of IP003, and will require relocation when IP003 is redeveloped, safeguarding will still be a material consideration in planning decisions while the waste and concrete batching site are operational.

Site Allocation Policy IP037

The policy acknowledges there is a relationship with safeguarded waste sites. However, while this does highlight the relationship it does not explain the significance of being near a safeguarded site, or what may be expected of developers and decision makers because of it.

For consistency and clarity it is recommended that the wording in other policies near to safeguarded minerals and waste sites is used, which is: *“The site allocation is within 250m of a safeguarded waste use site, a railhead and wharves in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the mineral and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facilities”*

Site Allocation Policy IP080

The policy acknowledges there is a relationship with safeguarded a safeguarded minerals site. However, while this does highlight the relationship it does not explain the significance of being near a safeguarded site, or what may be expected of developers and decision makers because of it.

For consistency and clarity it is recommended that the wording in other policies near to safeguarded minerals and waste sites is used, which is: *“The site allocation is within 250m of a safeguarded railhead and wharves in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the mineral and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facilities”*

Site Allocation Policies IP119, IP120b and IP279

These site allocation policies do not recognise two safeguarded minerals and waste sites within 250 meters. These policies should contain the following text.

“The site allocation is within 250m of a safeguarded waste use site and concrete batching plant in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the minerals and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby facilities”

While the safeguarded sites near to these allocated sites are part of IP003, and will require relocation when IP003 is redeveloped, safeguarding will still be a material consideration in planning decisions while the waste and concrete batching site are operational.

Transport

Policy CS5

The aim of 15% modal shift in this policy is very welcome.

Thresholds for Transport Assessments and Transport Statements

It is noted that thresholds for transport statements and transport assessments has been updated to align with new use class order. It is also appears that the thresholds match the guidance in SCCs travel plan guidance in order to align TAs, TSs and TP's which is supported. The TP Guidance has not yet been updated to reflect the new Use Class Order, however SCC would appreciate discussion with IBC before the policy is finalised to ensure that both organisations are aligned in the approach to using the thresholds.

Policy SP16 Transport Proposals in the IP-One Area

Modifications to this policy are supported

Policy SP17 Town Centre Car Parking In the IP-One Area

Modifications to this policy are in line with what is agreed in statements of common ground between the Borough and County Councils and is and is supported.

New Policy For Sustainable Transport Outside of IP1 Area

SCC supports this policy, but suggests there could be some improvements. Reference to adopted cycling and walking infrastructure strategies of both the councils could be mentioned in the policy, not just the explanatory text, and projects contributing to the Transport Mitigation Strategy for ISPA.

The second paragraph could also make reference to improving the quality of PRow themselves, as well as linkages to them. Below are suggested amendments

“The Council will seek opportunities to deliver specific sustainable travel infrastructure improvements outside the IP-One Area through safeguarding sites/routes where necessary, new developments and/or seeking funding opportunities. *In particular opportunities will be sought to deliver routes that implement the Ipswich Cycling Strategy, Suffolk County Council Walking and Cycling Infrastructure Plan and The Transport Mitigation Strategy for the Ipswich Strategic Planning Area.*”

Throughout the Borough, development should improve linkages to *and quality of* the *public* rights of way network, including cross boundary links, where opportunities exist to do so.”

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. As previously mentioned the County Council is willing to discuss anything raised in this response.

Yours sincerely,

Senior Planning and Growth Officer
Growth, Highways, and Infrastructure

Appendix 1: Message from SCC Corporate Property on proposed extension to West Meadows Travellers site.

“Dear Sirs,

I refer to your letter of 28th July (copy attached) , which has only recently reached me, regarding a proposal to increase the number of pitches within the West Meadows site.

As you may be aware SCC is no longer the owner of the WM site, which was sold to a management company owned by the residents, it does however retain a roadside strip of land across the frontage (with which to protect future use).

It is our belief that the current rights of way over the roadside strip, as currently enjoyed by the residents, are adequate to support additional pitches (i.e. SCC can prevent change of use but not intensification).

I do not, therefore, believe there are any comments SCC would wish to make on the proposal in its capacity as landowner. It is, however, possible that my colleagues in other directorates of SCC may wish to comment from a planning or community perspective and, if they do, I have drawn their attention to the deadline for submissions of 23rd September.

regards

Senior Manager Corporate Property

Representations made in accordance with Regulation
22 - In Alphabetical Order

Full Redacted Representations

T

From:
Sent: 22 September 2021 17:03
To: PlanningPolicy
Subject: Local Plan IP131

EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe.

Dear Sir/Madam

Re. Local Plan Review concerning the allocated area IP131

I am the owner of the residential freehold property * part of which appears to be included in the above Local Plan allocated area (IP131)

The concreted area beyond the garden of * is my parking area which has vehicular access from Milton Street and is an integral part of my freehold property. I have plans to apply to construct a double garage on it. I was surprised to find it included in a plan for possible alternative development.

The commercial area begins beyond the second (security) fence and not the wooden garden fence at the end of my property (as shown on the plan). I have no objection to the re-development of the commercial land for domestic dwellings.

I naturally object strongly to the inclusion of part of my property in the Local Plan for possible re-development, especially as it would deprive me of a very valuable parking facility. I expect that, if informed, the owner of the neighbouring property will also object as he/she will be similarly disadvantaged.

I assume that an oversight has occurred in the drawing up of the plan. Please ensure that the plan boundary is altered to exclude the domestic property described.

I found out about this matter today by reading a small notice stuck to a lamp post and, with only one day's notice before the deadline, I have not had time to consult widely upon this matter. Please keep me informed of future developments by e-mail and please acknowledge receipt of this e-mail.

Kind regards,

Sent from my iPad

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This submission is **unconfirmed**

[26670]

Core Strategy and Polices Development Plan Document (DPD) Main Modifications

Comment MM145 - Page 209, Objective 7

Respondent: **Theatres Trust (Mr Tom Clarke MRTPI, National Planning Adviser) [278]**

Received: **13/08/2021 via Web**

The Trust is supportive of this modification to improve the plan's effectiveness and the policy's justification, setting ambition to grow visitors to the Corn Exchange and Regent by 10%.

Document legality not specified

Document soundness not specified

Document duty to cooperate not specified