

Ipswich Local Plan

Proposed Submission Core Strategy and Policies Development Plan Document Review

**Pre-submission Consultation Statement,
November 2014**

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Proposed Submission Core Strategy and Policies Development Plan Document Review

Pre-submission Consultation Statement, November 2014

1 Introduction

- 1.1 Ipswich Borough Council approved the proposed submission Core Strategy and Policies development plan document review for Ipswich on 19th November 2014, hereinafter referred to as the 'Core Strategy review'. This is a key development plan document forming part of the Ipswich Local Plan.
- 1.2 Before the Council submits the Core Strategy review to the Secretary of State, it has to comply with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. One of the requirements of Regulation 19 is that the Council must publish a statement setting out:
- (i) Which organisations and individuals have been invited to have involvement in the preparation of the plan;
 - (ii) How they were invited to make their representations;
 - (iii) A summary of the main issues raised; and
 - (iv) How those issues have been taken into account.
- 1.3 This Pre-submission Consultation Statement addresses the requirement of Regulation 19 in relation to the proposed submission Core Strategy and Policies development plan document review.
- 1.4 The local plan system is built on a principle of 'front loading' in plan preparation, to involve stakeholders from the earliest stages. The National Planning Policy Framework (March 2012) states:
- Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.*
- 1.5 The soundness of the Core Strategy and Policies document review will be judged against whether it has been prepared in accordance with the Regulations and the Council's own Statement of Community Involvement, in relation to involving people.
- 1.6 The Council is committed to ensuring that the views of the community are taken into account as far as possible in the Local Plan. The Statement of Community Involvement for Ipswich was adopted in September 2007 and a subsequent review was adopted in March 2014 and sets out the approaches the Council will use to engage people in plan preparation.

2 Outline of the Core Strategy review preparation process in Ipswich

- 2.1 The Core Strategy and Policies development plan document was adopted in December 2011 after preparation of the document commenced in 2005. The Inspector's Report on the Examination into this document concluded that a review of the Core Strategy commence in 2012/13.

- 2.2 The Council's Local Development Scheme (July 2012) introduced the Core Strategy review and outlined a timetable for its preparation. The commencement of the Core Strategy review was further announced in the Council's Local Plan newsletter 6 in February 2013 alongside a 'Call for Ideas' consultation in February and March 2013, in accordance with the Council's Statement of Community Involvement for Ipswich (September 2007).
- 2.3 A revised Local Development Scheme was published in July 2013 and a draft Core Strategy review was approved at the Council's Executive Committee in October 2013 for public consultation (Regulation 18 of the 2012 Regulations). An eight-week public consultation was undertaken between 13th January and 10th March 2014.
- 2.4 A Statement of Community Involvement (SCI) for Ipswich review, which consolidated and improved the September 2007 version, was adopted in March 2014. The SCI sets out how the community will be involved in plan making. The Council must comply with the SCI in enabling involvement in all local development documents. A further Local Development Scheme was published in September 2014.
- 2.5 This Pre-submission Consultation Statement relates only to the proposed submission Core Strategy and Policies development plan document review.
- 2.6 The following sections will explain, stage by stage, who was invited to be involved, and how. They will outline the main issues raised by respondents and how they have been taken into account.

3 Call for Ideas

Who was consulted, how and when?

- 3.1 The Council gave notice in public of the Core Strategy review in its Ipswich Local Plan newsletter number 6 in February 2013. This was sent to all those on the Council's Local Plan mailing list and was published on the Council's website. The newsletter invited views on what areas of the Core Strategy and Policies development plan document should be reviewed to be received over four weeks by 14th March 2013.
- 3.2 The newsletter summarised that the review was commencing in particular to revisit housing and employment growth targets following the abolition of the East of England Plan (May 2008), which occurred in January 2013. Therefore particular focus was on policies CS7: The Amount Housing Required, CS10: Ipswich Northern Fringe, CS13: Planning for Jobs Growth and CS17: Delivering Infrastructure.
- 3.2 The Council also announced that it was reviewing the evidence that underpinned the housing and employment growth targets and was extending the Core Strategy plan period to 2031. In respect of the Ipswich Northern Fringe (now known as Ipswich Garden Suburb) it was mentioned that a development brief supplementary planning document (SPD) was currently being produced (more detail on which was given in the newsletter), and that the review of policy CS10 was to formally allocate an area for development that is greater than what was already allocated in the adopted Core Strategy. The principle of development at the Ipswich Garden Suburb had been determined through the Core Strategy Examination however the total number of dwellings and the appropriate phasing was to be determined through the review.
- 3.3 In addition the Council announced in the newsletter that it would be revisiting the development management policies in light of the publication of the NPPF. The

adopted Core Strategy was compliant with the NPPF however there were references to documents including the East of England Plan, Planning Policy Statements and Planning Policy Guidance, which needed to be deleted.

- 3.4 Four responses were received to this 'Call for ideas'. Three were in connection with the proposed Northern Fringe (Ipswich Garden Suburb) development and the effect that reviewing the housing and employment growth targets will have on the Ipswich Northern Fringe and delivering infrastructure. One was in respect of planning policy for traveller sites.
- 3.5 Cross-boundary working with neighbouring authorities was supported with a comment that housing and employment targets should be set through the Ipswich Policy Area and divided among the local authorities through agreement. It was also mentioned that a realistic job target should be balanced with the new homes to be built and that these homes should be on brownfield land. It was also suggested that agricultural land should be protected. Cross-boundary working on infrastructure is particularly important on transport, water and healthcare. Sustainability appraisals need to be undertaken and a full review of these once the Core Strategy review has been completed prior to any greenfield development outline planning applications being processed.
- 3.6 The comment in respect of traveller site provision wanted to ensure that both the Core Strategy review and the Site Allocations plan meet the requirements set out in the Planning Policy for Traveller Sites in that they are based on an objective and robust Gypsy and Traveller Needs Assessment, they set pitch targets that meet the permanent and transit accommodation needs of Gypsies and Travellers, and they identify a five year rolling land supply for Traveller sites.
- 3.7 In response the Council stated it is working with neighbouring local authorities and Suffolk County Council to address sub-regional housing and employment targets, as well as Gypsy and Traveller provision.
- 3.8 The population and household modelling has been undertaken with agreement from neighbouring local authorities and with support from the County Council. Infrastructure delivery is being considered sub-regionally with support from the County Council, and the Northern Fringe area development brief (Ipswich Garden Suburb) supplementary planning document focuses in particular on infrastructure delivery for this area.
- 3.9 In response to the balance between jobs growth and housing growth, these are not able to be balanced in the current economic climate as the increase in population as evidenced through the objectively assessed housing need is far greater than the number of jobs that can be created in the Borough. The Council supported the creation of up to 12,500 jobs for Ipswich between 2011 and 2031 identified through the East of England Forecasting model while recognising that some of these jobs may be accommodated within the Ipswich Policy Area adjacent to the Borough boundary.
- 3.10 Sustainability appraisals were to be undertaken for each stage of the review and were published to inform public consultation in 2014.
- 3.11 A Gypsy and Traveller Accommodation Assessment for five local planning authorities in Suffolk (Ipswich, Babergh, Mid Suffolk, Suffolk Coastal and Waveney) in partnership with Suffolk County Council will inform provision in the wider Ipswich

area. In respect of Ipswich, policy CS11 in the Core Strategy and policy DM41 in the Site Allocations DPD address the requirement to meet Gypsy and Traveller need.

4 Draft Pre-Submission Stage ('Regulation 18' stage under the 2012 Regulations)

Who was consulted, how, and when?

- 4.1 The draft pre-submission stage in Ipswich followed an initial 'Call for ideas' and was on a Core Strategy focused review, as at that stage it was felt that only parts of the document should be reviewed, particularly housing need, the Ipswich Garden Suburb allocation, the employment target and infrastructure. An eight week public consultation was undertaken between 13th January and 10th March 2014. Comments were invited by:
- Publishing consultation documents and comment forms for the Core Strategy and Policies review;
 - Writing to all specific and general consultation bodies;
 - Writing to all people on the Council's Local Plan mailing list;
 - Writing to those bodies prescribed by the duty to co-operate;
 - Placing a public notice in the East Anglian Daily Times and Ipswich Star;
 - Placing all relevant documentation on the Council's website, at its main offices, the Council's Customer Services Centre and in libraries;
 - Holding ten drop in events at five venues including the Town Hall alongside consultation on the Ipswich Garden Suburb supplementary planning document at various dates and times including evenings and weekends;
 - Attending five Area Committee meetings and giving a presentation;
 - Attending meetings with stakeholders; and
 - Placing a planning feature in the Council's Newspaper, the Angle, delivered to households in Ipswich.
- 4.2 A summary of the representations is shown in Appendix 1. The main issues raised included a stronger emphasis on the role of the Port of Ipswich, improving air quality, prioritising brownfield sites for housing, widen the central shopping area to include the waterfront, emphasis on the archaeological importance and heritage assets of the town, focus on sub-regional planning through the Ipswich Policy Area, a reduction in the retail floorspace to be sought, and more flexible uses on employment sites.
- 4.3 In addition the objectively assessed housing need (13,550 dwellings) was also questioned with some arguing for a lower figure due to the low delivery of jobs historically and the need for a balance between jobs and housing, and one representation arguing for a figure closer to 20,000 dwellings. The realistic delivery of the 12,500 jobs target was questioned.
- 4.4 The need for houses at the Ipswich Garden Suburb was questioned together with the impact on traffic and air pollution as well as the loss of agricultural land. It was felt too much emphasis is being placed on walking and cycling from the proposed development.
- 4.5 In response a greater emphasis on the Port of Ipswich is included within the text of the document although the Port has its own planning responsibilities.
- 4.6 Air quality is recognised as an issue for Ipswich with four air quality management areas in the town. The latest revision to the local development scheme in September 2014 introduces a low emissions strategy supplementary planning document and an

Ipswich Cycling Strategy supplementary planning document to further encourage modal shift to non-motorised forms of travel and address air quality concerns.

- 4.7 Brownfield sites are prioritised for housing, however in the context of the NPPF deliverability needs to be taken into consideration to ensure the Council can maintain a five-year supply of housing land or be as close as possible to do this requirement. Therefore the release of land for housing at the Ipswich Garden Suburb is required alongside the brownfield sites to meet the objectively assessed housing need and subsequently the five-year housing land supply.
- 4.8 It is not suggested to widen the central shopping area to include the waterfront as the main retail uses should be focused in the centre of the town centre area. The retail floorspace sought is in accordance with that advised by the Council's recent town centre opportunity area appraisal study.
- 4.9 The archaeological importance of Ipswich and the heritage assets of the town will be further emphasised in the text of the document.
- 4.10 The requirement for more flexible uses on employment sites is not supported where employment sites are identified as being key to the delivery in the region of 12,500 jobs in policy CS13. The jobs target has been informed by up-to-date evidence.
- 4.11 Following the public consultation between January and March 2014, the Council changed the emphasis of the Core Strategy review from a focused review to a whole plan review following legal advice received by the Council, as the focused review went beyond the scope of focused changes.

5 Conclusion

- 5.1 The Council has a significant objectively assessed housing need to accommodate where possible in Ipswich, which has necessitated some difficult decisions about how that need should be distributed and planned for. In addition it is necessary to ensure the Council has an appropriate job target to ensure economic growth in the Borough. In preparing the Core Strategy and Policies review, the Council has greatly valued the input received from all respondents.
- 5.2 The Council is committed to public involvement in the preparation of its Local Plan and has made efforts to ensure that people have been both informed of the key opportunities for involvement, and able to participate, for example by using a mixture of approaches and techniques. This Statement of Pre-Submission Consultation has set out the key approaches used, who has been invited to take part, what response they have made and how the comments have been taken into account.
- 5.3 The Council considers that the approach taken has complied with Regulatory requirements and with the adopted SCI and its subsequent review.

Appendix 1: Summary of Comments to Draft Core Strategy and Policies development plan document focused review (Jan-Mar 2014)

Comment	Source	Ipswich Borough Council response	Action required
Chapter 1: Introduction			
Diagram 1: should make reference to NHS England (NHSE), NHS Property Services Ltd (NHSPS) as well as Ipswich & East Suffolk Clinical Commissioning Group.	Lawson Planning Partnership Ltd	Will amend Diagram 1 accordingly.	Add NHS England (NHSE) and NHS Property Services Ltd (NHSPS) to the box containing Ipswich and east Suffolk Clinical Commissioning Group.
The proposed changes go beyond a 'focused review', and in effect is a full review. Therefore all policies need assessment based on evidence and must be made in consistence with the National Planning Policy Framework (NPPF).	Mersea Homes Limited	In light of recent examinations elsewhere where the extent of focused reviews have been called into question by planning inspectors, the Council has received legal advice that it would be more effective to proceed with a full review. The evidence is in place to inform the changes proposed in this document and will continue to be reviewed prior to submission of the document to the Government.	Change the emphasis from a focused review to a full review and ensure the evidence base is as up-to-date as is reasonably practical.
Chapter 2: The Planning System			
The NPPF requires local planning authorities to use their evidence base to ensure that their planning policies meet the full objectively assessed needs for market and affordable housing in the housing market area including identifying which sites are critical to the delivery of the housing strategy over the plan period to 2031.	Crest Strategic Projects	The Council has assessed its objectively assessed housing need using a population and demographic model called 'PopGroup' which is owned by the Local Government Association. Through this model, the Council has been able to test scenarios and using a trend population change scenario has established the objectively assessed housing need.	None.

		<p>A Strategic Housing Market Assessment (SHMA) was published for the Ipswich housing market area in August 2012.</p> <p>The Council has identified sites through the Core Strategy review and the Site Allocations plan to meet the full objectively assessed need as far as possible, with the requirement to work closely with neighbouring authorities to meet the need in the latter part of the plan period.</p>	
<p>The Core Strategy and its sustainability appraisal must take account of revisions to the NPPF relating to flood risk; plan soundness where land growth in years 11-15 is not identified; windfalls over the whole plan period; inclusion of student and older persons accommodation in assessing housing need; provision of infrastructure to support development and this as a constraint; importance of developing brownfield sites; clarification on refusing development on grounds of prematurity in relation to draft plans.</p>	<p>Northern Fringe Protection Group</p>	<p>The NPPF does not change the approach of the Core Strategy review.</p> <p>Policy DM4 in respect of development and flood risk is in line with the NPPF.</p>	<p>Add in reference to the National Planning Practice Guidance (NPPG) in chapter 2 of the Core Strategy review.</p>

Chapter 3: The Local Enterprise Partnership			
<p>In addition to supporting the Suffolk Growth Strategy and the New Anglia Local Enterprise Partnership (NALEP) it is important to focus on top growth sectors in Ipswich which are different. The Core Strategy must make this clear in order to translate this into both the Ipswich Economic Strategy and the Ipswich Economic Development Strategy Implementation Plan. Business Service, Professional & Technical Services and Health & Care are the sectors that do not appear to be adequately reflected.</p>	<p>Northern Fringe Protection Group</p>	<p>Agree the focus in on top growth sectors in Ipswich in addition to those mentioned in the Suffolk Growth Strategy and the NALEP Strategic Economic Plan.</p>	<p>Add in the key sectors in Ipswich to chapter 3.</p>
<p>Concern over the change in direction away from a jobs-led strategy. The NPPF is clear that development should be sustainable with a need for employment centres to continue their role to provide for employment opportunities. This requires the Core Strategy to take a much more positive approach to jobs provision including taking every sustainable opportunity to provide employment land within the borough. For sustainable development, jobs and housing growth must be in balance in close proximity with good sustainable transport links. Neither more unemployed residents nor residents working outside the borough are considered to be sustainable. A housing-led strategy means the proposed Garden Suburb with new jobs in the town centre reached by bus, bike or on foot is no longer sustainable.</p>	<p>Babergh District Council / Mid Suffolk District Council, Northern Fringe Protection Group</p>	<p>The strategy is focused on delivering jobs as set out in policy CS13 while recognising the need to deliver housing to meet Ipswich's objectively-assessed housing need set out in policy CS7 in accordance with the NPPF.</p> <p>Ipswich town centre continues to be a focus for employment and future jobs growth, which is located within two miles of the whole of the proposed Ipswich Garden Suburb. Employment generating uses will also be provided in the Ipswich Garden Suburb including education and retail.</p>	<p>None.</p>

Chapter 5: Ipswich – The Place			
The description of Ipswich should make appropriate reference to Ipswich Port at Cliff Quay, which represents one of the single largest concentrations of employment land in the borough and its important role should be clearly emphasised.	Lafarge Tarmac	Port and logistics is one of the main growth sectors in Ipswich.	Add text to paragraph 5.6 emphasising Ipswich has a significant port.
Disagree that Ipswich residents possess a wide range of skills as elsewhere the Core Strategy acknowledges low skills and educational achievement in the workforce as identified in the Suffolk Growth Strategy.	Northern Fringe Protection Group	Ipswich does possess a wide range of skills while it is recognised there are areas of deprivation and low educational attainment. The Greater Ipswich City Deal sets out the growth potential for jobs in Greater Ipswich through addressing low skills levels.	None.
The Core Strategy should support the night time economy further. The Waterfront night time economy has generally been a success partly at the expense of the historic town centre.	Northern Fringe Protection Group	The supporting text to policy CS2 regarding the location and nature of development supports the night time economy. The leisure market has a key role in its delivery.	None.
Do not agree Ipswich has strong transport links, the evidence being lobbying of the Government to improve the local rail network and journey times to London and increasing congestion on the A12 and A14. The Core Strategy should acknowledge this too. There are concerns that the Travel Ipswich scheme has not slowed traffic down and the Core Strategy should reflect this view and doubts over whether traffic lights should replace roundabouts. Increased housing will only increase congestion.	Northern Fringe Protection Group	Ipswich does have good transport links by road and rail although there are capacity issues on the network. Travel Ipswich is not yet complete and Suffolk County Council is the highway authority on this matter. Walking, cycling and public transport enhancements will encourage less car use to address potential congestion.	Acknowledge there are capacity issues on the road and rail network in paragraph 5.8.

<p>While population has increased, numbers in employment have fallen showing over reliance on national based models without consideration of local issues. Latest data (NOMIS Oct 12-Sep 13 and East of England Forecasting Model (EEFM) Aug 13) should be included. Also need to recognise fall in average salaries.</p>	<p>Northern Fringe Protection Group</p>	<p>Data from the EEFM in 2013 and 2014 will inform the next iteration of the Core Strategy review. The jobs target remains in the region of 12,500 jobs between 2011 and 2031. Average wages are outside the scope of planning.</p>	<p>Include reference to the EEFM 2013 and 2014 runs.</p>
<p>Concerned that expansion of University Campus Suffolk (UCS) is slowing with cuts in staff to be made. Welcome initiatives that have been made that suggest more support is required for UCS in light of a drop in employment in education figures in Ipswich.</p>	<p>Northern Fringe Protection Group</p>	<p>The Greater Ipswich City Deal supports the development of UCS and innovation clusters. The Council's Site Allocations plan allocates sites for university-related uses.</p>	<p>None.</p>
<p>Amend paragraph 5.20 to read: 'Ipswich is a large town of great historic and archaeological importance, with origins in the 7th Century.'</p>	<p>Suffolk County Council</p>	<p>Will add in text.</p>	<p>Text to be amended.</p>
<p>The Core Strategy needs to acknowledge deprivation and fails to consider the implications of a shift to a housing-led not employment-led strategy with more people chasing fewer jobs on lower salaries resulting in deprivation. The Core Strategy needs to focus on getting people into work.</p> <p>The Peace Index shows Ipswich as one of the worst rated locations in the Eastern England and this is linked to levels of income, employment, health, education and housing.</p>	<p>Northern Fringe Protection Group</p>	<p>The Greater Ipswich City Deal sets out the growth potential for jobs through addressing low skills levels. The Core Strategy is focused on the delivery of jobs as set out in policy CS13. It is recognised that 'a number' of wards within Ipswich are considered to be in bottom 20% most deprived nationally. It is not clear what data sits behind analysis used in the Peace Index.</p>	<p>None.</p>

<p>One of the key challenges over the extended plan period should also be to: 'Protect and support appropriately located industrial activity, in particular at Ipswich Port'.</p>	<p>Lafarge Tarmac</p>	<p>Policy DM25 relates to the protection of employment land. The Port has its own planning powers and there is a need for urban regeneration in Ipswich.</p>	<p>None.</p>
<p>A key challenge identifies to accommodate growth in a way that enhances Ipswich's character and resident's quality of life. Consider that the Northern Fringe development is an essential part of the strategy for growth, to deliver high quality residential accommodation within a sustainable new community which will integrate with existing urban form whilst creating its own unique identity. Its delivery will be a key solution to this challenge.</p>	<p>Crest Strategic Projects</p>	<p>None.</p>	<p>None.</p>
<p>The key challenges fail to mention what growth is taking place. The past decade has seen housing and population growth without jobs growth. Core Strategy needs to clarify that there is 'forecast growth' in both population and the economy and not treat this as an undisputed fact. Core Strategy needs to recognise the relative poor performance of some schools in the league tables in order to help raise standards.</p>	<p>Northern Fringe Protection Group</p>	<p>Agree growth is a forecast and not a fact of what has happened. The forecasts are based on government guidance and planning for the future is based on forecasts. The challenges section refers to growth but it is not appropriate to go into detail here, which is provided for in the later relevant chapters. Whilst the Core Strategy can help to ensure that there is sufficient schools provision in the locations where they are needed, the performance of the schools themselves is largely beyond the scope of the planning system.</p>	<p>None.</p>

Chapter 6: Vision and Objectives			
<p>Little reference is made in the vision to the historic environment. Paragraph 126 of the NPPF requires local plans to set out a positive strategy for the conservation and enhancement of the historic environment.</p> <p>Recommend additional bullet point included stating the special historic and townscape character of Ipswich shall be protected and enhanced to reinforce the local distinctiveness and attractiveness of the town.</p>	English Heritage	It is considered that conserving and enhancing the historic environment is integral to each strand of the vision and this can be clarified in the introductory paragraphs to the vision.	Amend the introductory paragraphs of the vision to refer to 'conserving and enhancing' Ipswich's historic character.
Homes-led expansion risks worsening lives. Give greater priority to developments that improve the lives of existing residents through raising educational standards, getting people into work and revitalising the town centre. More focus needed on tackling traffic congestion; improving poor health and levels of physical activity; improving private rented housing stock; kick-starting regeneration at the waterfront.	Private individual, Northern Fringe Protection Group, Private individuals (538)	The Core Strategy review and the Site Allocations plan identify land including at the waterfront for new schools and development of the university, for employment, housing and leisure uses. Travel Ipswich focuses on tackling traffic congestion and improving physical activity. Existing private rented housing stock is outside the scope of planning.	None.
Make reference to the important role of Ipswich Port, which is a key asset for the Borough. The distinct nature of the port employment area and the specific industrial activities which take place on the Cliff Quay site are not appropriately covered by the designation 'Major Employment Area'.	Lafarge Tarmac	The employment sites around Cliff Quay may include non-port related uses.	None.

<p>Support vision that land will start to come forward for development at the Northern Fringe, in conjunction with essential infrastructure. Welcome deletion of text that tied a development start date to the latter part of the plan period. Support policy that does not restrict start dates and subsequent development phasing.</p>	<p>Crest Strategic Projects</p>	<p>None.</p>	<p>None.</p>
<p>The objectives should help contribute towards a positive strategy for the historic environment including archaeology and townscape character in accordance NPPF.</p> <p>Recommend objective 8 is amended to read "...and protect and enhance the historic environment of Ipswich, including historic buildings, archaeology and townscape/landscape character."</p>	<p>English Heritage</p>	<p>Amend text.</p>	<p>Objective 8 to be amended as per English Heritage's suggestion.</p>
<p>Inconsistencies in car parking policy. The Site Allocations plan assumes Bury Road Park & Ride will reopen whilst the Core Strategy deletes reference to new Park & Ride.</p> <p>IP-One proposals expand car parking capacity. This is inconsistent with more walking / cycling / bussing / P&R and the need is also queried. Access and cost are issues for car parking. Believe surplus long term parking could become short-term. Increased parking must be assessed in terms of impact on air quality.</p>	<p>Northern Fringe Protection Group</p>	<p>The Park & Ride which is no longer referred to was the previous proposed allocation off Nacton Road although the Council will investigate some form of park and ride facility in this area. The Bury Road site already exists albeit it is currently closed.</p> <p>No new long-term parking is proposed or permitted in the central car parking core.</p>	<p>None.</p>

<p>Completing the regeneration of the waterfront should be given greater prominence in the vision and the Council must make maximum possible use of brownfield sites in accordance with the NPPF.</p> <p>The new reference to additional short-stay parking to support shopping/tourism in the town centre is understandable but the vision should be broader and include e.g. better information and improved linkages between the centre and surrounding car parks. The car parking policy and allocations also need to support Travel Ipswich. The vision should aim to improve the town's health and wellbeing.</p>	<p>Suffolk County Council</p>	<p>Agree to make more reference to the Waterfront.</p>	<p>Add in reference to the Waterfront in paragraph 6.7 regarding the vision.</p>
<p>Key role provided by Ipswich Port should also be reflected in the vision and plan objectives as well as in paragraph 6.19.</p>	<p>Lafarge Tarmac</p>	<p>Will amend text in paragraph 6.19.</p>	<p>Amend text to recognise the key role provided by Ipswich Port.</p>
<p>Plan has failed to demonstrate the duty to co-operate with neighbouring local authorities to deal with the apparent short fall in housing supply in both Suffolk Coastal and Mid-Suffolk district. In addition the 2012 SHMA indicates unmet housing need in Ipswich, but unlike the other authorities Ipswich has not based its forecast on the SHMA. All four Ipswich Policy Area authorities should draw up a co-ordinated plan for housing need taking into account unmet need in London and Essex because of forecast jobs growth which could not be met from the local population alone.</p>	<p>Home Builders Federation</p>	<p>The Duty to co-operate statement of compliance to be published alongside the Regulation 19 document and not the earlier draft. Housing need is discussed among Ipswich Borough Council and neighbouring authorities as demonstrated through the Ipswich Policy Area and joint working including the 2012 SHMA. Future needs later in the plan period to be addressed through further joint work. Unmet need in London and Essex does not alter the housing need for Ipswich significantly.</p>	<p>Publish draft Duty to co-operate statement of compliance alongside the Regulation 19 document.</p>

<p>Although Objective 3 reduces the number of new homes, it remains an ambitious delivery target, which will only be met through brownfield and greenfield development. The plan needs to be sufficiently flexible to not unnecessarily restrict when these sites can come forward.</p> <p>Regarding Objective 4, Crest would welcome the inclusion on the key diagram of the three planned centres at the Northern Fringe. It is important to present a full picture of the spatial distribution and hierarchy of existing and planned centres.</p> <p>In Objective 7, the flood barrier should be a requirement rather than a 'should have'.</p>	<p>Crest Strategic Projects</p>	<p>The plan while prioritising the delivery of brownfield sites does not restrict the development of appropriate greenfield sites that are necessary to address the objectively assessed housing need.</p> <p>The key diagram identifies the development of the Ipswich Garden Suburb at present. The Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014) identifies the location of proposed uses in greater detail, this level of detail is not necessary in the Core Strategy.</p> <p>Will amend text regarding the flood barrier.</p>	<p>Amend text from 'should be' to 'be'.</p>
<p>Jobs growth target should be altered by deleting the words 'up to' at bullet 3b and elsewhere so it reads '12,500 additional jobs shall be provided'. The figure will need amending in light of the most up to date forecasts. The Core Strategy should be employment-led, not housing-led.</p>	<p>Northern Fringe Protection Group</p>	<p>Will amend text to 'in the region of 12,500 jobs' and this figure will continue to be informed by the most up-to-date evidence available at the time of preparation.</p>	<p>Amend text from 'up to' to 'in the region of'.</p>
<p>13,550 new houses unachievable within the Borough and relies on windfalls and neighbouring authorities. Population and household forecasts should be revised in light of DCLG 2011 data and latest ONS and EEFM data using 2011 Census. Trend migration data is flawed as migrants are attracted to higher wage areas with jobs, unlike Ipswich.</p>	<p>Northern Fringe Protection Group</p>	<p>13,550 new homes is the objectively assessed housing need for Ipswich Borough within the Ipswich housing market area. The most recent DCLG 2011 data is based on a recessionary trend and therefore presents a lower figure than that assessed through the Council's population and household modelling,</p>	<p>None.</p>

<p>The loss of the target for development of previously developed land will result in greenfield development and failure to regenerate deprived areas. 'Larger' sites should be defined. Favour a specific minimum jobs target based on newer data e.g. from 2011 Census.</p>		<p>which accounts for growth and the recession. Jobs are not the only reason for the movement of people. Brownfield and greenfield sites are both required to meet the objectively assessed housing need.</p>	
<p>Largest area of development is the Northern Fringe and this is outside the IP-One area. This needs to be corrected.</p>	<p>Northern Fringe Protection Group</p>	<p>Will amend text to reflect this.</p>	<p>Amend text to note significance of the Ipswich Garden Suburb alongside the IP-One area.</p>
<p>Objective 3: The Council must make the maximum possible use of brownfield sites. The reuse of previously development land is a core planning principle and should be reflected in the vision. The loss of the 60% target should not prejudice the overall aim.</p> <p>Objective 6: The aspiration for an enhanced public transport system does not need to refer to guided bus. Standard buses are more flexible and, without a specific proposal, the reference to guided bus is unnecessary.</p> <p>Objective 11: Improving air quality should be included as an objective related to improving health.</p>	<p>Suffolk County Council</p> <p>Suffolk County Council</p> <p>Suffolk County Council</p>	<p>Whilst a specific target has been removed from the vision, policy CS9 maintains the policy approach in relation to a preference for brownfield development.</p> <p>As guided buses were included as an example only, removal of this reference would seem sensible in light of these comments.</p> <p>It is agreed that improving air quality should be included.</p>	<p>None.</p> <p>Reference to guided buses has been deleted.</p> <p>Reference to improving air quality has been included.</p>
<p>In respect of paragraphs 6.12 and 6.17, by allowing multiple starts across the entire Northern Fringe for housing development and removing the target to develop brownfield sites there will be a major detrimental impact on regeneration of brownfield sites in deprived areas.</p>	<p>Northern Fringe Protection Group</p>	<p>The objectively assessed housing need for Ipswich cannot be met through the delivery of brownfield sites alone and it is therefore necessary for development to come forward at Ipswich Garden Suburb alongside the development of</p>	<p>None.</p>

Developers will focus on new housing on greenfield sites as it is cheaper and easier for them to do so. Priority should be to develop brownfield sites, especially those in more deprived areas, which is a far more sustainable approach. As drafted the Core Strategy will fail to regenerate such areas.		brownfield sites.	
Paragraph 6.17 refers to expansion at the Northern Fringe, but needs to be expanded for additional locations for growth for the remaining housing requirement not otherwise accounted for.	Planning and Development Ltd on behalf of Kesgrave Covenant Ltd	Policy CS7 identifies the need to work with adjoining planning authorities to address need later in the plan period and to highlight this position earlier in the document this could also be referred to in Policy CS2.	Amend policy CS2 to include reference to 'Later in the plan period, working with neighbouring authorities to address housing need within the Ipswich housing market area'.
In respect of paragraph 6.17, Crest agrees that the combination of the Northern Fringe alongside all of the residential development opportunities in central Ipswich is the only way to ensure that the Borough's housing target can be met.	Crest Strategic Projects	None.	None.
Agree that the Central shopping area boundary should be redefined for example to extend to the Waterfront but also believe that other rundown parts of the Central shopping area can be regenerated far better through the provision of new homes. Question the demand/need for a new Westgate shopping centre.	Northern Fringe Protection Group	The 2013 Appraisal of Ipswich Town Centre Opportunity Areas study by DTZ indicates that the Ipswich central area can support retail development at the Westgate site. The Mint Quarter allocation includes housing.	None.
Whilst supporting jobs growth through the Economic Development Implementation Plan, Suffolk County Council and Suffolk Growth Strategy, notice that central Ipswich is not included as a principal location within it; within Ipswich, only the	Northern Fringe Protection Group	Policy CS13 sets out the key sectors identified in the Suffolk Growth Strategy, including the finance and insurance sector.	None.

<p>A14 / Ravenswood / Futura Park / Ransomes Europark site which is not easily accessible from the proposed Garden Suburb by public transport or other sustainable transport means is mentioned. The Suffolk Growth Strategy identified Finance / Insurance as a growth industry for Ipswich and this should be mentioned in the Core Strategy even though the predicted growth for 2011-2031 from EEFM 2013 data is only 428 jobs (7%).</p>			
<p>Chapter 7: The Key Diagram</p> <p>Key diagram needs to show additional locations for longer term growth required for the delivery of the remaining housing requirement not otherwise accounted for. The key diagram shows the 'green rim' around the edge of Ipswich, but the extent of that green rim will need to take into account the decisions that need to be made in respect of the additional growth locations.</p> <p>An amended key diagram would show a location for housing post 2026 on the north-eastern side of Ipswich. An urban extension in this location could deliver more homes if it were to straddle the Ipswich/Suffolk Coastal boundary, and shows that development in this location need not affect either the Tuddenham Road Green Corridor or the function of the outer Green Rim.</p>	<p>Planning and Development Ltd on behalf of Kesgrave Covenant Ltd</p>	<p>The Core Strategy identifies a need to work with adjoining authorities to address housing need later in the plan period. The area referred to would need to be considered as part of this process.</p>	<p>None.</p>

<p>It is not clear why the key diagram depicts a relatively constrained area within the town centre as “Conservation of Historic Core”, given that the historic core of Ipswich goes beyond this area and includes places such as the Waterfront. It implies that the historic environment beyond this constrained area may not be conserved.</p>	<p>English Heritage</p>	<p>It is agreed that the historic core is wider than currently shown and the key diagram should therefore be amended.</p>	<p>Amend the key diagram to show the historic core as the whole of the IP-One area.</p>
<p>Crest supports the presentation of the Northern Fringe as the location of development to 2031 and welcomes the deletion of the suggestion that only limited development could take place there before 2021. This important amendment is a more positive policy and introduces suitable flexibility to allow the key supply of deliverable housing land to contribute materially to the housing target early in the plan period.</p>	<p>Crest Strategic Projects</p>	<p>None.</p>	<p>None.</p>
<p>Object to the allocation of the entire Northern Fringe for development. Urban regeneration and improving more deprived areas will be facilitated by limiting development on the Northern Fringe during the early years of the Core Strategy. Welcome recent government announcement to offer incentives for the development of brownfield sites, but believe some form of restriction should be retained to help achieve regeneration / deprivation and sustainability objectives.</p>	<p>Northern Fringe Protection Group</p>	<p>The objectively assessed housing need for Ipswich cannot be met through the delivery of brownfield sites alone and it is therefore necessary for development to come forward at Ipswich Garden Suburb alongside the development of brownfield sites.</p>	<p>None.</p>

Chapter 8: Development of the Strategy			
Para 8.1: support explicit reference to the Northern Fringe in this chapter through policy CS10, as a key source of housing land. Welcome updates to ensure consistency with the National Planning Policy Framework (NPPF); support the principles that underpin the strategy; and welcome recognition that a high amount of growth is needed. Support in principle the intentions to ensure that new development complies with high standards of environment and sustainability and agree that the plan should not be prescriptive about how developments should meet these targets. However flood risk must be properly understood and especially the consequences of delay to the barrier's delivery.	Crest Strategic Projects	The plan confirms that the new tidal flood barrier is anticipated to be installed by 2017.	None.
<i>Policy CS1: Sustainable Development – Climate Change</i>			
To address climate change, new development should be designed to improve resilience and adapt to its effects. The following should be considered and incorporated into suitable planning conditions: a Code / BREEAM pre-assessment should be submitted with applications; on resource efficiency, a reduction in the use of resources should be encouraged; on net gains for nature, ensure the development is conserving and enhancing habitats to improve biodiversity; and on sustainable energy use, the development should minimise energy	Environment Agency	It is considered that the points raised in relation to energy are covered already by policies CS1, DM1 and DM2. Water and resource efficiency are addressed through requirements in relation to the Code for Sustainable Homes and BREEAM under policy DM1. Policy DM4 relates to addressing flood risk. However it is agreed that Policy DM31 could go further in terms of seeking enhancements for biodiversity.	Revise policy DM31 to place more focus on seeking enhancements for biodiversity.

<p>demand and use decentralised and renewable technologies. It is vital to introduce water efficiency and recycling wherever practical. Landscaping proposals should maximise ecological enhancement.</p> <p>Change policy as per the above to address the threat of climate change – CS1 but possibly also DM1 and DM2.</p>			
<p>Policy should be amended to explicitly recognise that not all non-residential development can practically achieve energy and sustainability targets. The policy needs to be sufficiently flexible to avoid prejudicing employment generating uses and the construction industry. At paragraph 8.14 this necessary flexibility should also be acknowledged in the forthcoming SPD on Sustainable Construction.</p>	Lafarge Tarmac	<p>Reference to the Sustainable Construction SPD has been deleted. Policy CS1 is a strategic policy. Policy DM1 contains a caveat whereby the requirements would be relaxed if not feasible or viable.</p>	None.
<p>Para. 8.11: in order to be sustainable and be a 'comprehensive approach' as stated, policy CS1 should also include an objective to reduce carbon emissions from travel in Ipswich.</p>	Northern Fringe Protection Group	<p>It is agreed that reference to sustainable travel should be added.</p>	<p>Add a further bullet point to CS1 with reference to the Travel Ipswich target to promote 15% modal shift to reduce carbon emissions.</p>
<p>Para. 8.22: fresh water and sewage infrastructure should be included since both have previously been identified by the Haven Gateway Water Cycle Study as key issues for Ipswich and mentioned in the New Anglia Local Enterprise Partnership 2014 Strategic Economic Plan. Para. 6.92 of the latter confirms the</p>	Northern Fringe Protection Group	<p>Paragraph 8.22 of the Draft Core Strategy and Policies DPD referred to issues around fresh water and sewerage.</p>	None.

scale and cost of major new connections in relation to water supply and wastewater infrastructure (including treatment plant), is inhibiting the progress of some strategic Ipswich sites.			
<i>Policy CS2: The Location and Nature of Development</i>			
The Northern Fringe is a cornerstone of the spatial strategy, yet expressions of the spatial strategy e.g. CS2 (also paras 6.8, 6.10, 6.17, 8.28, 8.109) treat it as a subordinate element of the strategy. The Northern Fringe should be recognised as an integral and positive element of the spatial strategy and wording amended to reflect that role. Suggest rewording the spatial strategy to recognise the Northern Fringe as a critical element of Ipswich's future growth strategy.	Mersea Homes Limited	It is agreed that Ipswich Garden Suburb should be referred to in CS2 as it is a key element of the strategy.	Add reference to Ipswich Garden Suburb to criterion (a) of CS2.
CS2 (e) Remains need to identify land for offices within the Borough as the most sustainable location. Concerned that the lack of job opportunities identified in the Borough will create an imbalance between jobs and homes, causing unsustainable commuting patterns. The Core Strategy must meet NPPF obligations: ensuring enough jobs for the in-migration resulting from housing provision; and ensuring job losses are made up for in addition to the projected provision.	Babergh & Mid Suffolk District Councils	Further discussion has taken place with Babergh and Mid-Suffolk District Councils. The East of England Forecasting Model has provided the evidence for the jobs target, however further work will be undertaken on an employment needs assessment across the Ipswich Policy Area. Policy CS13 sets out the approach to supporting the provision of in the region of 12,500 jobs including through allocations and the protection of existing employment areas.	None.
Support amendment of part a). Agree that central Ipswich areas will play a key role in	Crest Strategic Projects	None.	None.

contributing to housing delivery, but maintains that the Northern Fringe will be the major contributor to the sustainable delivery of residential development and community facilities.			
CS2/8.27: The Northern Fringe is not located within easy access of new centres of employment. Residents will need to commute to employment outside the Borough or across town, as there is no direct public transport available and it is too far for most to walk or cycle. Multi-site development of the entire Northern Fringe from the outset will undermine urban regeneration efforts. CS2 directs major new retail development to the Central Shopping Area but the only development has been at Futura Park.	Northern Fringe Protection Group	The amount of housing to be delivered at the Garden Suburb could not be provided in a location closer to Ipswich town centre. The town centre is proposed to be the focus for new office and retail development. The Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (September 2014) requires provision for bus services as part of the strategic infrastructure for the development which would provide connections between the Garden Suburb and the town centre. Retail development at Futura Park was permitted as enabling development to ensure that employment uses were able to come forward on this site.	None.
Para. 8.27: the policy needs to be expanded to refer to additional locations for growth for the remaining housing requirement not otherwise accounted for.	Phase 2 Planning and Development Ltd	It is agreed that reference to meeting the remaining need should be referred to.	Amend policy CS2 to include reference to 'Later in the plan period, working with neighbouring authorities to address housing need within the Ipswich housing market area'.
Para. 8.27: policy CS2 (e) effectively deems land in Toller Road close to the waterfront within a designated employment zone in the site specific	Agent on behalf of Corindale Properties Ltd	In line with the National Planning Policy Framework, the policy approach is to focus main town centre uses, which includes offices,	None.

<p>development plan document as only suitable for B2/B8 uses, on the basis that it is outside any designated town centre area to which B1 uses should be focused for their location. This is too restrictive and ignores the lack of development of the last 10 years with such sites. The single land use concept for such sites is wrong.</p> <p>The policy needs to be made more flexible in relation to sites such as Toller Road, reinstating B1 as a potential use and accommodating schemes which are of mixed land uses but which are compatible. For example B1 office development on the ground floor with residential above.</p>		<p>into the town centre.</p>	
<p>Para. 8.27: support the principle of concentrating development in the town centre and adjoining areas, but only where it does not compromise heritage assets and the distinctive character of Ipswich. Concerns regarding the use of high densities within the town centre, Ipswich village and waterfront as this might have negative impacts on heritage assets and wonder whether such a general approach is still justified. The final sentence of policy CS2 in respect of this should be reviewed.</p>	<p>English Heritage</p>	<p>It is agreed that an element of flexibility should be incorporated into the final sentence of CS2 to cater for situations when high densities may not be as appropriate in the town centre.</p>	<p>Add the following text to the end of CS2 – ‘...where it does not compromise heritage assets and the historic character of Ipswich.’</p>
<p>Para. 8.27: in relation to policy CS2 it is recommended that new development should be within sustainable areas with a preference for development on brownfield land. With regard to density there should be flexibility to permit higher densities in some locations outside the town centre,</p>	<p>BNP Paribas Real Estate</p>	<p>Policy DM30 provides for to the approach to density where the site location, characteristics, constraints or sustainable design justify a different approach.</p>	<p>None.</p>

assessment should be made on a site by site basis.			
Para. 8.28: support the approach to prioritise brownfield sites in the town centre for housing but at odds with the stance in the Ipswich Garden Suburb supplementary planning document which suggests the Council will not be concentrating on developing brownfield sites before the arable fields of the Northern Fringe.	Private individual	The objectively assessed housing need for Ipswich cannot be met through the delivery of brownfield sites alone and it is therefore necessary for development to come forward at Ipswich Garden Suburb alongside the development of brownfield sites.	None.
Para. 8.28: the Core Strategy will fail to achieve the policy CS2 objective of urban regeneration, as residential developers will now focus on easier development at the Northern Fringe, as multi-site development is allowed from the outset. New offices and retail facilities will also favour out of town locations as at Futura Park / Ransomes. These sites have been identified as major areas for the creation of new jobs in Suffolk Growth Strategy, unlike Ipswich town centre. Support the Council's intentions to develop and regenerate the town centre and to attract new employment opportunities as indicated in the Council's Economic Development Strategy Implementation Plan.	Northern Fringe Protection Group	The objectively assessed housing need for Ipswich cannot be met through the delivery of brownfield sites alone and it is therefore necessary for development to come forward at Ipswich Garden Suburb alongside the development of brownfield sites. Policy CS2 identifies Ipswich town centre as the focus for new office development and the Central Shopping Area as the focus for new retail development.	None.
<i>Policy CS3: IP-One Area Action Plan</i>			
The policy should set out measures that support the delivery of the Wet Dock Crossing to access the island site. An agreed masterplan would appear to be an important step to delivering the crossing	Suffolk County Council	It is agreed that reference should be included in the policy to the need for additional access to the Island site.	Revise point (j) (now h) to state 'Provide a framework for the delivery of regeneration in IP-One and address the need for infrastructure, including the need

and the policies in the site allocations document.			for an additional access to the Island Site’.
Object in to the deletion in bullet b. of ‘land to provide approximately 2,000 dwellings’ in the IP-One area.	Northern Fringe Protection Group	The bullet point has been deleted as it is not necessary to identify this level of detail within the strategic policy. However, the residential allocations in the IP-One area remain albeit a number have slightly lower dwelling numbers due to potential viability issues relating to higher densities.	None.
<p>The IP-One area contains the greatest concentration of heritage assets within the town (both designated and non-designated) and is a location that requires both conservation and change. Part (f) of policy CS3 requires the area action plan (AAP) to have policies relating to conservation areas, although this should be extended to cover other heritage asset types. Given part (f) it is disappointing that the draft IP-One AAP in the Site Allocations plan makes little reference to conservation areas or any other element of the historic environment.</p> <p>Given that the NPPF requires a positive strategy for the historic environment in Local Plans, suggest that both policy CS3 and the AAP are amended to express how heritage issues will be addressed for all heritage assets (not just conservation areas).</p>	English Heritage	It is agreed that this should be broadened to refer to heritage assets. It is also agreed that further reference should be made to heritage assets as part of the Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD.	<p>Amend point (f) (now e) to state ‘Identify heritage assets which development proposals will need to have regard to’.</p> <p>Additional information has been included on the sites sheets for allocated sites where heritage assets are relevant to the site’s development.</p>

<i>Policy CS4: Protecting Our Assets</i>			
<p>Para. 8.42: the Ipswich Local Plan as a whole should be able to demonstrate that it sets out a positive strategy for the historic environment in accordance with the NPPF. Different sections of the plan should form part of the overall positive strategy, such as proposals for housing or employment development. Policies throughout the document should help deliver the conservation of the historic environment with appropriate references where necessary. Recommend the Council have local policies that protect all heritage asset types (designated and non-designated), not just conservation areas. The preparation of a supplementary planning document for the historic environment is welcomed.</p>	<p>English Heritage</p>	<p>Further discussion has taken place with English Heritage in this regard, and conserving and enhancing the historic environment has been given greater prominence in both Development Plan Documents, as referred to in relation to specific policies within this table.</p>	<p>Make various amendments accordingly.</p>
<p>Para. 8.53: amendments proposed to this paragraph and policy CS4 to add reference to the Area of Archaeological Importance. Policy CS4 should include: 1) As the Borough Council's archaeological advisor, the County archaeology service will provide comments on each site allocated for development regarding its potential to be the location for significant archaeological assets, and the likely assessment / recording requirements arising. 2) Although the policies map with the Site Allocations plan define the Area of Archaeological Importance, it is not clear from policy CS4 how the area is to be used.</p>	<p>Suffolk County Council</p>	<p>It is agreed that reference should be added in relation to the Area of Archaeological Importance.</p>	<p>Add cross reference to DM8 into CS4 which contains the development management approach to the Area of Archaeological Importance.</p>

Para. 8.53: should be amended to recognise that not all heritage assets are designated and should read: 'Proposals affecting designated and non-designated Ipswich heritage assets should be informed by the Historic Environment Record for Suffolk maintained by the County Council...' Further explanation of why the area of archaeological importance has been designated could be set out. Features in this area have been internationally recognised and the town's long history, particularly maritime, is important for sustaining the town's identity as well as marketing the town to visitors and businesses.	Suffolk County Council	It is agreed that reference should also be made to non-designated assets and that further explanation of the Area of Archaeological Importance should be included.	Amend the text to also refer to non-designated assets. Further explanation of the Area or Archaeological Importance to be included in CS4 and DM8 and the accompanying reasoned justification.
<i>Policy CS5: Improving Accessibility</i>			
Para. 8.65 Support well-designed efforts to reduce congestion in Ipswich but note that the Travel Ipswich scheme has yet to demonstrate that it will work. Concerns that traffic lights are slowing down traffic flows. The Core Strategy should commit to no further works, especially the replacement of roundabouts with traffic lights, until the system has demonstrated its effectiveness.	Northern Fringe Protection Group	Whilst the Core Strategy can support traffic management measures and the Travel Ipswich scheme, specific measures such as those outlined above are the responsibility of Suffolk County Council as Highways Authority and the Core Strategy cannot set policy in this respect.	None.
<i>Policy CS6: The Ipswich Policy Area</i>			
References that seek to defer decisions on locations for growth required within the Plan period to a future review of the Core Strategy should be deleted in favour of those locations being identified as part of this Core Strategy.	Phase 2 Planning and Development Ltd	It is not possible to identify locations beyond the Ipswich Borough boundary as these areas of land are beyond the scope of this Plan and would need to be allocated by the respective planning authorities, potentially through joint working.	None.

There should be an audit trail of co-operation between local authorities in order to assess the housing strategy.	Merchant Projects, Mersea Homes Limited	The Strategic Housing Market Assessment, which underpins the level of housing need, has been produced for the Ipswich Housing Market Area which covers Ipswich Borough and the three adjoining Districts. Co-operation between Ipswich Borough Council and the adjoining authorities is detailed in the Duty to Co-operate Statement.	None.
Must make clear that a joint DPD requires agreement with the districts. Policy CS6 and CS7 must be realistic about what can be delivered especially regards constraints and the resources available to prescribed bodies.	Babergh & Mid Suffolk District Councils	Agree a joint DPD requirements agreement with the districts. Will note in the future this is to be explored.	Amend text to note the preparation of joint or aligned development plan documents in the future to be explored.
The IPA Board should meet more frequently than once a year. Greater co-operation and working together between authorities is required to identify and deliver the best employment and housing sites across the area – joint plans may be appropriate. To be sustainable the location of new homes must be near to the location of new jobs. The CS6 policy and text need to commit to closer working with neighbouring authorities, e.g. to align jobs forecasts.	Northern Fringe Protection Group	Policy CS6 identifies the potential for the production of joint plans and as part of this process the relationship between the location of jobs and housing would be considered. Further work will be undertaken on an employment needs assessment across the Ipswich Policy Area.	None.
The County Council will continue to support the borough and district councils in considering matters affecting future development in and around Ipswich.	Suffolk County Council	None.	None.
Para. 8.69: refers to membership of the IPA Board but implies whole districts being included within the IPA. The correct IPA	Babergh & Mid Suffolk District Councils	Reference to the IPA Board is included within 8.69, however it is agreed that clarification should be	Amend text to clarify through reference to the IPA consisting of 'parts of the three adjoining

area should be mentioned as well as the IPA Board membership.		provided in relation to the area covered.	districts. Include reference to the IPA map in appendix 3.
Para. 8.73: references that seek to defer decisions on locations for growth required within the plan period to a future review of the Core Strategy should be deleted in favour of those locations being identified as part of this Core Strategy. Paras. 8.73-8.74 – these paragraphs which refer to the next Core Strategy review should be deleted.	Phase 2 Planning and Development Ltd	It is not possible to identify locations beyond the Ipswich Borough boundary as these areas of land are beyond the scope of this Plan and would need to be allocated by the respective planning authorities, potentially through joint working.	None.
Para. 8.73: concerned whether the pace of plan preparation will allow effective involvement – existing discussion forums have been poorly used to engage on strategic issues. BDC/MSDC is keen to collaborate with the Borough on dealing with strategic issues.	Babergh & Mid Suffolk District Councils	CS6 provides support for ongoing collaboration. The Duty to Co-operate Statement will outline in greater detail how the Borough Council has worked with adjoining districts in the preparation of the plan.	None.
<i>Policy CS7: The Amount of Housing Required</i>			
The policy attempts to provide a framework for housing delivery, but fails to do so, because it only refers to the allocation of land for 5,909 units, rather than 10,520 required according to Table 2. The reliance on windfall sites and future work with neighbouring authorities to deliver the missing 4,611 units (i.e. 44% of the supply), does not meet the requirements of the NPPF.	Phase 2 Planning and Development Ltd	Due to the constrained nature of the Borough there are limited opportunities to allocate land. The NPPF does not specifically require allocations to be identified to provide for the entire housing need. The NPPF only requires specific deliverable sites to be identified in relation to years 1-5, specific deliverable sites or broad locations in years 6-10 and only 'where possible' for years 11-15. Both the NPPF and accompanying guidance state that windfall sites can form part of future supply where there is	None.

		evidence that such sites have consistently become available in the local area.	
The amount of housing that is being proposed over the lifetime of the plan is unjustified. The evidence used does not provide a reliable assessment of need and the methodology deployed is not consistent with the evidence used by other authorities in the housing market area. The objective is need is likely to be much higher around 20,000 dwellings.	Home Builders Federation Ltd	Due to the constrained nature of the Borough there are limited opportunities to allocate land. The objectively assessed housing need has arisen from work undertaken jointly with adjoining districts on both the Strategic Housing Market Assessment and the more recent Ipswich Housing Market Area Population & Household Projections (2013). Housing need will be revisited as part of any future joint work with adjoining districts.	None.
The assessment of housing need based on trends for household creation and immigration over the past five years is questioned because these have been years of recession. It is suggested therefore that the forecast used underestimates of the true future need. It is suggested that there is no commitment to work with neighbouring authorities required by the duty to cooperate.	Private individual	A number of scenarios for future population and household growth are presented in the Ipswich Housing Market Area Population & Household Projections (2013). The issues expressed by the respondent may more closely relate to the 'household constrained' scenario which would be based upon recent levels of housing growth. However the selected scenario reflects patterns of trend population change, not housebuilding. Policy CS6 contains more detail regarding working with adjoining authorities.	None
Support joint working in the IPA but have concerns regarding CS7. The delivery of 1,600 dwellings on large brownfield windfall sites needs further justification.	Suffolk Coastal District Council	Further discussions have taken place with Suffolk Coastal District Council in relation to this issue under the Duty to Co-operate. Reasonable	None.

<p>The number of dwellings to be provided in neighbouring areas causes concern, because of environmental and infrastructure constraints, the lack of clarity about the proportion of dwellings to be provided in each neighbouring authority, broad locations and cumulative impact have not been sustainability appraised, and implications for the delivery of Core Strategies and Area Action Plans. Further sustainability appraisal work is needed on reasonable alternatives, and strategic allocations in adopted plans.</p>		<p>alternatives to developing outside of the Borough are limited, however the Sustainability Appraisal is to consider the effects of seeking higher densities on sites within Ipswich to alleviate the need to disperse development to other districts. It should be noted however that higher densities are not considered to be viable in the current economic climate. The Core Strategy cannot identify broad locations in other authority areas, the joint working referred to in the Core Strategy will provide the mechanism for considering these. The large windfall sites figure has been revised to 900 due to reflect the current anticipated delivery to 2031.</p>	
<p>New housing in Ipswich needs to be balanced with new jobs. A firm and realistic jobs growth target is needed over 2011-2031. Ipswich population, household and jobs growth forecasts need updating. Brownfield development targets need to be reinstated.</p>	<p>Private individual</p>	<p>Jobs forecasts have been provided through the East of England Forecasting Model, as referenced in the Draft Core Strategy and Policies DPD.</p>	<p>None.</p>
<p>A fully up to date assessment of housing needs is required, not based on an updated version of 2008 figures. Recent changes in the housing market, which underpin concerns about housing affordability and household formation, should be considered. There are unresolved concerns about household</p>	<p>Merchant Projects, Mersea Homes Limited</p>	<p>The 2012 SHMA was produced in accordance with Government Guidance contained in the NPPF. Policy CS7 explains how housing need will be met.</p>	<p>Further explanation to be provided through the revised Housing Topic Paper.</p>

headship rates and it is unclear how ONS data has been used. The Council also needs to demonstrate how it will meet need.			
The focus on housing delivery must not be at the expense of providing sufficient jobs. CS7 must be clear that meeting any provision outside the Borough in other districts requires agreement with those districts. The recognition that there is an identified shortfall in homes provision (4,611 homes to 2031) is helpful, although there is limited detail on how this shortfall is to be addressed and realistic options to be considered in this respect. The final sentence is unclear regards location of windfall sites.	Babergh & Mid Suffolk District Councils	The Core Strategy and Policies DPD sets out policies to support the creation of in the region of 12,500 jobs as well as seeking to meet housing need, although it is acknowledged that there may not be sufficient land within the Borough to meet the entire housing need.	The housing and jobs balance will be explained in the Topic Papers.
The Northern Fringe must continue to be allocated to contribute significantly towards meeting the Borough's housing needs throughout the plan period. Note the updated 2010 SHLAA and is satisfied the sites within the Borough are capable of delivering the housing requirement to 2023.	Crest Strategic Projects	Noted.	None.
Question population and household projections unless Ipswich is made a more attractive and compelling place to do business and shop.	Private individuals	The household projections have been identified using standard approaches as set out in Ipswich Housing Market Area Population and Household Projections: An Analysis of Demographic Change (2013). The Core Strategy and Site Allocations plans aim to improve the quality of the town through various policies and mechanisms.	None.

<p>Flaws in the forecasts for population and households. EEFM 2012 data used and not EEFM 2013. Latest ONS data not used which shows inward migration decreasing. DCLG household projections have not been appropriately considered despite being up to date (April 2013). Ipswich household data of 58,700 does not match April 2011 Census figure of 57,300. SA/SEA process requires examination of base information based on the best data available, which is not as they fail to use latest DCLG and EEFM forecasts. Travel to work data has not been used. EEFM also forecasts jobs growth to 2031, nine times faster than took place 1991-2011 which calls the forecasts into question.</p>	<p>Northern Fringe Protection Group, Save Our Country Spaces</p>	<p>The household projections have been identified using standard approaches as set out in Ipswich Housing Market Area Population and Household Projections: An Analysis of Demographic Change (2013). Whilst it is acknowledged that job projections were lower under the 2013 EEFM, this is negligible and is not considered to be significant enough to affect the level of jobs being planned for.</p>	<p>None.</p>
<p>The most sustainable option for accommodating the housing need for Ipswich and its wider housing market area will need to be agreed collectively, through increasing densities in Ipswich or allocating land elsewhere in the housing market area. The evidence base for the housing requirement will need to be informed by updates to national projections. In finalising housing requirements, the County Council will provide evidence on the ageing population and demand for specialised accommodation.</p>	<p>Suffolk County Council</p>	<p>The strategic alternative of increasing densities within Ipswich is considered to be an alternative which may be realistic in the longer term and will therefore be considered through the SA process. CS7 contains a commitment to work with neighbouring authorities later in the plan period.</p>	<p>None.</p>
<p>The Ipswich population and household forecasts are based on old data and need updating.</p>	<p>Private individuals (523)</p>	<p>The population and household projections are based on up-to-date data contained in the Ipswich</p>	

		Housing Market Area Population and Household Projections report (2013).	
Para. 8.79: includes the assertion that, because of a lack of housing land in the Borough, there will need to be negotiation with neighbouring authorities regarding future housing provision. The sentence appears to pre-suppose that there is no additional suitable land within the Ipswich boundary, which is not the case, and that decisions on locations should happen in the future. The relevant sentence requires deletion.	Phase 2 Planning and Development Ltd	The Strategic Housing Land Availability Assessment demonstrates that there is insufficient land within the Borough to meet the objectively assessed housing need, including land which may be suitable but is unlikely to be achievable during the plan period.	None.
Para. 8.79: the technical appendix to the Ipswich Housing Market Area Population and Household Projections report (September 2013) demonstrates that there are unresolved concerns about household headship rates. It is also unclear how the ONS data has been used as the Projections report refers to the use of an 'adapted version' of the CLG household model. Also the Housing Topic Paper makes no reference to the ONS household estimates used in the Projections report, which is of concern given that both result in a greater number of households than the trend based forecast adopted by the Council.	Mersea Homes Limited	Will clarify this further in a housing topic paper.	Further explanation to be provided through the revised Housing Topic Paper.
Para. 8.79: The Council should revisit the Ipswich Population and Household projections and revise corresponding targets giving proper consideration to the DCLG 2011 data and the latest data	Northern Fringe Protection Group	Will clarify this further in a housing topic paper.	Further explanation to be provided through the revised Housing Topic Paper.

including that from ONS, the East of England Forecasting Models and by incorporating the 2011 Census Commuting numbers expected in March 2014.			
Para. 8.80: The fifth row of Table 2 needs to refer to broad locations in the plural, rather than the singular, since it is evident that the single location at the Northern Fringe cannot meet the entirety of need up to 2031.	Phase 2 Planning and Development Ltd	The fifth row of Table 2 refers to a number of solutions including windfall sites and does therefore not imply that need will be met at the Garden Suburb alone.	None.
Para. 8.82: recognises that the National Planning Policy Framework requires, at the very least, the identification of broad locations for the growth required in years 11-15 of the plan, but then goes on to fail to identify where those locations may be.	Phase 2 Planning and Development Ltd	The NPPF states that broad locations should be identified for years 11-15 where possible. As such sites will need to be identified through working jointly with neighbouring authorities, it is not possible to identify them in a Plan which just relates to Ipswich Borough.	None.
Para. 8.83, 8.86 and table 3: the housing target of 13,550 homes is unachievable within the Borough and relies on windfall sites and neighbouring local authorities to make up the shortfall of 4,611 dwellings.	Northern Fringe Protection Group	Noted.	None.
Para. 8.84: notes that the housing requirement has increased from 7,500 dwellings to 13,171 dwellings and this should be given more prevalence with better explanation.	Babergh & Mid Suffolk District Councils	The revised figure relates to the timescale of 2013–2031 rather than the previous 2010–2022, which accounts for a large part of the difference, along with under-delivery during recent years. Explaining the difference between past and current figures is not considered to add any value to the justification for current figures.	None

<p>Para. 8.85: notes that the strategic housing land availability assessment (SHLAA) is satisfied that sites available up to 2023. Should clarify purpose of this statement that does not necessarily imply allocations beyond 2023 and will be informed by updates of the SHLAA as implied by paragraph 8.86.</p>	<p>Babergh & Mid Suffolk District Councils</p>	<p>Agree to amend text to state the SHLAA is periodically updated.</p>	<p>To amend text to state the SHLAA is periodically updated.</p>
<p>Para. 8.86: asserts that options for supply within the Borough boundary are limited, but there is no assessment of what land actually is available in the Borough boundary to meet housing need. Before reliance is placed on meeting needs in neighbouring areas, the Council should through this plan be seeking to allocate additional land on suitable SHLAA sites within the Borough boundary.</p> <p>Table 3 – the inclusion of 1,972 units to be delivered in the form of ‘residual need later in the plan period’ clearly does not accord with the requirement in the NPPF to identify either specific sites or broad locations for years 11-15 of the plan period.</p> <p>The calculation of windfalls needs to take into account that previous rates were delivered in the absence of an up to date plan, and prior to the identification of sites through the SHLAA process.</p> <p>Windfalls will also not be entirely on previously developed land as assumed by</p>	<p>Phase 2 Planning and Development Ltd</p>	<p>The SHLAA sites that are potentially achievable during the plan period have either been allocated or taken into account as possible windfalls.</p> <p>The NPPF states that broad locations should be identified for years 11-15 where possible. As such sites will need to be identified through working jointly with neighbouring authorities, it is not possible to identify them in a Plan which just relates to Ipswich Borough.</p> <p>It is agreed that large windfalls will not always necessarily on brownfield sites.</p>	<p>Revisit the large windfall figure and clarify through the Housing Topic Paper.</p> <p>Amend ‘Large unidentified brownfield sites’ in Table 3 to ‘large windfall sites’.</p>

the policy, e.g. garden land is now classified as greenfield.			
<i>Policy CS8: The Balance between Flats and Houses</i>			
Do not consider policy CS8 performs a meaningful function and therefore it should be deleted.	Mersea Homes Limited	CS8 enables houses to be delivered in accordance with the Housing Needs Study, in accordance with paragraph 50 of the NPPF which requires planning authorities to plan for a mix of housing based on needs of different groups.	None.
<i>Policy CS9: Previously Developed Land Target</i>			
Council should encourage effective use of land by reusing previously developed land. Development of brownfield needs priority over the Northern Fringe and allocating the whole Northern Fringe will have a negative impact on regenerating brownfield sites including the waterfront.	Private individuals, BNP Paribas Real Estate	The objectively assessed housing need for Ipswich cannot be met through the delivery of brownfield sites alone and it is therefore necessary for development to come forward at Ipswich Garden Suburb alongside the development of brownfield sites.	None.
Acknowledgement should be given to the potential for housing land in the town centre such as flats in the Great White Horse, former Co-op in Carr St, County Hall and the Civic Centre site.	Private individual.	Land at the Mint Quarter is identified as suitable for housing. Policy DM20 supports residential uses within the Central Shopping Area where there is an appropriate town centre ground floor use.	None.
Do not consider policy CS9 performs a meaningful function and therefore it should be deleted.	Mersea Homes Limited	Policy CS9 aims to direct development to brownfield land in accordance with the NPPF which aims to 'encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value'. It is	None.

		acknowledged however that development on greenfield land is also required.	
Recognise while Council will focus development on previously developed land, greenfield land will need to be developed to meet the objectively assessed housing need.	Crest Strategic Projects	Noted.	None.
Object to removal of PDL target. Allowing multi-site development across the entire Northern Fringe and removing the PDL target will result in new homes built on greenfield land at the Northern Fringe as it will be cheaper and easier for developers to do so compared with brownfield land. This will limit the regeneration of the town. Suggest a target/a small number of time dependent targets for PDL reinstated to ensure regeneration sites are prioritised over greenfield sites.	Northern Fringe Protection Group	The objectively assessed housing need for Ipswich cannot be met through the delivery of brownfield sites alone and it is therefore necessary for development to come forward at Ipswich Garden Suburb alongside the development of brownfield sites. Due to the level of infrastructure needed to bring forward the Garden Suburb development this will not necessarily be a 'cheaper' option for developers. Due to the need to bring forward the Garden Suburb in tandem with brownfield sites it is not appropriate to set a target for brownfield development.	None.
The amendments made to this policy are understandable.	Suffolk County Council	Noted.	None.
The target for brownfield site development has been removed. Feel this should be reinstated and priority given to regenerating these sites over developing the Northern Fringe greenfield site.	Private individuals (581)	The objectively assessed housing need for Ipswich cannot be met through the delivery of brownfield sites alone and it is therefore necessary for development to come forward at Ipswich Garden Suburb alongside the development of brownfield sites. Due to the level of	None.

		infrastructure needed to bring forward the Garden Suburb development this will not necessarily be a 'cheaper' option for developers. Due to the need to bring forward the Garden Suburb in tandem with brownfield sites it is not appropriate to set a target for brownfield development.	
Para. 8.102: recommend that a target or a number of small dependent targets are introduced for previously developed land to ensure regeneration sites, especially in areas of deprivation, are given priority over greenfield sites.	Northern Fringe Protection Group	The objectively assessed housing need for Ipswich cannot be met through the delivery of brownfield sites alone and it is therefore necessary for development to come forward at Ipswich Garden Suburb alongside the development of brownfield sites. Due to the level of infrastructure needed to bring forward the Garden Suburb development this will not necessarily be a 'cheaper' option for developers. Due to the need to bring forward the Garden Suburb in tandem with brownfield sites it is not appropriate to set a target for brownfield development.	None.
Para. 8.103: agree that the twin approach of urban regeneration plus greenfield urban extensions will ensure the Council can address its objectively assessed housing need. The Northern Fringe plays a critical role in this strategy.	Crest Strategic Projects	Noted.	None.

Policy CS10: Ipswich Northern Fringe			
Information on housing development phasing needs to be included in policy CS10 in line with statements in the SPD and the fact that the currently adopted Core Strategy states development will start in the southern section.	Westerfield Parish Council	The phasing of the development has been removed in recognition of the need to identify land to meet housing needs and also to enable strategic infrastructure to be provided in a coordinated manner. This is reflected in the approach to infrastructure planning set out in the Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014) which also contains guidance in relation to development sequencing.	None.
Policy and supporting text should make reference to the listed buildings that adjoin the urban extension area at Mill Farm and Sparrow's Nest Farm.	English Heritage	Listed Buildings have been identified in the Supplementary Planning Document and following English Heritage's comments on the consultation on the Ipswich Garden Suburb Supplementary Planning Document, reference to protecting the setting of Listed Building is included in the Supplementary Planning Document Interim Guidance (2014). It is considered that such detail is not necessary in the Core Strategy policy.	None.
Object to the policy requirement to provide 'a reserved site for a health centre' at the district centre of the Northern Fringe. In order to mitigate the healthcare impacts arising directly from the proposed development, the land required for the phased construction and fitting out of the new health centre floorspace would need	Lawson Planning Partnership on behalf of NHS Property Services Ltd on behalf of NHS England.	It is acknowledged that the health centre, rather than just a reserved site, should be provided. This has been addressed through the production of the Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014).	Amend policy CS10 to require provision of a health centre rather than just a reserved site.

<p>to be provided and fully funded by the developer and brought forward in accordance with a planning obligation and related phasing plan to be agreed with the NHS and the Borough Council.</p>			
<p>The houses at the Northern Fringe are not needed and would cause air pollution and traffic chaos. The development would cause flooding in Bramford and Claydon with drainage being a problem due to heavy clay soil. Important Grade 2 agricultural land would be lost. Development would place pressure on infrastructure, hospitals, social care, access to GP's, schools and lack of jobs. Sewers around the town cannot cope now. Replacing roundabouts with traffic lights should be resisted.</p>	<p>Private individuals</p>	<p>The Sustainability Appraisal has identified that there are likely to be effects on air quality however the proposals for sustainable transport identified in the Core Strategy and the Supplementary Planning Document Interim Guidance (2014) would act as mitigation measures. Provision for schools and a health centre and other infrastructure are set out in CS10, whilst the Supplementary Planning Document Interim Guidance (2014) sets out the details for delivery. Developers and Anglian Water are in discussion on what capacity improvements will be required.</p>	<p>None.</p>
<p>Without an additional access to the A14, the plans for sustainable travel will fail. The development will worsen motorist aggression towards cyclists/pedestrians. Assumptions about homeworking are unrealistic – economic sustainability should be considered and development synchronised with clear economic activity in Ipswich. A northern bypass should be included in the plan as Colchester / Valley / Norwich Roads are at capacity and are a contingency route when the Orwell Bridge closes. Also concern the development</p>	<p>Private individual</p>	<p>Additional access to the A14 would more likely encourage car use rather than sustainable travel to central Ipswich and other parts of Ipswich. Policy CS20 states that the Council will encourage key partners to investigate the possibility of a northern bypass. Whilst it is acknowledged that some greenfield development is necessary, policy CS9 supports development of brownfield land.</p>	<p>None.</p>

could set a precedent for further greenfield development around the periphery of Ipswich.			
The proposals affect the railway line/freight sites. Therefore the Council needs to consider the following points prior to coming to the Office of Rail Regulation with a proposal. 1. The aspiration to construct a road bridge over the railway – it is essential the Council have a discussion with Network Rail particularly in respect of gauge clearances. 2. The aspiration to increase the provision of passenger services to support new housing developments – as this would be a change in the operations to the network, the Council should speak to Network Rail, Greater Anglia and the Department for Transport.	Office of Rail Regulation	The Council is in discussion with the relevant organisations in relation to the issues raised.	None.
The projected 350 houses per year is over ambitious and assuming four developers on site it is considered more likely to be about 120 a year (30 each). There is also no knowledge of any viability testing with infrastructure and facilities making it potentially unviable. As a result this could mean the plan is unable to deliver the foreseen housing need due to over reliance on one large site.	Private individual	It is anticipated in the Supplementary Planning Document Interim Guidance (2014) that around 200 dwellings would be built per year from 2018. A viability assessment was undertaken as part of the production of the Supplementary Planning Document for the Garden Suburb which shows that the provision of the infrastructure identified is viable at this point in time.	None.
The Council should ensure a proper assessment is carried out with Anglian Water of sewerage and sewer network capacity requirements for the proposed	Environment Agency	Application requirements set out in the Supplementary Planning Document Interim Guidance 2014 include a Utility Infrastructure Report	None.

Ipswich Garden Suburb.		as part of the Environmental Impact Assessment. Developers and Anglian Water are in discussion on what capacity improvements will be required.	
Prioritise the development of brownfield sites over the Northern Fringe. The whole Northern Fringe should not be allocated now as this will have a negative impact on regenerating brownfield sites including the waterfront.	Private individual	The objectively assessed housing need for Ipswich cannot be met through the delivery of brownfield sites alone and it is therefore necessary for development to come forward at Ipswich Garden Suburb alongside the development of brownfield sites.	None.
Support the requirement for open space provision, the country park and the requirement for an SPD. Query why the requirement for 'prior adoption' of the SPD has been replaced by 'preparation' of an SPD which suggests development could now take place before the SPD is complete or adopted. It is essential that the country park and associated green infrastructure links are provided during the first phase of any development and are ready for use before dwellings are occupied, to avoid potential disturbance to ground nesting birds in the Sandlings SPA arising from recreational visits by Ipswich residents.	Suffolk Wildlife Trust	Reference is now made to 'preparation' of the Supplementary Planning Document as it cannot be formally adopted until the revised Core Strategy and Policies DPD is adopted. The Supplementary Planning Document Interim Guidance was adopted by the Council in September 2014. As the Country Park is physically associated with the Henley Gate neighbourhood its delivery needs to be associated with development at Henley Gate. However, following consultation on the Supplementary Planning Document, a requirement has been added to allow for planting and works as part of the early stages of development of Henley Gate. The provision for the country park is in accordance with the Appropriate Assessment of the Draft Core	None.

		Strategy and Policies DPD Focused Review (2014).	
The wording of the Core Strategy should be altered to reflect the Northern Fringe as the bedrock of the spatial strategy and its ability to deliver housing during the plan period.	Merchant Projects	It is agreed that reference to the Garden Suburb development should be given greater prominence.	Add reference to the Garden Suburb within Policy CS2.
Object to the Northern Fringe allocation on transport and drainage grounds. There is insufficient detailed information about the traffic management measures that would be put in place for Lower Road and Westerfield Road. What measures will exist to ensure Lower Road does not flood after the development has taken place?	Private individual	Application requirements set out in the Supplementary Planning Document Interim Guidance 2014 include a Utility Infrastructure Report as part of the Environmental Impact Assessment. Developers and Anglian Water are in discussion on what capacity improvements will be required. The Supplementary Planning Document Interim Guidance 2014 also contains specific infrastructure requirements relating to transport – the Core Strategy and Policies DPD does not need to include this level of detail.	None.
Object to whole development framework plan on grounds that present infrastructure is overwhelmed by extra traffic generated by the concentrated number of homes and associated services. Too much emphasis is placed on what is hoped will happen e.g. walking and cycling rather than using existing examples of overcrowded roads in the area.	Private individuals	The Supplementary Planning Document Interim Guidance 2014 also contains specific infrastructure requirements relating to transport – the Core Strategy and Policies DPD does not need to include this level of detail.	None.
Pleased coherent plan for this area including open spaces and preserving trees and hedges. Concerns include: maintenance of footways on Westerfield	Private individual	The Supplementary Planning Document Interim Guidance 2014 also contains specific infrastructure requirements relating to transport	None.

<p>Road, design of the buildings, provision of adequate access roads and parking (including for visitors); transport links, traffic bottlenecks elsewhere in the network, e.g. Bolton Lane, Ipswich School and Fonnerau Road/Crown Street junction.</p>		<p>and design – the Core Strategy and Policies DPD does not need to include this level of detail.</p>	
<p>CS10 defines issues which should be left to subsequent planning stages, e.g. amounts of land uses that will be delivered. This is inflexible and fails to provide for the planning application process whereby such amounts will be resolved through detailed master planning. Thresholds in Table 8B also cause concern ahead of testing through the application process. This approach has been accepted by the Borough in respect of highways and transport so should be extended to other infrastructure. It is premature to establish arbitrary targets and thresholds in the absence of any such applications.</p>	<p>Mersea Homes Limited</p>	<p>Other than for the Country Park, the area of which is a minimum due to it mitigating potential effects arising through the Habitats Regulations Assessment, the requirements are stated as approximates to allow a level of flexibility. Table 8B also provides for a level of flexibility should alternative levels of provision prove acceptable through the planning application process.</p>	<p>None.</p>
<p>Concerned about the lack of employment opportunities on a development of this scale, in order to minimise commuting. The proposal lacks: employment opportunities outside the main education/community hub; mention of B Class uses at the hub; and opportunities for commercial employment generating users at the local centres. Most new working age residents will have to travel given a lack of opportunities within close proximity, contrary to sustainable transport</p>	<p>Babergh and Mid Suffolk District Councils</p>	<p>The Ipswich Garden Suburb is located in a location which facilitates sustainable access to central Ipswich as well as other large employment areas such as Ipswich Hospital and employment uses in northwest Ipswich. The Core Strategy is providing sufficient land to deliver the jobs forecasted however even with the provision of the Garden Suburb sufficient land is not available for housing within the</p>	<p>None.</p>

<p>principles. The allocation represents a key opportunity to provide jobs close to homes and provide further employment land. Without it the proposal will exacerbate commuting / congestion in the IPA.</p>		<p>Borough.</p>	
<p>The Garden Suburb should come after the following: there are sufficient jobs in Ipswich for those moving into the area; existing brownfield sites are developed, e.g. Tooks; the present road system in north Ipswich has a major re-think; proper, adequate drainage is guaranteed for the suburb and surrounding neighbourhoods; local educational standards have improved, full employment is achieved, the town centre is thriving; all local authority housing is of good quality; and every unsightly brownfield site in Ipswich is put to good use.</p>	<p>Private individual</p>	<p>The provision of housing is a pre-requisite of economic growth as investment is less likely to occur without a suitable workforce. Modelling carried out by the County Council indicates that the development of the Garden Suburb will not warrant the provision of any additional major road infrastructure in north Ipswich, however the Core Strategy states that the Council will encourage key partners to investigate the possibility of a northern bypass. Developers and Anglian Water are in discussion on what capacity improvements will be required.</p> <p>The Supplementary Planning Document Interim Guidance 2014 also contains specific infrastructure requirements relating to transport – the Core Strategy and Policies DPD does not need to include this level of detail. Whilst the Core Strategy can require the provision of schools, it has little direct influence over the standards of education. In order to meet housing need, brownfield sites need to be delivered in tandem with</p>	<p>None.</p>

		the development at the Garden Suburb.	
Early clarification of the quantum of dwellings to be allocated through the SPD [and policy CS10] is essential ahead of any planning application so that there is clarity on matters such as site layout for drainage purposes and provision of infrastructure requirements such as waste water disposal and sewer network.	Environment Agency	Policy CS10 identifies that approximately 3,500 dwellings would be allocated. The Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014) contains requirements in relation to the provision of drainage and waste water infrastructure.	None.
Welcome changes to CS10 and deletion of previous phasing restrictions to post 2021 of a substantial part of the site. Support the principle of delivering the Northern Fringe as three neighbourhoods. This will help deliver a range of housing types and diversify the local housing market. However, the sequencing of housing and infrastructure delivery needs to be flexible to allow developers to respond to market activity and not restrict the comprehensive development of the site. Note the reduced capacity of 3,500 dwellings and agree there are no other areas the Council could identify for substantial growth.	Crest Strategic Projects	In relation to flexibility of infrastructure delivery, table 8B contains an element of flexibility in relation to the trigger points. The Supplementary Planning Document Interim Guidance (2014) contains guidance on sequencing, it is not necessary to include this level of detail in the Core Strategy.	Add text to CS10 to state that sequencing is set out in the Supplementary Planning Document.
This should be a high density development of 2 storey homes rising to three / four close to centres. Whilst the SPD encourages sustainable transport, we see little to discourage car ownership and use when travelling off site. Innovative thinking is needed: the railway companies should consider providing services from Westerfield to Ipswich station and east-	The Ipswich Society	The Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014) identifies that the general scale of housing will be two storey (para 3.24) although some higher or lower may be appropriate in some areas, but this will depend on the appearance and impacts on surrounding amenity. It is	None.

west bus services should be investigated. Cycle routes into Ipswich must be direct, convenient and prioritised over motor traffic. Correct provision of car parking on the site is a major challenge in terms of number and location. Traffic calming should be designed in throughout the development.		not necessary for this level of details to be provided in the Core Strategy.	
Multiple starts across the Northern Fringe could have unintended consequences, e.g. leading to pressure on Red House before constraints have been resolved.	Save Our Country Spaces	Allowing multiple starts will assist in the delivery of the required infrastructure.	None.
Policy CS10 does not refer to responsibilities for on-going maintenance, liability and on-going costs of key infrastructure, e.g. the country park, SUDs, swales, and sports facilities. The new policy direction for management arrangements over such a large and complex site must be contained within the Core Strategy so they can be examined. They could impact on viability and deliverability.	Save Our Country Spaces	The Supplementary Planning Document Interim Guidance (2014) has been subject to viability assessment which has concluded the infrastructure requirements are viable at this point in time. The Supplementary Planning Document Interim Guidance also contains measures related to long term management and maintenance.	None.
The allocation of the sports park at Tuddenham Road before it has gone through due process is prejudicial and predetermination. There are environmental, safety and access concerns and there are already numerous sports facilities in the vicinity.	Save Our Country Spaces	Allocation through the Core Strategy and Policies Development Plan Document represents 'due process'.	Conclusions relating to the Sustainability Appraisal of the sports park allocation will be provided in the Sustainability Appraisal report, including any mitigation measures deemed necessary.
The perceived requirement to ensure a five year housing land supply should not dictate multiple starts. It is implicit in the NPPF that factors should be balanced regarding sustainable growth in the	Save Our Country Spaces	The requirement to maintain a five year land supply is established via Government through the National Planning Policy Framework. Effects on the environment, population and	None.

economy, and adverse impacts on the local environment and population.		economy have been assessed through the Sustainability Appraisal process.	
The evidence base is contested, e.g. the modelling and projections of jobs and population. It is too imprecise. There is bias in timescales chosen and methodologies used resulting in too much uncertainty. Previous projections and estimates have not been realised.	Save Our Country Spaces	It is not possible to ascertain precisely the number of jobs and homes that will be needed however the forecasts have been produced using recognised methods.	None.
There is a deficit of employment sites in north and north east Ipswich. The triangle of existing employment areas links Ransomes, the former sugar beet factory, Northwest Ipswich and the town centre. The Core Strategy does not consider alternative employment land allocations at the Northern Fringe. The area will lose jobs related to agriculture without replacing with permanent numbers of alternatives.	Save Our Country Spaces	Whilst it is recognised that a small number of jobs in agriculture may be lost, the non-residential uses to be provided at the Garden Suburb will provide employment opportunities. Employment land is being allocated through the Site Allocations (Incorporating IP-One Area Action Plan) Development Plan Document to provide for the forecasted jobs.	None.
With home ownership at its lowest level since 1987 who will buy the homes?	Save Our Country Spaces	The Supplementary Planning Document Interim Guidance (2014) states that 'Each neighbourhood and each phase of development will be expected to deliver an appropriate mix of types and sizes of housing to provide variety and choice and meet a wide range of identified need.' In addition, affordable housing will be expected to be provided.	None.
There are data gaps in the SPD which may render the Core Strategy unsustainable, e.g. on hydrology,	Save Our Country Spaces	The Supplementary Planning Document Interim Guidance (2014) identifies infrastructure requirements	None.

topography, traffic trends, road adequacy, access and exits, congestion, rat runs, air pollution, drainage and flooding, country park allocation and delivery. Also the Peter Brett report on viability has been rejected by developers.		related to transport, utilities and the country park. Developers and Anglian Water are in discussion on what capacity improvements will be required.	
There are policy gaps in the Core Strategy review. The Council should consider reinstating the former transport policies from the 2001 draft Local Plan. The Suffolk County Council traffic reduction strategy needs to be reassessed and Ipswich Borough Council should address multiple impacts from new development on transport systems, air quality, road safety and congestion. Flood risk and management requires more awareness of the changing nature of drainage and new legislation and responsibilities.	Save Our Country Spaces	The effects of the Garden Suburb development have been considered through the Sustainability Appraisal of the Supplementary Planning Document, with mitigation measures identified accordingly. The Supplementary Planning Document Interim Guidance contains a requirement for strategic sustainable drainage systems (SuDS) infrastructure and connections. Developers and Anglian Water are in discussion on what capacity improvements will be required.	None.
Ipswich must avoid bland and dense development with drainage and subsidence issues like elsewhere.	Save Our Country Spaces	The Supplementary Planning Document provides guidance in relation to design based on garden suburb principles. Developers and Anglian Water are in discussion on what capacity improvements will be required.	None.
The detail of the Northern Fringe should be dealt with through the Core Strategy review and not through an SPD. Significant changes in the Core Strategy review, including multiple starts, will impact adversely on the SPD. The Core Strategy should set out the SPD	Save Our Country Spaces	The Supplementary Planning Document Interim Guidance (2014) contains guidance on sequencing, it is not necessary to include this level of detail in the Core Strategy. There are considered to be sufficient measures for controlling any	Add text to CS10 to state that sequencing is set out in the Supplementary Planning Document.

requirement for development sequencing, and control the number of sites to be operated by any one developer at any one time.		potential effects associated with multiple starts such as Construction Management Plans and Infrastructure Delivery Plans.	
Object to the change in wording to CS10 which changes the prerequisite for permission being granted from the adoption of the SPD to its preparation only. It does not strengthen the SPD.	Save Our Country Spaces	The Supplementary Planning Document cannot be formally adopted until the Core Strategy is adopted, however has been adopted by the Council as Interim Guidance prior to the adoption of the Core Strategy.	None.
Query the viability of the Red House site because of flood risk, high ground water, TPOs, biological features, archaeology and the need to adequately buffer noise from the railway. Any playing pitches would need to be located on flat, well drained land. Also the whole Northern Fringe site involves the loss of best and most versatile agricultural land. Query the adequacy of Westerfield Road to accommodate the traffic from housing, the secondary school, the district centre and so on. It is unsustainable and may be unsafe.	Save Our Country Spaces	The viability assessment produced as part of the production of the Supplementary Planning Document showed the development to be viable at that point in time. The loss of Grade 2 agricultural land has been identified as a negative effect through the Sustainability Appraisal of both the Supplementary Planning Document and the Core Strategy however there is insufficient brownfield land available to achieve the level of housing needed. Requirements for traffic assessments are identified in the Supplementary Planning Document Interim Guidance (2014).	None.
Locating new homes in Ipswich without new jobs for residents within the Borough or near to new sites of employment will breach policy CS5 (policy supported). Locating 3,500 new homes on the Northern Fringe will force people to commute to centres of new employment.	Northern Fringe Protection Group	The Supplementary Planning Document Interim Guidance (2014) contains requirements relating to a range of sustainable transport measures including bus services. The Core Strategy and Policies DPD and the Site Allocations	None.

<p>As there are no existing or proposed direct bus routes this will mean they will travel by car.</p>		<p>(Incorporating IP-One Area Action Plan) DPD seek to provide land for employment to assist in providing for the forecast jobs.</p>	
<p>Strongly object to multiple starts, which will work against policies CS2 and CS3 by undermining urban regeneration. Unintended consequences could include increased disturbance to residents over a longer period and piecemeal development which lacks coordinated bus routes. Mechanisms for controlling these risks e.g. development sequencing should be included in the Core Strategy review and developers should be limited to operating one site at any one time. Pitch provision should be reassessed and a specific area allocated. Bullet b. object to 'amplify' as its meaning is not clear. Bullet d. should specify the sequencing of housing and infrastructure delivery.</p>	<p>Northern Fringe Protection Group</p>	<p>There are considered to be sufficient measures in the Supplementary Planning Document Interim Guidance (2014) for controlling any potential effects associated with multiple starts such as Construction Management Plans and Infrastructure Delivery Plans. In order to meet housing need it is necessary to bring forward the Garden Suburb alongside the development of brownfield sites. The Supplementary Planning Document Interim Guidance (2014) contains guidance on sequencing, it is not necessary to include this level of detail in the Core Strategy.</p>	<p>Add text to CS10 to state that sequencing is set out in the Supplementary Planning Document.</p>
<p>Question the transport implications of allocating land at the Ipswich Garden Suburb for sports facilities.</p>	<p>Northern Fringe Protection Group</p>	<p>The transport implications of the land allocated for sports provision will be considered through the revised Sustainability Appraisal.</p>	<p>Conclusions relating to the Sustainability Appraisal of the sports park allocation will be provided in the Sustainability Appraisal report, including any mitigation measures deemed necessary.</p>
<p>The flexibility over land release provided by the revised policy is understandable. The specific references to primary road infrastructure, schools and library are welcome and provide a greater degree of weight and, therefore certainty. The</p>	<p>Suffolk County Council</p>	<p>Noted.</p>	<p>None.</p>

<p>triggers for delivery (table 8B) provide a clear framework, particularly for the strategic infrastructure. Whilst the detail is likely to be confirmed while the Core Strategy is progressed, the County Council has made it clear that a new secondary school will be needed by 2020. The timing of occupation of the 500 dwellings, the trigger for its delivery, will need to be kept under review.</p>			
<p>CS10 proposes multi-site development across the whole Northern Fringe from the outset. This needs to be controlled to avoid a free for all and having one large building site for the next 20 years. The whole of the Northern Fringe should not be allocated at this time since it will have a negative impact on regenerating brownfield sites including the waterfront. Jobs growth sites (e.g. Futura Park) are not easily reached from the Northern Fringe by public/sustainable transport. Since sufficient jobs growth is not forecast in the town centre commuting by car would seem inevitable, affecting congestion and air quality.</p>	<p>Private individuals (571)</p>	<p>Approximately 3,500 dwellings need to come forward to meet the identified housing need. It is anticipated in the Supplementary Planning Document Interim Guidance (2014) that around 200 would be built per year from 2018. It is accepted that there would be a certain level of effect no air quality however the Supplementary Planning Document Interim Guidance (2014) requires a range of sustainable transport measures. It should also not be assumed that those living at the Garden Suburb would only occupy 'new' jobs. The Garden Suburb is relatively accessible to employment opportunities at Ipswich Hospital and the Northwest Ipswich area as well as the town centre.</p>	<p>None.</p>
<p>A Northern bypass should be in place before the Northern Fringe is developed. The Valley Road and Colchester Road are not able to cope with such a suburb. The</p>	<p>Private individual</p>	<p>Suffolk County Council have identified that there is no need for a northern bypass to accommodate development at the Ipswich Garden</p>	<p>None.</p>

Orwell Bridge is closed too often.		Suburb. However, the Core Strategy states that the Council will encourage key partners to investigate the possibility of a northern bypass.	
Concern over how the Northern Fringe would be accessed from the A14. Whitton Church Lane is currently the route of choice. Increased use by cars and lorries will severely impact on quality of life.	Private individual	The Core Strategy states that the Council will encourage key partners to investigate the possibility of a northern bypass.	None.
Para. 8.107: it would be more sustainable to develop brownfield sites closer to proposed new employment areas before developing the Garden Suburb. NPPF section 17 encourages the use of brownfield land. Concerned the development of greenfield sites will prejudice development of brownfield sites which in Ipswich are in the more deprived areas which need regenerating.	Northern Fringe Protection Group	In order to meet housing need it is necessary to allocate the Garden Suburb along with brownfield sites. It is envisaged that around 150 to 200 dwellings will come forward each year within the Garden Suburb whilst a significant proportion of provision will come forward from the allocated brownfield sites.	None.
If multiple starts across the proposed Garden Suburb are to be sanctioned the Core Strategy should set out this intention and how this will be managed in the context of policy CS2.	Northern Fringe Protection Group	It is not the intention to sanction multiple starts. There are considered to be sufficient measures for controlling any potential effects associated with multiple starts such as Construction Management Plans and Infrastructure Delivery Plans.	None.
Para. 8.108: parts of the waterfront have been successful but in its entirety the regeneration of the waterfront cannot be described as successful as there are large derelict buildings and half-finished buildings that are a major eyesore and subject to anti-social behaviour (see comment on 5.12). Welcome Council's	Northern Fringe Protection Group	Redevelopment of the Waterfront is a long-term project and has been successful in regenerating this area. It is anticipated the derelict and half-finished buildings will be addressed in the short-term.	None.

initiative to set up a steering group to tidy up sites in preparation for investment options.			
Para. 8.109: bringing forward the Northern Fringe is critical to Ipswich's growth. It is important that the plan reads consistently. Currently this paragraph is outdated in suggesting the Northern Fringe could undermine the spatial strategy and it should therefore be deleted. Paragraphs 8.111 and 8.112 should also be deleted as they add nothing to the plan. Para. 8.113 sets out inconsistent time frames for delivery, given the need to commence development in the Northern Fringe at the earliest opportunity and should be deleted.	Mersea Homes Limited	The Ipswich Garden Suburb is important in meeting the objectively assessed housing needs of the Borough. However, this needs to be in accordance with policy CS10 and the Ipswich Garden Suburb SPD interim guidance (2014).	None.
Para. 8.109: acknowledge the Northern Fringe is the last remaining greenfield site within the Borough boundary that could support major housing development but it is not well connected to sites of expected employment growth. The Council should have proactively explored with its neighbouring local authorities alternative more sustainable options.	Northern Fringe Protection Group	Policy CS7 identifies that there is a need to work neighbouring authorities later in the plan period. The site is relatively well connected to Ipswich town centre and also to employment opportunities at Ipswich Hospital and Northwest Ipswich.	None.
Para. 8.111: amend and include it within the policy text itself. 'The Council will work with Babergh, Mid Suffolk and Suffolk Coastal District Councils to ensure optimum sustainable distribution of any development within the Ipswich Policy Area, bearing in mind the amenity and ecological value of the countryside outside the Borough boundary as well as within it, and the increased congestion effects of	Babergh & Mid Suffolk District Councils	Whilst it is not necessary to include this within the policy text of CS10 which specifically relates to delivery of the Garden Suburb, reference to working with adjoining authorities later in the plan period should be added into policy CS2. It is agreed that the potential effects on neighbouring authorities should be considered as part of the production	Amend policy CS2 to include reference to working with neighbouring authorities later in the plan period. The Sustainability Appraisal has considered the potential effects of working with neighbouring authorities as part of the Sustainability Appraisal.

any development outside the Borough boundary. Any such development must be supported by adequate infrastructure. Provision outside the Borough boundary will only be sought where evidence shows that locations within the boundary are unsuitable for such provision.'		of the Core Strategy and Policies DPD. Decisions over whether the priority should be to allocate in Ipswich first or via any other strategy would need to be taken as part of the process of working with neighbouring authorities.	
Para. 8.111: note and support this intention but would point out that if this had happened earlier more sustainable solutions may have been agreed in preference to developing the Northern Fringe, closer to employment growth sites and on lower grade agricultural land.	Northern Fringe Protection Group	Noted.	None.
Para. 8.115: NHS Property Services Ltd on behalf of NHS England objects to the deletion of 'new healthcare provision' from the list of infrastructure requirements to be provided as part of the Northern Fringe Garden Suburb, as detailed in paragraph 8.115. This deletion does not correspond with the text of policy CS10 and contradicts policy CS17 and table 8B of the Core Strategy review. The text 'new healthcare provision' should be re-instated to paragraph 8.115 to accurately reflect the infrastructure requirements arising from the proposed development of the Northern Fringe Garden Suburb.	Lawson Planning Partnership Ltd	Agreed.	To reinstate in the text.
<i>Policy CS11: Gypsy and Traveller Accommodation</i>			
Ensure that site allocations proposed accord with policy CS11.	Private individuals	Site IP261 has now been removed from the plan.	None.

Policy CS11 implies that Gypsy and Traveller sites may be identified outside the Borough without any justification for this approach. Permanent sites could be provided through major / comprehensive development schemes, e.g. Northern Fringe. Specific reference should also be made to the provision / funding of infrastructure to support Gypsy and Traveller development outside the Borough.	Babergh & Mid Suffolk District Councils	The site which was identified in Ipswich has been removed and due to the low supply of land within Ipswich it is considered appropriate to consider need for pitches across a wider area. Site IP261 has now been removed from the plan.	None.
<i>Policy CS12: Affordable Housing</i>			
Para. 8.127/policy CS12: affordable rented or intermediate housing can be easier to provide than social rented housing. Therefore a suggested change to the policy to read 'target figure of 80% of social rented accommodation will be sought' rather than 'at least 80% of affordable housing should consist of social rented housing'. Also the policy does not allow for off-site affordable housing or commuted payments in lieu of on-site provision. This approach would be helpful, particularly where viability assessments support it.	BNP Paribas Real Estate	It is agreed that this requirement is particularly inflexible, particularly bearing in mind the time period covered by the Plan.	Amend reference to the 80% target for social rented housing to be for affordable rented homes or homes for social rent.
Para. 8.128: considered that affordable housing targets (CS12) should have been reviewed along with other matters that it is felt do not conform with the NPPF and Regulation 122 of the CIL Regulations 2010.	Merchant Projects (Ipswich)	Affordable housing targets have been considered as part of the whole plan viability assessment and the levels suggested as viable have been incorporated within the policy.	Amend the policy in line with the whole plan viability report.
<i>Policy CS13: Planning for Jobs Growth</i>			
Para. 8.138: this should specifically mention the jobs target for Ipswich as well	Northern Fringe Protection Group	This is a general statement of the purpose of this policy. The jobs	None.

as the reference to Ipswich Policy Area as this is the main focus of the Core Strategy in relation to work.		target is contained in CS13.	
ALDI welcomes the recognition of retail jobs as part of economic growth but feel sites allocated for employment should be flexible to employment generating uses.	Planning Potential	Policy CS14 sets out the approach to retail development. Employment sites are allocated to deliver B class uses in appropriate locations. CS14 is consistent with the NPPF.	None.
No evidence to support the job growth forecasts given in CS13. Given there has been no growth in the last 5 years, a forecast growth of 17% over the plan period seems optimistic. Request the growth forecast for the different employment sectors is re-instated into the Core Strategy.	Westerfield Parish Council	The job growth forecasts have been produced using the East of England Forecasting Model. This will be detailed in an employment topic paper.	To detail the employment sectors in an Employment Topic Paper.
The specific site allocation at the former Crane's site is no longer required as there is a live planning permission on the site till 22 nd December 2015. Recommend policy CS13d, para. 8.150 and para. 8.152 are deleted. In the absence of any application non-B class uses can be assessed against policy DM25.	Barton Wilmore LLP	It is nevertheless necessary to allocate the land should the permission lapse.	None.
Para. 8.146 and policy DM25 seek to restrict uses on employment sites to those in the B class. It is suggested this is inflexible and there should be recognition of the role of all forms of economic development in employment creation. This can include retail and town centre uses, but also Sui Generis, in particular car showrooms. It is recommended that policy DM25 is amended to included reference to 'Economic Development' rather than B	Barton Willmore LLP	The provision of retail or town centre uses on out of centre employment sites would be contrary to NPPF policy on town centres and would undermine the strategy of the proposed IP-One Area Action Plan.	None.

Class uses; if not acceptable there should be reference to acceptable non B class uses and it is recommended car showroom is included.			
Re-iterate concern over abandonment of para. 3.3 and jobs-led strategy for a housing-led strategy and whether this fits the wider role of Ipswich regards providing employment for a wider area.	Babergh & Mid Suffolk District Councils	Employment land is being provided in reflection of the jobs forecasted through the East of England Forecasting Model.	An explanation of the relationship between land being allocated for employment land and the jobs forecast will be provided through the revised Employment Topic Paper.
The policy should recognise the role of supporting jobs in Ipswich Port by providing the conditions to enable expansion and re-use of land without the imposition of unnecessary restrictions or prohibitive standards.	Lafarge Tarmac	It is agreed that the role of the port could be given more prominence in this section.	Include reference to the role of the port in 8.141.
Absence of policy for growing jobs in Ipswich and regenerating the town centre. Residents of proposed new homes would have to look outside Ipswich for work which is not of any sustainable benefit to Ipswich.	Private individuals	The IP-One Area Action Plan contains policies relating to regenerating the town centre.	None.
The policy is based on current economic forecasts and will need to be updated to reflect the economic strategy for the borough and wider area. Priority should be afforded to employment generating development (principally offices and also leisure uses) in and around the town centre but particularly between the railway station and the town centre to reinforce this connection.	Suffolk County Council	The IP-One Area Action Plan contains policies relating to regenerating the town centre.	None.
A firm and realistic job target is required 2011-2031 and this needs to be in balance with the housing target.	Private individuals (513)	The jobs forecast is provided through the East of England Forecasting Model which is an	An explanation of the relationship between land being allocated for employment land

		acknowledged tool for this purpose. Whilst there are links between homes and jobs, there is no simple ratio between future projections for the two.	and the jobs forecast will be provided through the revised Employment Topic Paper.
Para. 8.141: the Core Strategy should retain as a goal a balance between homes growth and economic growth which the NPPF requires. In para. 8.141 'The town cannot support a growing population without commensurate change in level of accessible jobs provision' should therefore not be deleted.	Northern Fringe Protection Group	The jobs forecast is provided through the East of England Forecasting Model which is an acknowledged tool for this purpose. Whilst there are links between homes and jobs, there is no simple ratio between future projections for the two.	An explanation of the relationship between land being allocated for employment land and the jobs forecast will be provided through the revised Employment Topic Paper.
Para. 8.141: the only principal employment growth site within the Borough boundary is the A14 / Ravenswood / Ransome's expansion which are not well connected to the proposed Garden suburb which would therefore seem to make increased car based commuting inevitable.	Northern Fringe Protection Group	It should not be assumed that residents of the Garden Suburb would only be employed in 'new' jobs. Employment opportunities in the town centre, at the hospital and at Northwest Ipswich are relatively accessible from the Garden Suburb.	An explanation of the relationship between land being allocated for employment land and the jobs forecast will be provided through the revised Employment Topic Paper.
Para. 8.141: The 'wider Ipswich Area' needs to be defined to avoid confusion. It is essential that 'housing growth in Ipswich is matched by employment growth'. Strongly object to this proposed change and deletion of the words 'The town cannot support a growing population without commensurate change in the level of accessible jobs provision.' Support the decision to focus on the delivery of jobs within the Borough rather than the Ipswich Policy Area. However would like to see a firm jobs target for clarity. For instance, would a shortfall of 5, 10 or 20% be	Northern Fringe Protection Group	It is agreed this should be more specific. It should not be assumed that residents of the Garden Suburb would only be employed in 'new' jobs. Employment opportunities in the town centre, at the hospital and at Northwest Ipswich are relatively accessible from the Garden Suburb. It is not appropriate for the jobs target to be specific – the precise number of jobs that will be created is	Amend paragraph to refer to the Ipswich Policy Area. An explanation of the relationship between land being allocated for employment land and the jobs forecast will be provided through the revised Employment Topic Paper.

considered a success?		not directly linked to provision of land as this relates to the specific employer occupying the site.	
Para. 8.141: the Core Strategy has radically changed its focus from a jobs-led strategy to a housing needs-led strategy. Ipswich needs houses but it also needs jobs and the two need to be in balance. The implication of new homes being constructed without sufficient jobs being created will result in either higher unemployment levels in the Borough or new residents having to travel outside the Borough to sites of employment.	Private individuals (527)	The jobs forecast is provided through the East of England Forecasting Model which is an acknowledged tool for this purpose. The figure of in the region of 12,500 aligns the Core Strategy with the Suffolk Growth Strategy. Whilst there are links between homes and jobs, there is no simple ratio between future projections for the two. Employment land is being provided in reflection of the jobs forecasted through the East of England Forecasting Model.	An explanation of the relationship between land being allocated for employment land and the jobs forecast will be provided through the revised Employment Topic Paper.
Para. 8.143: welcome the Council aiming to align its jobs growth strategy to the Suffolk Growth Strategy. This paragraph should also mention alignment with the New Anglia Local Enterprise Partnership Strategic Economic Plan and European Investment Strategy and also the Government approved Greater Ipswich City Deal.	Northern Fringe Protection Group	It is agreed that reference to the New Anglia Local Enterprise Partnership should be included.	Add text to state that 'This is aligned with the New Anglia Local Enterprise Partnership Strategic Economic Plan and the Greater Ipswich City Deal.'
Para. 8.145: combined Core Strategy jobs growth is 38% higher than East of England Forecasting Model (EEFM) August 2013 data across Ipswich, Babergh, Mid Suffolk and Suffolk Coastal, suggesting each local authority's job targets may be unrealistic in relation to the aggregate potential. The disparity comes from the Babergh / Mid Suffolk forecast against that of the EEFM.	Northern Fringe Protection Group	Policy CS13 identifies measures in relation to the provision of in the region of 12,500 jobs as identified through the East of England Forecasting Model, and the Council is addressing employment needs in collaboration with the neighbouring authorities.	None.

<p>Babergh says the disparity is because of the need for jobs serving Ipswich which has insufficient space to provide them itself but this is not reflected in the Ipswich Core Strategy jobs growth figures and suggest double counting and doubts about 'close working' between authorities.</p>			
<p>Para: 8.145: table 5 should include the latest jobs growth estimates from 2011 to 2031. These differ from the 2012 EEFM data. In particular the 2013 EEFM forecast for new retail jobs is over twice the 2012 forecast. Such differences illustrate the degree of caution that needs to be placed on such long range forecasts. The EEFM employment estimates are derived from the 'Business Register and Employment Survey' which is survey data. Longer term historic growth trends for job creation need to be better considered when assessing future growth scenarios as these smooth out the effects of 'boom and bust'.</p>	<p>Northern Fringe Protection Group</p>	<p>The jobs forecast is provided through the East of England Forecasting Model which is an acknowledged tool for this purpose. The reason for planning for 'in the region of' 12,500 jobs reflects the uncertainties referred to in the response.</p>	<p>None.</p>
<p>Para 8.145: the Ipswich jobs growth forecasts are based on old data and need updating. The average jobs growth from 1991 to 2011 was 70 per year yet the Core Strategy assumes 625 a year from 2011 to 2031.</p>	<p>Private individuals (524)</p>	<p>The jobs forecast is provided through the East of England Forecasting Model which is an acknowledged tool for this purpose. The reason for planning for 'in the region of' 12,500 jobs reflects the uncertainties referred to in the response.</p>	<p>None.</p>
<p>Para 8.146: support the new bullet point to be inserted to 8.146 including creative and cultural industries for employment development.</p>	<p>The Theatres Trust</p>	<p>Noted.</p>	<p>None.</p>

<p>Para 8.146: although believe it is right to support the growth sectors identified in the Suffolk Growth Strategy and the New Anglia Local Enterprise Partnership 2014 Strategic Economic Plan, it is also important to focus on the top growth sectors identified for Ipswich, which are different. This needs to be made clear in the Core Strategy to ensure it is translated into both the Ipswich Economic Strategy and the Ipswich Economic Development Strategy Implementation Plan. The key sectors that appear not to be adequately reflected in the latter are: Business Services, Professional & Technical Services and Health & Care.</p>	<p>Northern Fringe Protection Group</p>	<p>The paragraph identifies those which are identified in the New Anglia Local Enterprise Partnership Plan for Growth and is therefore a factual statement. However, it is considered that of these those that are particularly well represented in Ipswich should be identified.</p>	<p>Add a further sentence which identifies those sectors which are particularly well represented in Ipswich.</p>
<p>Para 8.148: disappointed that the town centre has not been identified through the Suffolk Growth Strategy since there is a pressing need for regeneration and jobs growth in the town centre. In view of the local expertise in insurance, far more needs to be done to attract investment and new jobs into Ipswich town centre. Suggest this sector is given greater priority by the Council and note that it is given a mention in the Suffolk Growth Strategy. None of the growth sites identified are easily accessible from the Northern Fringe by public transport hence traffic congestion will arise.</p>	<p>Northern Fringe Protection Group</p>	<p>The Supplementary Planning Document Interim Guidance (2014) requires provision of public transport services as part of the Garden Suburb development. The IP-One Area Action Plan contains aims and policies relating to the regeneration of the town centre.</p>	<p>None.</p>
<p>Para. 8.153: support 'arts, culture and tourism' being inserted instead of 'cultural and leisure', for clarity within the tourism sector.</p>	<p>The Theatres Trust</p>	<p>Noted.</p>	<p>None.</p>

<i>Policy CS14: Retail Development</i>			
<p>Object to reduction of proposed retail floor space by 20,000 square metres and consider that such a move is counter-intuitive to the Core Strategy retail strategy which is based upon a diversified and improved retail offer for the town. While understanding the need for protection of the existing centre, a scheme is proposed which demonstrates that retail led regeneration of the waterfront at the Stoke Bridge end could deliver the Council's retail aspirations. Suggest extending the description and map-based definition of the central shopping area to include parts of the waterfront.</p>	<p>Agent on behalf of Applekirk Properties Ltd and Beeson Properties Ltd</p>	<p>The reduction is based upon the recommendations of the 2013 Appraisal of Ipswich Town Centre Opportunity Areas study by DTZ in order to protect the town centre and deliver the Westgate site.</p>	<p>None.</p>
<p>Title of policy CS14 should be amended to include reference to cultural facilities. These are a main town centre use and would support a change to the wording to refer to arts, culture and tourism. However, the retail offer and cultural / tourism offer are not connected and criteria for the maintenance of a successful shopping centre will not be the same as for tourist attractions and cultural offer. Theatres are part of the evening economy as well as being anchor for Ipswich's cultural offer and their success is not related to shops.</p>	<p>The Theatres Trust</p>	<p>It is agreed that the title should cover a wider range of town centre uses. The IP-One Area Action Plan contains policy relating to Arts, Culture and Tourism.</p>	<p>Amend title to 'Retail Development and Main Town Centre Uses'.</p>
<p>There is insufficient evidence to justify the proposed reduction in new retail floorspace in policy CS14 up to 2026; the figures are not based on an up-to-date assessment.</p>	<p>Nathaniel Lichfield and Partners</p>	<p>The reduction is based upon the recommendations of the 2013 Appraisal of Ipswich Town Centre Opportunity Areas study by DTZ in order to protect the town centre and</p>	<p>None.</p>

		deliver the Westgate site.	
Support commitment to improving the retail offer in Ipswich especially as the East of England Forecasting Model identifies the retail sector as the highest jobs growth sector in Ipswich in 2011-2031. Concerned that the Core Strategy position bucks the national trend regarding retail. Retail development at Westgate seems unlikely given the number of high profile withdrawals from Ipswich, the shift to online retailing and the failure to secure retail development of Cox Lane. A 47% increase in retail jobs in Ipswich is unachievable and should be reviewed. Consider the published views of Ipswich Central.	Northern Fringe Protection Group	The figure for delivery of retail floorspace is based upon the recommendations of the 2013 DTZ study in order to protect the town centre and deliver the Westgate site.	None.
Para. 8.156: Ipswich is not 'relatively isolated from competing (shopping) centres' as the Council states Ipswich has excellent transport links. There are a number of shopping destinations generally considered better than Ipswich that are easy to access such as Cambridge and Norwich as well as Westfield (Stratford), Lakeside and London. Smaller centres with more upmarket shopping are available at Bury St Edmunds, Woodbridge and Aldeburgh. As stated in para. 8.157 there is no room for complacency.	Northern Fringe Protection Group	It is agreed that other shopping destinations could be easily accessed from Ipswich when considering shopping trips which may be taken over greater distance.	Remove reference to Ipswich being relatively isolated from competing centres has been removed.

<i>Policy CS15: Education Provision</i>			
Schools are busy destinations and co-locating these with shops, health facilities can reduce the need for additional trips. Currently only nurseries and children's centres are referenced. The Council should consider how the emphasis on co-location of education might affect other policies, such as retail.	Suffolk County Council.	It is agreed that this principle should also apply to schools.	Amend the policy to include 'Where land is available, this would also apply to schools.'
Para. 8.172: this should also specifically state that 6 th form provision is required at the secondary school to be provided at the Northern Fringe.	Northern Fringe Protection Group	Table 8B includes reference to the need for a sixth form and it is therefore not necessary to repeat this here.	None.
<i>Policy CS16: Green Infrastructure, Sport and Recreation</i>			
Policy CS16 clause a. requires that new schemes contribute to meeting existing deficits in an area. This is contrary to Regulation 122 of the Community Infrastructure Levy Regulations 2012 and must be deleted.	Mersea Homes Limited	Regulation 122 requires planning obligations to be necessary, directly related to the development and fairly and reasonably related in scale and kind. It is therefore appropriate for the Council to use planning obligations to address local deficits where the overall quantity standard for the provision of open space, sport and recreation facilities (as set out in Appendix 6) would not be exceeded.	None.
Para. 8.180: Although the 'green rim' is a prominent feature of the Core Strategy Key Diagram, its sole reference in policy in the Core Strategy is in part (g) of policy CS16, which itself provides no justification or rationale for its existence. Policy DM33 of the Site Allocations plan refers to the	Phase 2 Planning and Development Ltd on behalf of Kesgrave Covenant Ltd	It is agreed that further explanation on the green rim is required.	Add to 8.170 and further details to Policy DM33, including reference to future development possibly helping to achieve its objectives.

green rim, but refers back to the Core Strategy for the provenance of that designation. Do not object to the green rim, but its rationale and purpose need to be made clear, and it needs to be recognised that the extent of it may vary as a result of the need to accommodate a further 2,000 homes not so far allocated. Since the stated objective is to achieve public access to the green rim, it may of course be that additional development on the fringe of Ipswich could contribute to that aim (as through the provision of a country park in the Northern Fringe).			
Para. 8.181: should quote NPPF paragraph 114 as follows: 'Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.'	Private individual	It is agreed the paragraph should more accurately reflect the NPPF wording.	Amend paragraph to include this wording.
Para. 8.181: the alterations to policy CS16 in relation to green infrastructure are supported.	Suffolk Wildlife Trust	Noted.	None.
<i>Policy CS17: Delivering Infrastructure</i>			
NHS Property Services Ltd on behalf of NHS England objects to the limitations imposed by the proposed changes to policy CS17 on securing direct provision of infrastructure by developers, as well as the payment of financial contributions towards mitigating the impacts arising from proposed developments. The policy as worded would preclude the direct	Lawson Planning Partnership	The policy is clear in stating that developments are expected to meet site related infrastructure needs and that commuted sums or CIL charges will apply to off-site infrastructure provision.	None.

<p>provision of infrastructure as mitigation would only be able to take the form of a 'Section 106 Agreement commuted sum or Community Infrastructure Levy (CIL) charge'.</p> <p>The policy text should be amended to: 'Each development will be expected to meet site related infrastructure needs and where the provision is needed to support a new development or mitigate its impacts, developments will be required to contribute proportionally through a Section 106 planning obligation or CIL charge.'</p>			
<p>In light of the revised requirement across the Borough over the period 2013-2031, NHS England has updated its evidence base in respect of the healthcare charge to be included in the Council's CIL Charging Schedule.</p>	<p>Lawson Planning Partnership</p>	<p>Evidence base noted. However a specific healthcare charge will not be set. Bids in relation to spending CIL funds are to be submitted at a later date and duly considered alongside other infrastructure projects where these are included on the Regulation 123 list.</p>	<p>None.</p>
<p>Support addition to policy CS17 of the term 'community and cultural facilities' and its being repeated in Appendix 5.</p>	<p>The Theatres Trust</p>	<p>Noted.</p>	<p>None.</p>
<p>The use of this policy to support delivery of green infrastructure is supported.</p>	<p>Suffolk Wildlife Trust</p>	<p>Noted.</p>	<p>None.</p>
<p>The relationship of CIL and Core Strategy policies will be adversely affected by unrealistic aspirational policies that affect the cost of development; governance guidance is that development should not be fettered by unreasonable financial burdens. In development terms it is premature to establish arbitrary target</p>	<p>Merchant Projects (Ipswich)</p>	<p>A whole plan viability report has been carried out. However further viability assessments will be required as part of the planning application process.</p>	<p>Revise requirements in the Core Strategy to reflect the conclusions of the whole plan viability report.</p>

thresholds in the absence of full viability assessments which can only be considered once an application is submitted for determination.			
Unclear whether archaeology comes under 'community and cultural facilities'. It may be appropriate to add reference to heritage facilities here also.	Suffolk County Council	Agreed.	Add reference to 'including heritage and archaeology'.
It is requested that any financial contributions towards the provision of social, environmental and physical infrastructure is sought in areas where there is an identified deficiency and at a level that ensures that overall delivery of appropriate development is not compromised. This request accords with Circular 05/05 which states that Section 106 contributions from development sites must be fair, reasonable and proportionate.	BNP Paribas Real Estate	A whole plan viability report has been carried out. However further viability assessments will be required as part of the planning application process.	Revise requirements in the Core Strategy to reflect the conclusions of the whole plan viability report.
Concern that the Council has not consulted upon key policies which affect viability and thus has a CIL relationship, which will undermine its approach and risk the adoption of the Core Strategy and CIL. Unrealistic and aspirational policy goals will undermine policy objectives through viability issues. Particular policies which raise viability concerns are: CS12 (unproven affordable housing target) and DM1, DM2, DM7, DM24, DM29 and DM30 (unproven requirements). Colchester recently reduced its affordable housing target to 20%.	Mersea Homes Limited	A whole plan viability report has been carried out. However further viability assessments will be required as part of the planning application process.	Revise requirements in the Core Strategy to reflect the conclusions of the whole plan viability report.
It is essential that supporting infrastructure	Babergh & Mid Suffolk	Traffic measures relating to the	None.

<p>is available to provide for the level of growth proposed. Concerned about the impacts of housing on transport infrastructure. Bringing forward the Northern Fringe proposal earlier in the plan period (before 2021) could mean that infrastructure is required earlier, or require different mitigation. The Borough need to make clear the consequential impacts on congestion and deal with the long-term problems caused by intermittent closure of the Orwell Bridge. Appropriate traffic modelling needs to be available to inform such decisions, based on the latest scale, distribution, and phasing of development.</p>	<p>District Councils</p>	<p>Garden Suburb are required through the Supplementary Planning Document Interim Guidance.</p>	
<p>The Council needs to be mindful in development policies for the future of Section 106 and CIL contributions that they do not overburden industrial uses as this could have unplanned for consequences on the delivery of jobs and the regeneration of employment land. The proposals for contributions from new employment developments (para. 8.196) need to be carefully considered and clarification should be provided on the forms of employment development to be appropriately included. Care must be taken to ensure that the future of existing industrial sites, e.g. Ipswich Port, Cliff Quay are not prejudiced.</p>	<p>Lafarge Tarmac</p>	<p>A whole plan viability report has been carried out. However further viability assessments will be required as part of the planning application process.</p>	<p>Revise requirements in the Core Strategy to reflect the conclusions of the whole plan viability report.</p>
<p>Libraries: the County Council will seek contributions from development to expand and improve the service provided by existing libraries in Ipswich. Developer</p>	<p>Suffolk County Council</p>	<p>Policy CS17 identifies community and cultural facilities as categories of infrastructure to be secured or financed by new development. The</p>	<p>None.</p>

<p>contributions will be spent by and in collaboration with Suffolk Libraries, on behalf of the County Council.</p> <p>Waste: the County Council would welcome the assistance of the Borough Council in implementing waste policy WDM17 (provision of recycling facilities at major sites).</p> <p>Fire: standard conditions in relation to access and water supply will be sought and hard standing for fire appliances may be required. Suffolk Fire and Rescue Service encourages a risk-based approach to provision of automated sprinkler systems.</p>		<p>need for libraries would be considered as part of the application process.</p> <p>DM5 requires new development to incorporate waste storage.</p> <p>Emergency services are listed within the categories of infrastructure to be secured or financed by new development, however the suggested details would be too detailed for inclusion within the Core Strategy and Policies DPD.</p>	
<p>Fresh water and sewerage infrastructure should be included in the 'key strategic infrastructure requirements' since both have previously been identified in the Haven Gateway Water Cycle Study as key issues for Ipswich and mentioned in the New Anglia Local Enterprise Partnership 2014 Strategic Economic Plan. The latter also identifies rail and road infrastructure improvements key to growth and prosperity which should be mentioned: A14/J57 Nacton £20m, A14/A12 J58 Ipswich Seven Hills Roundabout £10m and A14/A12 J55 Copdock major project £100m; better rolling stock and faster journey times on the Great Eastern main line; Felixstowe-Nuneaton electrification, Felixstowe branch line and the Ipswich</p>	<p>Northern Fringe Protection Group, Save Our Country Spaces</p>	<p>Utilities, which include water and sewerage infrastructure, and transport are listed within the categories of infrastructure to be secured or financed by new development.</p> <p>Policy CS20 identifies key transport projects including upgrading the Felixstowe to Nuneaton rail line.</p> <p>Policy CS10 sets out a requirement for a road bridge over the railway at the Garden Suburb.</p>	<p>None.</p>

Northern Fringe bridge.			
Para. 8.191: there is no reference specifically to water and sewage infrastructure as both have been identified as key issues for Ipswich in the New Anglia Local Enterprise Partnership 2014 Strategic Economic Plan. There are major unresolved issues specifically at the proposed Garden Suburb site regarding carrying foul water to a sewage treatment works.	Northern Fringe Protection Group	Utilities, which include water and sewerage infrastructure, is listed within the categories of infrastructure to be secured or financed by new development.	None.
Para. 8.193: there are inconsistencies in the car parking policy and ambiguity about Bury Road Park & Ride which the Site Allocations plan suggest will be reopened whilst at para. 8.194 reference to additional Park & Ride has been deleted. The proposed increase of car parking provision in the IP-One area is inconsistent with encouraging walking / cycling / public transport use and reopening of Bury Road. The need for additional IP-One parking is also questioned as it seems capacity is not reached currently.	Northern Fringe Protection Group	<p>The reference to additional Park & Ride was referring to Nacton Road.</p> <p>Developers and Anglian Water are in discussion on what capacity improvements will be required in relation to the Garden Suburb.</p> <p>Policy DM18 of the Core Strategy and Policies DPD and Policy SP17 of the Site Allocations (Incorporating IP-One Area Action Plan) DPD, aim to resist additional long stay park and to replace surface car parking, which does not represent an efficient use of land, with multi-storey. This is in conjunction with wider strategy to increase cycling and public transport as means of accessing the town centre.</p>	None.
<i>Policy CS18: Strategic Flood Defence</i>			
Para. 8.210: note the amended completion date of 2018. Consider it is essential that sites with less flood risk are allowed to	Crest Strategic Projects	The completion date for the tidal surge barrier is now stated as 2017. Policy DM4 would not support	None.

<p>come forward ahead of sites within zones 2/3. The Council is 'reasonably certain' that the funding for the final phase of the flood defences will be forthcoming. Consider that until there is greater certainty on this matter and the timing of delivery, sites dependent on the barrier for safe residential development should not be relied upon in the Council's spatial strategy. Thus the early development of the Northern Fringe becomes even more critical.</p>		<p>proposals where overall flood risk would be increased or where the development itself is not adequately protected from flooding.</p>	
<p><i>Policy CS19: Provision of Health Services</i></p>			
<p>No comments.</p>			
<p><i>Policy CS20: Key Transport Proposals</i></p>			
<p>Note para. 8.240 supports the aspiration for a northern bypass and that the merits and options are fully investigated. However, while the justifications regarding the Orwell Bridge are accepted, there is concern about the traffic impacts of the Northern Fringe on congestion given the development is being brought forward early. Concerned to understand the impacts on rural roads / villages that lie to the north of the development (such as Claydon / Coddham), would this require any element of the northern bypass and if so that policy CS20 be revised accordingly.</p>	<p>Babergh & Mid Suffolk District Councils</p>	<p>As identified in the Supplementary Planning Document Interim Guidance (2014) traffic management schemes will be informed by the Transport Assessment for the whole development. This recognises that schemes may be required in 'other locations'.</p>	<p>None.</p>
<p>Must ensure that regeneration proposals do not prejudice existing HGV movements into and from the Ipswich Port. Transport proposals must take appropriate account of existing haulage routes and where</p>	<p>Lafarge Tarmac</p>	<p>Policy DM17 provides for impacts of traffic movements to be considered, and this would include existing HGV movements where relevant.</p>	<p>None.</p>

possible help facilitate improvements which will also benefit the movement of traffic between this key employment area and the A14.			
Para. 8.240: note and support that 'The Council will work with neighbouring authorities and Suffolk County Council to ensure that the merits and delivery options for some form of northern bypass are fully investigated.'	Northern Fringe Protection Group	Noted.	None.
The identification of shuttle bus services would depend on viability. In the case of the waterfront, the short-term actions would, instead, be to enhance the pedestrian and cyclist experience along the waterfront and provide access to key locations for pick up / drop off and servicing.	Suffolk County Council	A shuttle bus service currently operates on Saturdays and occasional Sundays between the waterfront and the town centre. The policy supports this provision alongside enhancements to pedestrian and cycling provision.	None.
Para. 8.228: no mention is made of making more use of train services or investing in rail infrastructure to improve public transport further. More use of the Westerfield / Ipswich rail line should be made by adding more services and lightweight style people carrier trains for the route might help a more regular, punctual and relaxed service (e.g. British Rail Class 139). Suggests introducing a tram system into Ipswich.	Private individual	Tram systems have previously been considered but were judged to be too expensive. Policy CS20 identifies improvements to rail services. Opportunities for improvements to Westerfield Station are identified through the Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014) which may facilitate greater use of the rail line.	None.
Para. 8.228: further consideration of car parking solutions and the future of the Bury Road Park & Ride is required.	Northern Fringe Protection Group	Policy DM18 of the Core Strategy and Policies DPD and Policy SP17 of the Site Allocations (Incorporating IP-One Area Action Plan) DPD set out policies relating to car parking. The Bury Road Park and Ride site	None.

		remains available for use as a Park and Ride facility.	
Para. 8.240: the Council is committing to investigate a northern bypass yet the Ipswich Garden Suburb supplementary planning document assures the current road network will be able to cope with the increase in traffic generated. Argue the northern bypass would be an environmental disaster and the cost prohibitive. Suggest it is removed from the plan and the East Bank road option reinvestigated with tunnels and bridges to avoid Pipers Vale Country Park. No new junction would be required if it ran from junction 57.	Private individual	The supporting text to Policy CS20 refers to either a northern bypass or a link road. The East Bank link road was previously considered and is not supported by the Council.	None.
Chapter 9: Development Management Policies			
Para. 9.1: the policies should include a concise and flexible telecommunications policy outlining the criteria which should be met by proposals for the installation of telecommunications equipment in order to gain planning permission. These criteria would include the impact on visual amenity, proof of consideration of alternative sites and potential impact on ecology, landscape, archaeology and heritage. The policy should include an introduction indicating the Council's wish to facilitate expansion of the mobile telecommunications network whilst encouraging sharing of masts and equipment and installation on existing structures.	Mono Consultants Limited	It is considered that policies contained in the National Planning Policy Framework along with topic based policies contained within the Core Strategy and Policies DPD are sufficient in relation to the consideration of proposals for telecommunications.	None.

Para. 9.2: updates made to ensure the review is consistent with the National Planning Policy Framework are welcomed and the outcomes the policies seek to achieve are supported in principle.	Crest Strategic Projects	Noted.	None.
<i>Policy DM1: Sustainable Development</i>			
Policy DM1 is inconsistent with the provisions of central government sustainability policy despite the insertion of the wording in para. 9.4. Amend DM1.	Mersea Homes Limited	It is agreed that, whilst the aspirations of DM1 remain supported, the policy should be revised to bring it into line with viability considerations and the Government's current approach to application of the Code for Sustainable Homes.	Amend policy DM1 to require Level 4 of the Code for Sustainable Homes.
<i>Policy DM2: Decentralised Renewable or Low Carbon Energy</i>			
Policy DM2 cannot require decentralised energy sources. This is out of step with national planning policy, as has been made clear in para. 009 of the National Planning Practice Guidance. Amend DM2.	Mersea Homes Limited	Policy DM2 is consistent with paragraph 96 of the NPPF and the provisions of the Planning and Energy Act 2008.	None.
<i>Policy DM3: Provision of Private Outdoor Amenity Space in New and Existing Developments</i>			
Para. 9.21: feel that where car parking is provided in the rear garden this space should be in addition to the minimum referred to.	Northern Fringe Protection Group	It is agreed that clarification is needed to ensure that parking space in gardens is not counted as garden space.	Add a sentence to the supporting text to state that garden sizes need to be calculated independently of any parking space(s) to be provided.
<i>Policy DM4: Development and Flood Risk</i>			
Bullet a. SuDS may not just affect the immediate area but through draining into watercourses and rivers contribute to the flood risks elsewhere. Suggest a minor	Northern Fringe Protection Group	The change to the text is not necessary as the policy and supporting text infers that off-site flood risk would be considered,	Add 'Or elsewhere' to the policy as suggested.

amendment to read 'it does not increase the overall risk of all forms of flooding in the area or elsewhere'.		however the amendment would add clarity.	
Para. 9.30: measures to ensure that new development is flood resilient are supported. Must be recognised that the re-use and expansion of existing industrial sites located within the flood plain (including the Ipswich port) should not be unnecessarily fettered by flood restrictions where simple measures such as flood evacuation plans can allow industrial activity to safely take place.	Lafarge Tarmac	Noted. This is addressed further in the Development and Flood Risk Supplementary Planning Document (updated 2014) and it should be noted that the National Planning Policy Guidance identifies many port related activities as water compatible.	None.
<i>Policy DM5: Urban Design Quality</i>			
Policy DM5 appears to indicate a need to meet Building for Life criteria. If this is the case, flexibility inserted through para. 9.52 should be reflected in the bullet.	Mersea Homes Limited	It is recognised in paragraph 9.52 that it may not be possible to meet all of the criteria and therefore developers will be expected to justify why this is not possible.	None.
The built environment plays a role in supporting good mental health through access to services and the creation of environments which feel safe and encourage social interaction. The Borough's approach to space and design will be important in addition to applying the principles of 'Secured by Design'. To create an environment which enables older people to have a good quality of life, the Borough should support the implementation of the Government's 'Lifetime Neighbourhoods' principle in new development. This covers the built environment, access to services, resident empowerment and housing standards.	Suffolk County Council	It is agreed that the principles of Lifetime Neighbourhoods should be recognised, in the context of the requirements of DM5.	Amend the supporting text to state that the criteria in DM5 are applicable to the delivery of Lifetime Neighbourhoods.

Para. 9.43: welcome part (e) of policy DM5 relating to the special character and distinctiveness of Ipswich. The completion of the Urban Characterisation Study would help to support this policy.	English Heritage	Noted. The Council has recently consulted on the draft Urban Character Supplementary Planning Document.	None.
Para. 9.49: policy DM5 should specify that new buildings provide for wildlife friendly measures such as bat boxes and swift bricks at an early stage of planning.	RSPB	It is agreed that reference to such measures should be mentioned, although this is more relevant to DM31 The Natural Environment.	Re-word DM31 to state that all development is required to incorporate enhancement measures for biodiversity and reference has been included in the supporting text on how to obtain advice on improving the attractiveness of gardens for wildlife.
<i>Policy DM6: Tall Buildings</i>			
Para. 9.63: generally welcome the criteria within policy DM6 regarding tall building proposals and maintain a comprehensive and thoroughly modelled policy is required, as well as a general policy approach on the identification of strategic views. Part (j) of the policy helpfully refers to conservation areas, but it would be strengthened by reference to listed buildings and other heritage assets.	English Heritage	Feel the policy is worded appropriately.	None.
<i>Policy DM7: Public Art</i>			
No comments made.			
<i>Policy DM8: Conservation Areas</i>			
Para. 9.68: welcome a specific policy on conservation areas (and buildings of townscape interest) but there is a need for development management policies that address other designated heritage asset types. The current wording of policy DM8 is rather brief and only acts as a policy	English Heritage	It is agreed that the policy needs to be more comprehensive and further discussions have taken place with English Heritage in this respect.	Amend DM8 to address this comment.

<p>hook for the Council's conservation area appraisals and management plans.</p> <p>Wish to see a more inclusive policy approach setting out how planning applications should address a range of heritage assets and issues at the development management stage. Believe policy DM8 could go further in terms of offering guidance for development affecting conservation areas (e.g. setting out design issues etc.)</p>			
<p><i>Policy DM9: Buildings of Townscape Interest</i></p>			
<p>Para. 9.73: welcome policy DM9, although suggest its wording may need reconsidering in light of the National Planning Policy Framework and English Heritage's recommendation of greater policy coverage for designated heritage assets. The current wording will need to be consistent with both national policy and other parts of the Core Strategy.</p>	<p>English Heritage</p>	<p>Following revisions to DM8 (see above) it is not considered necessary to also amend DM9.</p>	<p>None.</p>
<p>Para. 9.74: the policies map shows an area of archaeological importance, which is also referenced in para. 8.42. However, there is nothing in the Core Strategy that explains what this means in terms of any relevant planning application, making this designation ineffectual.</p> <p>There should be reference in a policy and/or supporting text regarding the area of archaeological importance and what it means for proposed developments.</p>	<p>English Heritage</p>	<p>It is agreed that further reference to the significance of the Area of Archaeological Importance is needed.</p>	<p>Amend policy DM8 to include reference to the significance of the Area of Archaeological Importance and also show the area on the separate plan (Plan 4).</p>

<p>Para. 9.74: add text to para. 9.74 / policy DM9 as follows:</p> <p>‘Attention is drawn to Appendix X which shows the Area of Archaeological Importance of the Anglo-Saxon and Medieval town, aspects of which are internationally recognised. Beyond this area, the Borough includes part of the wider landscape of the Gipping Valley and Orwell Estuary, and there are Prehistoric, Roman, Anglo-Saxon and other period archaeological sites within its boundaries.’</p>	Suffolk County Council	It is agreed that further reference to the Area of Archaeological Importance should be included.	Include the suggested text alongside policy DM8.
<i>Policy DM10: Protection of Trees and Hedgerows</i>			
No comments made.			
<i>Policy DM11: Central Ipswich Skyline</i>			
<p>Para. 9.82: generally support policy DM11 and the intention to protect the setting of Central Ipswich. This policy needs to be compatible with the tall buildings policy and site specific proposals within the overall local plan.</p>	English Heritage	DM11 has been deleted as it is considered covered by DM6.	None.
<i>Policy DM12: Extensions to Dwellinghouses and the Provision of Ancillary Buildings</i>			
No comments made.			
<i>Policy DM13: Small Scale Infill and Backland Residential Developments</i>			
<p>Para. 9.89: refer policy DM13 to IP261, a proposed site allocation for a small scale infill residential development site for gypsies and travellers. DM13 states that such development will not be permitted unless: it is sited where it will not be</p>	Private individual	These concerns are noted.	Remove allocation IP261.

disturbed by other land uses (the adjacent A14 will disturb it); it establishes a safe and secure environment (the adjacent A14 will disturb it); it protects the setting of existing buildings (a gypsy and traveller site is inappropriate next to a large house standing in extensive landscaped grounds); it protects the amenity of the neighbourhood (it cannot); it has safe and secure access (it does not).			
<i>Policy DM14: The Subdivision of Family Dwellings</i>			
No comments made.			
<i>Policy DM15: Travel Demand Management</i>			
No comments made.			
<i>Policy DM16: Sustainable Transport Modes</i>			
Para. 9.94: enforceable speed limit needed on the bridleway.	Private individual	This is beyond the scope of the Core Strategy and Policies DPD.	None.
Para. 9.99: should clearly state that air quality is worsening in Ipswich and that further Air Quality Management Areas (AQMA) are currently being defined. Pedestrians and cyclists will not want to walk/cycle through AQMA alongside queuing traffic as this will damage their health undermining sustainable travel options. Ipswich's air quality needs to be assessed in the context of Directive 2008/50/EC 21 May 2008 on ambient air quality and cleaner air for Europe. The Core Strategy and sustainability appraisal must take account of the annual Progress reports in relation to compliance with this	Northern Fringe Protection Group	Further assessment of the Garden Suburb allocation in terms of air quality is being undertaken through the Sustainability Appraisal process. The provisions of DM16 have been incorporated into DM17 and it is considered that further details on the current situation surrounding AQMA could be included within the plan.	Add further detail on the current situation around AQMA into CS20 Key Transport Proposals.

Directive.			
<i>Policy DM17: Transport and Access in New Developments</i>			
No comments made.			
<i>Policy DM18: Car Parking</i>			
<p>Para. 9.108: There is no reference to a policy for short-stay parking which is considered essential.</p> <p>Therefore develop a policy for short-stay parking which reflects the real-time economy and is integral to a parking strategy for the town (both long and short stay) which identifies, and assesses and justifies that which is deliverable in the plan period to meet the level of need.</p>	Agent representing RCP Parking Ltd	Sites for short stay car parking have been allocated through the Site Allocations (Incorporating IP-One Area Action Plan) DPD which also includes a policy for short stay car parking in the town centre.	None.
<i>Policy DM19: Cycle Parking</i>			
No comments made.			
<i>Policy DM20: The Central Shopping Area</i>			
<p>Para. 9.114: there is too much retail space in the town centre and it should be reduced in favour of residential use. The vacant units create an impression of decline and managed replacement of retail space with houses (not flats) should occur in Carr Street and Upper Orwell Street. The only retail model that might work in the town is a 'designer outlet village' if a large enough space is found. A shuttle bus from the railway station to the town centre should also be introduced for visitors.</p>	Private individual	<p>The 2013 Appraisal of Ipswich Town Centre Opportunity Areas study by DTZ identified that there is scope for additional retail use. A housing allocation is identified at the Mint Quarter and Policy DM20 would support residential use within the Central Shopping Area provided there is a ground floor retail use.</p> <p>There are existing bus services between the railway station and the town centre.</p>	None.
<i>Policy DM21: District and Local Centres</i>			
Designation of the Nacton Road retail park is supported subject to an extension to its	Barton Willmore LLP	Whilst planning permission exists for retail uses it is not appropriate to	None.

<p>extent to include Futura Park because it is within 800m of Nacton Road and well served with cycle and pedestrian links. The success of the Nacton Road site supports its expansion but there is no immediately available site to the south or west.</p>		<p>allocate a retail element at Futura Park and it should be noted that the retail uses act as enabling development to employment uses at this site in this respect.</p>	
<p>Bringing forward the Northern Fringe is critical to Ipswich's growth. It is important the plan reads consistently. Policy DM21 should provide for two new district centres to be provided, as the centre at the Northern Fringe should also be identified.</p> <p>Amend DM21 to refer to two new district centres.</p>	Mersea Homes Limited	<p>Policy DM1 refers to the development of a new District Centre at Ipswich Garden Suburb.</p>	None.
<p><i>Policy DM22: Town Centre Uses Outside the Central Shopping Area</i></p>			
<p>No comments made.</p>			
<p><i>Policy DM23: Retail Proposals Outside Defined Centres</i></p>			
<p>The 200 square metre threshold is too restrictive, especially in respect of the potential requirement for an impact assessment. The NPPF sets a default threshold of 2,500 square metres, which is considered to better reflect retail proposals that would potentially require investigation of impact.</p> <p>Amend policy to read: 'Retail proposals in locations outside defined centres will only be permitted if the proposals can be demonstrated to be acceptable under the terms of the National Planning Policy</p>	Planning Potential	<p>The 200 square metres threshold is considered locally specific.</p>	None.

Framework'			
<p>In favour of improving retailing in the town centre with brownfield sites used for residential. Concerned at lack of plans for attracting new employment to the wider Ipswich area and reliance on service growth. Supportive of idea that varied and quality housing will attract people from London and its suburbs. Small speciality shops should be encouraged. Concerned that quality of design is not improving as much as hoped, policy DM5 needs to be strong so poor design is refused. Central skyline policy and policy on out of town retail (DM23) are supported.</p>	Ipswich Society	<p>The Site Allocations (Incorporating IP-One Area Action Plan) DPD identifies opportunity areas relating to improving retail in the town centre and also allocates a number of brownfield sites across the Borough for housing development.</p> <p>Policy CS13 focuses on the sectors for growth identified in the New Anglia Local Enterprise Partnership Plan for Growth. The Greater Ipswich City Deal focuses on ensuring the skills exist in relation to future growth.</p> <p>DM5 states that design not meeting the criteria will be refused.</p> <p>Support for DM23 and DM11 is noted. Note that DM11 now incorporated into DM6.</p>	<p>Include reference to the Greater Ipswich City Deal within the supporting text to CS13.</p>
<i>Policy DM24: Affordable Housing</i>			
<p>Para. 9.137: support the amendments to the supporting text to DM24 so it now states the final percentage of contribution can be agreed through negotiation and can be informed by viability matters. This is a beneficial policy approach to take when large strategic sites are being planned in the Borough. It is important to have this check for major developments where viability considerations can be</p>	Crest Strategic Projects	<p>This text has been removed from DM24 as CS12 sets out the circumstances where the affordable housing requirement may be relaxed.</p>	None.

complex.			
<i>Policy DM25: Protection of Employment Land</i>			
Para. 8.146 and policy DM25 seek to restrict uses on employment sites to those in the B class. Suggested this is inflexible and there should be recognition of the role of all forms of economic development in employment creation. Wider uses can include retail and town centre uses, but also Sui Generis, in particular car showrooms. Recommended that policy DM25 is amended to include reference to 'Economic Development' rather than B Class uses; if not acceptable there should be reference to acceptable non B class uses and it is recommended car showroom is included.	Barton Willmore LLP	The provision of retail or town centre uses on out of centre employment sites would be contrary to NPPF policy on town centres and would undermine the strategy of the proposed IP-One Area Action Plan.	None.
The policy is unclear; the word 'or' should be inserted after (b), or (a) and (b) should be combined. The new text at 9.140 also potentially conflicts with criteria at (a) and (b) and should be deleted. The approach to employment sites should be considered in relation to the need for other uses. The evidence base shows more retail and leisure is required and it is requested the Jewson site is allocated to help meet the need. Policy DM25 as written risks prejudicing the supply of retail/town centre floorspace in suitable locations.	Nathaniel Lichfield and Partners	It is important for alternative uses to meet these two requirements, they are not mutually exclusive criteria. The text at 9.140 ensures that the approach to retail is consistent with other policies, particularly DM23. In terms of retail, the 2013 Appraisal of Ipswich Town Centre Opportunity Areas study by DTZ identified that an additional 15,000sqm of retail could be accommodated and this is to be focused primarily at the Westgate site.	None.
Policy DM25 appears not to recognise the flexibilities demanded by para. 22 of the National Planning Policy Framework.	Mersea Homes Limited	Paragraph 22 of the NPPF refers to employment allocations rather than sites currently in employment use. However, it should be noted that it is	None.

		considered appropriate to also require proposals to demonstrate that there is no reasonable prospect of the site being used for employment purposes over the plan period, and a further criterion has been added in this respect.	
The policy should explicitly acknowledge the important role of Ipswich Port and the need for flexibility to support both port related activities and established industrial uses within the port site.	Lafarge Tarmac	Agreed.	Add a paragraph to the supporting text to highlight the role of the port.
Para. 9.139: policy DM25 is too restrictive in the context of the Cliff Quay site (IP067) and the Council should allow the release of the land for non-employment uses if there is lack of market demand or unsuitability of the land. Suggested that tests of suitability of market demand (through a 12 month marketing exercise) be included in the policy as exception tests to allow surplus employment sites to come forward; this would accord with paras. 51 and 22 of the National Planning Policy Framework.	BNP Paribas Real Estate	Sites identified for employment uses are to ensure the delivery of the jobs target in policy CS13.	None.
<i>Policy DM26: Protection of Amenity</i>			
The sub-text to policy DM26 at para. 9.146 is of particular importance in assessing the Council's proposals for regeneration. In planning for more sensitive uses (e.g. housing), these should be located away from industrial sites to prevent future objections which may prevent the effective operation of the existing use and thus be harmful to the economy.	Lafarge Tarmac	Noted.	None.

<i>Policy DM27: Non-residential uses in residential areas</i>			
No comments made.			
<i>Policy DM28: Protection of Open Spaces, Sport and Recreation Facilities</i>			
No comments made.			
<i>Policy DM29: Provision of New Open Spaces, Sport and Recreation Facilities</i>			
Policy should be amended to refer to Ipswich's 2014 sports facility study. Large housing developments will require indoor sports facilities and new development should therefore include provision for this or contributions to off-site facilities and the policy should be amended to reflect this.	Sport England	Agreed. The policy requires provision of sports facilities which would include indoor provision where there is a need.	Add a sentence to the supporting text to refer to the Playing Pitch Strategy and the Indoor Sports Facilities Study.
The change to policy DM29 to clarify the function of incidental open space is welcomed. However, supporting Appendix 6 appears to have been changed on the basis of evidence not in the public domain. This evidence must be published.	Mersea Homes Limited	The evidence will be published alongside the proposed submission public consultation.	Publish evidence alongside the proposed submission public consultation.
<i>Policy DM30: The Density of Residential Development</i>			
Policy DM30 has been updated, although the space standards set out in para. 9.163 have not been reviewed.	Mersea Homes Limited	Noted.	None.
Para. 9.160: not clear whether the density targets set out in the policy has been reviewed since the adoption of the Core Strategy to establish whether they remain appropriate. High densities may be acceptable in some locations, including the town centre, but care needs to be taken to avoid harm to heritage assets through overly dense development. The	English Heritage	It is agreed that an element of flexibility may be needed to protect heritage assets. It is also agreed that any specific design issues should be highlighted in relation to the site allocations where relevant.	Add a reference to the need to allowing an element of flexibility to protect heritage assets into the final paragraph of the supporting text. Add key heritage / design considerations to the site sheets where relevant.

policy helpfully sets out exceptions to the general approach, and recommend specific site allocations provide clarity with regards to overall design issues.			
Para. 9.161: fourth bullet – recommend that the land set aside for SuDS is not included in the calculation of housing density for a development.	Northern Fringe Protection Group	This is not considered necessary as the fourth bullet point identifies that lower overall densities may be acceptable where SuDS are required.	None.
<i>Policy DM31: Conserving Local Natural and Geological Interest</i>			
No comments made.			
<i>Policy DM32: Protection and Provision of Community Facilities</i>			
<p>Policy DM32 and supporting text provide no description of what is meant by the term ‘community facilities’. The National Planning Policy Framework para. 70 states that to deliver needed community facilities including cultural facilities, policies should guard against the unnecessary loss of valued facilities. DM32 should include cultural facilities, e.g. museums, libraries and galleries.</p> <p>Add reference in para. 9.169 to cultural facilities and provide a proper definition of ‘community facilities’ in the glossary: ‘Community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.’</p>	The Theatres Trust	The supporting text contains a list of facilities included within the definition. Museums and galleries are within the definition of ‘main town centre uses’ in the NPPF and would be considered under policy CS14 Retail and Main Town Centre Uses.	None.
Chapter 10: Implementation			
Para. 10.4: refer to earlier comments in relation to the Ipswich Policy Area Board	Northern Fringe Protection Group	Paragraph 10.4 and Policy CS6 identify the arrangements for joint	None.

and the need for better working with neighbouring local authorities in relation to the creation of new jobs and the location of new homes near to the sites of those new jobs.		working with neighbouring authorities.	
Para. 10.9: surprised at absence of proposals here as set out within the site-specific allocations development plan document, but clearly part of the transport strategy delivery, for the implementation and delivery of the multi-storey car parks proposed.	Individual planning agent	Multi-storey car parks are not major infrastructure projects.	None.
Para. 10.9: table 8A does not refer to rail infrastructure enhancements mentioned in the New Anglia Local Enterprise Partnership 2014 Strategic Economic Plan specifically the Great Eastern Main Line, Felixstowe – Nuneaton freight line and Felixstowe to Ipswich Branch Line.	Northern Fringe Protection Group	It is not necessary to refer to every future infrastructure project within the table.	None.
Para. 10.12: implementation details pertaining to the housing development phasing contained in the Ipswich Garden Suburb supplementary planning document should be included in this section to complement the detailed infrastructure phasing information already in this section.	Westerfield Parish Council	It is not necessary to repeat the detailed infrastructure requirements set out in the Supplementary Planning Document in this section.	None.
Para. 10.12: in order for the necessary increase in healthcare capacity to be delivered to support the development, and for sustainable development to be delivered, a new developer funded health centre would need to be provided within the proposed Northern Fringe Garden Suburb District Centre.	Lawson Planning Partnership Ltd	It is agreed that this should relate to the provision of a health centre rather than a reserved site for a health centre.	Amend policy CS10 to refer to provision of a health centre rather than a reserved site for a health centre.

<p>Requested that Table 8B is amended to reflect the healthcare infrastructure required to mitigate the healthcare impacts arising from the proposed development (as set out in the NHS submission to the Ipswich Northern Fringe SPD Issues & Options document, 22nd Feb 2013).</p>			
<p>Para. 10.12: regarding Table 8, the trigger point for any strategic improvements to the sewerage system should be the completion of a pre-application water quality assessment by Anglian Water for the proposed Ipswich Garden Suburb.</p> <p>Recommend Table 8B is amended to include a requirement for a pre-application water quality assessment to be carried out.</p> <p>The findings of this assessment should then serve to act as a trigger point for any strategic improvements to the sewerage system and sewer network capacity.</p>	<p>Environment Agency</p>	<p>Application requirements set out in the Supplementary Planning Document Interim Guidance (2014) includes a Utility Infrastructure Report as part of the Environmental Impact Assessment. Anglian Water does not object to this trigger point.</p> <p>Developers and Anglian Water are in discussion on what capacity improvements will be required.</p>	<p>None.</p>
<p>Table 8B: support the range of infrastructure identified for the full Northern Fringe site. This has been informed by significant masterplanning work. Welcome flexibility that is built into this table, however it is appropriate to monitor the site's requirements and regularly review practical / cost matters to decide on the best way to deliver the objectives for the site. Agree there can be variations from Table 8B introduced through the Infrastructure and Delivery</p>	<p>Crest Strategic Projects</p>	<p>The footnote to Table 8B provides for this flexibility.</p>	<p>None.</p>

Plan, for agreeing with the Council.			
Table 8B: the triggers for infrastructure provision are welcomed but they should not become barriers to further development. This could be the case in the provision of the railway bridge. Would not want to see development stop when 300 houses are finished on Henley Gate.	The Ipswich Society	The viability assessment carried out as part of the production of the Supplementary Planning Document confirmed that the infrastructure requirements are viable at this point in time.	None.
Table 8B: support the inclusion of Table 8B but have a number of concerns. Provision of the country park and associated facilities must be included; traffic management scheme for Westerfield should also reference Whitton and The Dales; enhancement to school playing fields should include the agreement of an access plan to enable community use of facilities; Travel Plans should be required to include the commute from the Northern Fringe to new jobs with Ipswich Policy Area. Need to ensure infrastructure provision is not prevented by triggers not being reached e.g. rail crossings, schools, sewerage, especially in light of multiple starts / cumulative development.	Northern Fringe Protection Group	<p>It is agreed that reference to the Country Park should be included within Table 8B.</p> <p>As identified in the Supplementary Planning Document Interim Guidance (2014) traffic management schemes will be informed by the Transport Assessment for the whole development. This recognises that schemes may be required in 'other locations'.</p> <p>The Supplementary Planning Document Interim Guidance (2014) identifies that some education facilities should be made available for community use.</p> <p>The viability assessment carried out as part of the production of the Supplementary Planning Document confirmed that the infrastructure requirements are viable at this point in time.</p>	Add reference to the Country Park in Table 8B.
Table 8B: support the Northern Fringe Protection Group comments on proposed	Save Our Country Spaces	Mitigation measures for air and noise impacts would be identified	None.

<p>Table 8B. Its inclusion is supported but revisions are need. Suggest adding a requirement for a railway noise buffer.</p>		<p>through Environmental Impact Assessment submitted with individual planning applications which is included as a planning application requirement in the Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014). This would be too detailed for the Core Strategy and Policies DPD.</p>	
<p>Chapter 11: Key Targets associated with Part B</p>			
<p>Para. 11.6: reference to buildings at risk is welcomed, but the national register now covers all designated heritage assets on a Heritage at Risk (HAR) Register. There should be a related target to this indicator stating that the number of assets on the HAR Register should be reduced. Other indicators / targets could include the number of up-to-date conservation area appraisals and management plans, and / or the number of planning decisions made in accordance with officer / English Heritage advice.</p>	<p>English Heritage</p>	<p>Feel that reference to the buildings at risk register is appropriate.</p>	<p>None.</p>
<p>Objective 3: up to 12,500 additional jobs could mean anything between 1 and 12,499 and needs to be revised to a specific target for Ipswich Borough if it is to drive forward job creation. Part of the solution to providing 'a decent home for everyone' is upgrading the existing housing stock yet the Core Strategy review fails to address it. Also disagree with the removal of the target for the use</p>	<p>Northern Fringe Protection Group</p>	<p>The objective has been revised to refer to 'in the region of 12,500 jobs'.</p>	<p>Amend the monitoring chapter accordingly.</p>

of Previously Developed Land and suggest one or a number of time related targets are reinserted.			
Objective 4: agree with the objective to focus development primarily in central Ipswich and adjacent to identified district centres. However, this will not be the case for the creation of new jobs with principal growth areas being identified outside the town centre nor for housing development since the Northern Fringe development will inhibit this. The target needs to relate to the land area of the development in order to deliver the objective rather than relating to the number of developments. If the largest developments are outside Central Ipswich then the target could be met without delivering this objective.	Northern Fringe Protection Group	Objective 4 should also refer to development at Ipswich Garden Suburb. The Ipswich Garden Suburb will incorporate a district centre.	Amend Objective 4 to include reference to Ipswich Garden Suburb.
Objective 6: this is out of date regarding the Major Scheme references – does Ipswich Borough Council still report on these national indicators? The objective needs to improve sustainable transport from homes to new centres of major employment with an appropriate target.	Northern Fringe Protection Group	As identified in policy CS1, Travel Ipswich is aiming for a 15% modal shift.	None.
Objective 10: this should include a target to improve educational attainment levels in order to help increase the skills base of future employees.	Northern Fringe Protection Group	Whilst the Core Strategy and Policies DPD can provide a positive framework for the development of schools it has little influence over educational performance.	None.
Objective 11: this indicator 'levels of participation in community events such as the IP-Art Festival' does not relate to the objective of 'a safer, greener more cohesive town'. Better indicators are	Northern Fringe Protection Group	Community participation rates relate to creating a more cohesive town. The target relates to reducing crime in line with police targets.	None.

required, e.g. number of physical crimes reported.			
Objective 12: advocate that the Ipswich Policy Area (IPA) make visible to the general public through Council websites details of meetings, minutes and working documents subject to commercially sensitive information being excluded. One indicator could be the frequency of the IPA Board meetings held per year. The target needs to relate to homes as well i.e. the Ipswich Housing Market Area and its constituent parts. Greater transparency of the work of the IPA Board is required and therefore the Core Strategy must commit the Board to making all its work and papers available to the general public in a timely manner.	Northern Fringe Protection Group	The Ipswich Policy Area has a webpage at www.ipswich.gov.uk/content/ipswich-policy-area . It is not clear what value would be gained from monitoring the number of meetings as it is only necessary for the IPA Board to meet when there are specific items to discuss.	None.
Para. 12.1: would like clarification that the monitoring of jobs delivery within Ipswich Borough, not just the IPA will be undertaken. Have seen no evidence of monitoring of the 'Delivery of jobs within the Ipswich Policy Area' despite several requests for data. The monitoring of jobs data should specifically identify the net new jobs created in Ipswich Borough and in the central Ipswich 'IP-One' area.	Northern Fringe Protection Group	The number of jobs to be created in Ipswich will be monitored through the arrangements proposed under Objective 3.	None.
Appendix 7: it would be helpful if the definition of the Ipswich Northern Fringe along with the three areas referenced in Table 8B were added to the Glossary. It would also be useful to add New Anglia Local Enterprise Partnership (NALEP) to the list and the Glossary.	Northern Fringe Protection Group	It is not necessary to add Ipswich Garden Suburb to the glossary as its extent is defined on the Policies map and in policy CS10.	None.

<p>Proposals (policies) map: the revised policies map contains anomalies and certain presumptions on land use, access, land availability and deliverability. The map contains assumptions which appear unsound. Also, the location of the secondary school should be reconsidered on environmental, sustainability and practical grounds.</p>	<p>Save Our Country Spaces</p>	<p>Without further details of the anomalies referred to it is not possible to address these. The identified location of the secondary school is considered appropriate and was a balanced decision for various reasons including: being sited alongside the primary school; providing a buffer between the proposed built development and existing Westerfield village through the siting of school playing fields. The location of the school playing fields are also considered an appropriate land use alongside the railway line and in assisting with the overall drainage strategy for the area.</p>	<p>None.</p>
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