

Potential Land for Development

Issues and Options Topic	Questions	Name	Main Issues Raised Through Comments	IBC Response	REP NO.
	Part 1 Strategic Questions				
Key Issues & SA Scoping	Q1: Are there any other issues that the Local Plan should consider?	Mersea Homes	Ipswich's housing delivery rates have been poor over the last seven years - therefore, housing delivery and viability should be recognised as key issues.	The Council recognises the importance of the issue and has addressed the matter by offering several growth scenarios to bring about debate in the Issues and Options consultation document. The responses and the final draft plan will address the issues of housing delivery and viability, e.g. through whole plan viability testing.	25480
		Ipswich Community Media	Innovative use of older / unused / or seemingly not productive places rather than knocking down - using a premises for arts can generate revenue. The arts are a growing economy. Bring the artists and professional creative into the conversation. We have a 100 Strong professional creative network in Ipswich.	The value of the Arts in helping to create a sense of place and community is understood. "Public Art" is addressed in broader terms in the Policy DMS "Design and Character" and will be the subject of consideration in individual applications, when developer, Council or joint funding can be made available.	25461
		Orwell Ahead	We believe that with a re-thinking of district boundaries, the Orwell Peninsula (Ipswich to Felixstowe) area could deliver ambitious economic growth along with a significant increase in housing numbers. The duty to cooperate is inadequate. We believe there must be a single local plan for the Great Ipswich and Felixstowe area).	The Orwell peninsula will remain an important element in the spatial planning of the Borough. Under the council's duty to cooperate with adjoining authorities the important inter relationships between Ipswich and Felixstowe will be tested and if found inadequate the plan will not be found sound. It is therefore an imperative to resolve the issues of economic growth and housing delivery.	25494
		Suffolk Wildlife Trust	We recommend that the issues are expanded to include the need to secure ecological enhancements as part of new developments.	All key habitats are to be secured by virtue of the Plan Policy CS4 and national NPPF policies that safeguard important ecological assets. Policy CS4 provides for the conservation and enhancement of assets and seeks appropriate planning obligations to secure agreed enhancements.	25001
		On Behalf of Aquigen	It is essential that the emerging Plan promotes and supports growth in key employment sectors. The business sector is an important stance towards the local and wider sub-regional economy. The Plan should also however recognise the importance of other employment sectors including retail, leisure, entertainment and recreation.	Comment Note: for the plan to found sound it needs to develop a broad and supportive stance towards the delivery of economic regeneration and developments; in combination with environmental and social policies. Policies CS13 and 14 in particular offer encouragement for jobs growth in employment uses, including Retail.	25096
		Northern Fringe Protection Group NFPG	Are Babergh and Mid-Suffolk prepared to work with Ipswich and Suffolk Coastal to address cross-boundary issues and deliver additional homes? Add reference to increasing levels of violent crime in Ipswich and fear of personal safety (especially at night). Falling house sales in Ipswich caused by e.g. stamp duty changes and people choosing to extend. The poor coordination of utility works. A permit system is urgently required to minimise disruption. Ipswich has sub-standard cycling infrastructure, which requires major improvement in order to encourage sustainable travel and reduce congestion. Ipswich now has five AQMAs. The need to create more high-quality and better-paid jobs to improve the economy. Assess the impact of BREXIT on the SHMA.	The groups concerns are noted and will be addressed as part of a range of policies that are being developed. These policies are required to be developed under the duty to cooperate which will be tested by an Inspector at Inquiry. The local plan will address those matters raised where land use planning policies can have an impact. Development management policies will be unable to deal with non-planning matters such as the impact of Brexit or house prices.	24954
		Save our Country Spaces SOCS	Falling house sales in Ipswich (50% over last two years). Population adjustments due to Brexit and shifts in population and local Ipswich demographic. Acknowledge and factor in the stark reality of the jobs and employment situation and trends within Ipswich. Factor in post-Brexit increases likely in food prices, food security and the need to grow more at home; the terrible loss of Grade 2 farm land in North Ipswich. Ipswich cycling infrastructure requires major improvement to encourage sustainable travel and reduce congestion. However, poor Air Quality in key areas works against a successful cycling, walking strategy and Public Health thrust.	Please see comments above	25034
		Historic England HE	We welcome the identification of the high number of heritage assets in Ipswich and Suffolk Coastal in the environmental considerations. However, what this means is not elaborated on. The 2016 Local Authority Profiles note that Ipswich alone has 457 listed buildings, 8 scheduled monuments, 3 registered parks and gardens, and 15 conservation areas. This is a significant number of designated heritage assets in a tightly bounded authority, reflecting Ipswich's long settlement history and historic development. It is not just the high number but also the density and significance of the heritage assets which is key.	Comments Noted - The heritage assets are set out in the supporting text to Policy CS4 which will offer appropriate levels of safeguarding.	24892
		On behalf of RSPB	The RSPB welcomes that the Council recognises the network of wildlife-rich sites, species and habitats; the need to invest in renewable energy; recognition of the need to tackle the threats posed by climate change and the foresight to extend and enhance the Green Infrastructure network across the whole Ipswich Housing Market Area (IHMA). The critical element is an overall commitment for enhancing biodiversity and this should be at the forefront as an environmental issue in order to be consistent with the national planning policy framework (NPPF).	The Council welcomes the general support from the RSPB but believes the balance of its approach to habitat and ecological issues is appropriate. The Plan will be read in conjunction with the NPPF which is a national policy document whose framework does not need to be repeated in each plan area.	24691
		Private individual	Social issues need to be a big focus of the plan moving forward. Current and previous plans have clearly failed to address the issues identified as parts of the town have become no-go areas.	The Council and its partner organisations do not recognise the concept of "No-go" areas but accepts that some communities may experience deprivation. The Local Plan will try to promote improvements by providing land for houses and jobs.	24650
		Suffolk Constabulary	Ensuring security and crime reduction measures are a compulsory element of all planning applications. Improving housing standards in the private rented sector, to include minimum security levels. Provision of services for young people to deter them from criminal activity. Enhanced provision of services to support people out of substance misuse. Outreach services for vulnerable people who may either be at risk of being victims or at risk of becoming involved with crime. Increased means of encouraging community integration, especially for communities where English is not the first language. Means of deterring people from repeatedly committing criminal and/or anti-social behaviour (i.e. evicting problem tenants). More effective use of powers to deter ASB/criminal behaviour in communal/public areas such as Jubilee Park, churchyards and parks. Need to consider terrorism mitigation features in all developments. Enhanced CCTV coverage across the town.	Although the reasons are understood the Constabulary has proposed some additional issues for inclusion that are beyond the remit of Land Use Planning. While social facilities may be made available through the delivery of infrastructure explained in the plan and secured through planning obligations some of the additional items are not matters that may be delivered through Land Use Policies. The Council will continue to work with the Police to deliver services and facilities that meet the aims which underlie these comments.	24839
		NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)	Comments on the wider impact of planned growth on all local Health services and infrastructure needs to be coordinated through wider consultation with the health economy and CCG led forums established to inform the Sustainability and Transformation Plan for the locality. The implementation of the plan will result in extensive transformation to the way that health and care services are delivered, potentially including changes to the physical infrastructure. It would be helpful to NHS England and the CCG if feedback received as a result of this consultation to questions 31, 104 and 105 could be shared.	Comments noted. There are a number of means for the objectives of the CCG Sustainability and Transformation Plan to become better integrated with the Council's Development Plan documents. The Consultation documentation will be made public.	24891
		Private individual	Social issues (Ipswich): Need for enhanced, safer access for pedestrians, especially for people with disabilities, to the amenities, shops, offices and public spaces in and around the city centre.	Access and design issues are to be controlled using the revised Policy DM12.	24714
		Environment Agency	Although Ipswich will soon benefit from the new Ipswich Tidal Flood Barrier, there remains residual tidal flood risk from barrier failure as well as fluvial flood risk from the River Gipping and neither should be overlooked. There is no mention of the Water Framework Directive (WFD), and the requirements and obligations laid out in the Anglian RBMP. This links to water quality, but also ecology and amenity. Overall, the plan should give greater consideration to the management and enhancement of the water environment. The existing SFRA does consider the new Ipswich Tidal Flood Barrier and associated works, due for completion by April 2018. It is unclear if there is an intention to undertake a new SFRA, if so we would recommend discussion with ourselves with regard to this work. We are currently preparing new flood models for the River Gipping and the coast and estuaries. These are unlikely to be available until post-submission so they cannot be included in any new SFRA or the Local Plan, but they may need to be taken into account by developers in their FRAs. The Local Plan must also have regard to the Anglian river basin district River Basin Management Plan (RBMP) 2015. The RBMP is referred to in the SA Scoping Report, but it should help underpin and inform policies and approach in the plan. It is not clear if this is the case to date.	The essential tenets of the "Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy" have been used in the drafting of the Council's Policy DM4 "Development and Flood Risk". The Anglian River Basin Management Plan is referenced and explained in the reasoned justification following Policy CS4: PROTECTING OUR ASSETS.	25174
	Ipswich Limited	The Local Plan is too focused on residential aspects with very little regard to employment, environment and infrastructure. Ipswich has significant employment in sectors which are under threat when the UK exits the EU. Ipswich has a significant problem with homelessness there must be inclusion of a strategy to deal with this problem.	The Council believes that there is an appropriate balance between the various aspects of the plan. The Council's Housing Strategy addresses issues relating to Homelessness. The Council will also respond to the Government's Rough Sleepers Strategy published in August 2018.	25256	
	Private individual	One large Council combined Suffolk Coastal, Mid Suffolk, Babergh and Ipswich Council.	The likelihood of further reorganisation to create a single council is not a local plan issue but cooperation between the Councils is required to ensure the correct apportionment of homes and jobs within the Ipswich Policy Area. This "Duty to cooperate" will be set out in a Statement of Common Ground which includes the other authorities mentioned.	25509	
	Private individual	Greater areas for pedestrians in the town centre. Expansion of the shuttle bus service to all leisure centres and commercial services.	The issues raised are the subject of the policy CS20. Suffolk County Council has been unable to continue funding of the Shuttle Bus service and therefore it has contracted.	25520	
	Private individual	Why don't IBC planners understand the local area? My concerns are the planning department are antiquated in thoughts and if it doesn't affect them personally they are not bothered. Offer strange advice which makes me feel they do not understand the local area or community. IBC need to engage directly with the community. Stop reducing light to existing residents by doing away with high-rise. Sunlight helps all. Do we need to infill every spare bit of land with housing? No. There are so many empty buildings and half built things in Ipswich and these should be looked at first. There is nothing for the people of Ipswich to make them stay.	Comments noted - The Core strategy needs to develop policies which deliver new homes and places of employment in Ipswich. This issues and options consultation is the latest of a number of public consultation events that aims to help the public engage with the local plan. The design and layout of future development will need to consider amenity and density of development issues and these matters are covered by a range of Development Management Policies	25505	
Vision for Ipswich HMA and FA	Q2: What are the advantages of your area that should be protected through local plans?	Suffolk Wildlife Trust	The Borough and surrounding areas have a wide network of wildlife-rich sites, ranging from those of international importance (such as the Stour and Orwell Estuaries Special Protection Area (SPA) to those of more local importance. These sites are part of a valuable network and the Local Plan must protect all areas of ecological value. This should include sites designated for their nature conservation interest, including County Wildlife Sites (CWS), and areas of greenspace that, whilst undesignated, contribute to the overall biodiversity value of the area.	Policy DM31 explains the hierarchy of protection that may be afforded to the range of key natural habitats and geodiversity interest sites in the Borough. County Wildlife sites are identified in the proposal maps and a network of ecological sites is encouraged.	25002
		Northern Fringe Protection Group NFPG	Due to the confined boundaries of Ipswich Borough, there is an urgent need to protect existing green and open space and improve usability.	Comments noted - please see comments above. The Local Plan promotes the protection of Open Spaces in Policy DMS of the Preferred Options document.	24955

	Greenways Countryside Project	This area benefits from a spectacular natural environment with internationally important wildlife populations and habitats. This resource contributes hugely to the quality of life for residents and is not replaceable, so should be protected at all cost.	Comments noted - please see comments above. The Preferred Options will also promote care of the Natural Environment through Policies CS4 and DM8	24935
	Suffolk Preservation Society	A high quality historic environment rich in designated and non-designated heritage assets including listed buildings, conservation areas and parks and gardens. The Borough abuts the Suffolk Coasts and Healths Area of Outstanding Natural Beauty, a nationally designated landscape, and impacts of development on the setting of which should be accorded full weight in the development plan.	The Borough's wealth of Listed Buildings and its 15 Conservation Areas are recognised and protected in the Preferred Options DPD in Policy CS4 and DM13. Similarly, the important Suffolk Coasts and Healths ACNB is afforded protection by Policy DM11. When coupled with the National Guidance contained in the NPPF the Plan is considered sufficiently robust to protect in the manner expected by the SPS.	24694
	Historic England HE	Ipswich has a rich historic environment and policies should be based on a clear understanding and recognition of the importance of this to the quality and distinctiveness of the town as a whole. This requires a strong evidence base though any evidence base should be proportionate. However, with a local plan we would expect to see a comprehensive and robust evidence base to support policies. Sources include: National Heritage List for England; Heritage Gateway; Historic Environment Record; heritage at risk registers; locally listed heritage assets; conservation area appraisals; historic characterisation; archaeological assessments; topic papers; (list continues)	Comments noted. The Council considers that the evidence base, including Conservation Area character appraisals and urban character studies to be strong. It is also adopting an Archaeology SPD linked to the new urban archaeological data base which together shed more light on the town's past and evolution.	24895
	On behalf of RSPB	A network of wildlife-rich sites around and through the borough recognised through the highly commendable Ipswich Wildlife Network.	Please see comments to entry 25002 above.	24647
	Ipswich Wildlife Group IWG	The area includes many important natural environment sites that should be protected in their current state. It holds important wildlife and habitats that make a significant contribution to the quality of life for residents.	Please see comments to entry 25002 above.	24819
	Suffolk Constabulary	Good provision of quality urban parks and associated historic buildings, providing a recreational and educational resource.	Support welcome	24840
	Private individual	The main advantages of Ipswich Town Centre include the variety of commercial buildings, shops and historic buildings. These should be preserved and protected and access to public spaces and buildings should be improved for all. I look forward to a town centre that is friendlier and more accessible for pedestrians, especially people with disabilities.	The Policies address accessibility e.g. Preferred Options Policy DM12, and will be supported by the Public Realm Strategy SPD currently being prepared.	24715
	Private individual	My area (Copdock & Washbrook) is just outside of Ipswich and currently forms part of a green belt around the Town and should be kept as such. Rather than being overwhelmed with housing and industrial development.	Comment noted - the boundaries of the Borough are described in the proposals map and the policies seeking to prevent development outside would be set out in neighbouring Council's Local Plans.	24741
	Private individual	Open spaces and allotments are important to a town such as Ipswich which has tight boundaries and very little space to expand. They help break up the 'townscape' and add character. The town's heritage is also important, particularly given the many listed and non-designated buildings. The further conversion of pubs to retail use should be resisted.	Allotments will continue to be protected and new provision requested in development via policies DM5 and DM6 respectively. Public Houses are the subject of the broad protection offered by Policy DM23 -Protection and provision of Community Facilities - this policy now includes a requirement that a marketing strategy, for the public house, must be agreed with the Local Planning Authority prior to applying for planning permission for change of use or redevelopment.	24765
	Environment Agency	The River Gipping as it flows through Ipswich and the Orwell estuary are overlooked in the Plan. The River Gipping in Ipswich is a neglected asset that is not accessible to people. It is a degraded environment that is hidden from view and not celebrated as one of Ipswich's key assets. The new Local Plan for Ipswich should include proposals to enhance the visual and ecological quality of the river and estuary, engage people with the river and detail how water quality will be maintained and improved in the river while the population of Ipswich increases. Developers proposing to build on land adjacent to the river should contribute to improving the water and habitat quality in the river. This should include contributing to the cost of removing redundant in-river structures that are of poor visual quality, are a health and safety and maintenance liability and prevent the free movement of fish and eels in the river.	The river path along the Gipping links the Waterfront to Sproighton and is well used. The Plan includes proposals for bridges to link with it. A new opportunity area has been identified with the aim of improving access along the River Gipping at West End Road. Therefore the council cannot agree that the River and estuary are overlooked.	25186
	Pigeon Investment Management Ltd	Good network of parks and green spaces. Good transport links by rail to London and road via the A12 and A14 which can encourage business growth. Mixed economy of office, industrial uses and working docks. University that can educate a local workforce. House prices in the Borough are not as high as other nearby areas in Essex, West and East Suffolk and Cambridgeshire making the town more affordable and thereby assisting businesses in recruiting staff. The provision of new housing to meet the objectively assessed need of the housing market area will ensure that housing remains affordable.	Commentary and support noted- The Housing requirement will reflect the Government's new methodology.	25357
Q3: What are the disadvantages of your area that the local plans could try to address through the way land is used or developed?	Ipswich Community Media	We have a sorely neglected area that has an estate with many boarded up areas; perhaps it would be fruitful to address a route to have community facilities that can bring safety, life and hope to some of these emerging communities? A long-standing empty boarded pub? Could communities be supported to understand how they might be empowered to use it? Green areas - proven to bring a different energy to people, health wellbeing and areas.	Comments noted. The Council is willing to explore the possibility of designating community assets such as a key community building when they become redundant. Although this would not be a matter for the DPD further details may be found on the Council's web site.	25462
	Northern Fringe Protection Group NFFG	Transport/congestion/poor sustainable travel options and air quality. Lack of high quality jobs and the need to improve green space/corridors.	The Preferred Options Core Strategy and Policies Document offers policies and proposals which cover each of the issues raised. A new policy concerning Air Quality is proposed.	24956
	Save our Country Spaces SOCS	Transport/congestion/poor sustainable travel options and air quality. Lack of high quality jobs and the need to improve green space/corridors.	The Preferred Options Core Strategy and Policies Document offers policies and proposals which cover each of the issues raised. A new policy concerning Air Quality is proposed.	25035
	Suffolk Preservation Society	A number of brownfield sites along Star Lane and Grafton Way which interrupt the connectivity between the historic core of the town and the Waterfront. Environmental improvements to these important streets would facilitate the regeneration of the town.	Ipswich Town Centre and Waterfront - Public Realm Strategy was published in March 2018 and features analysis and proposals for the suggested areas. In this context no further changes to policy are suggested. Sites e.g. Turrett Lane, are allocated for development through the site allocations plan.	24695
	Tuddenham St Martin Parish Council	The development restrictions on villages included in the category of 'Other Village' in the Settlement Hierarchy classification sterilises any improvement of the village and prevents any housing development. Tuddenham St Martin Parish Council has strong objections to any potential plots identified which would add to the physical separation of villages from Ipswich and also have a negative impact on the highway infrastructure and limited school provision in the area.	The settlement hierarchy that includes Tuddenham St Martin features in the local plan for Suffolk Coastal. The Plan retains the strategy to support the identity and separation of villages. Policy DM11-Countryside but land at the edge of the Borough will be needed to meet housing needs.	24922
	Historic England HE	Further work to improve the evidence base on the Ipswich Waterfront and its connectivity to the town centre. The strategic direction for this area lacks clarity with the layers of the Ipswich Vision, IP-ONE areas and individual site allocations. The relevant conservation area appraisals are notably out of date and the key area of connectivity between them is not covered by a conservation area, despite the significant heritage in the area. See also answer to Question 85.	HE's position is noted. Conservation Areas are being reappraised currently. The Merchant Quarter opportunity area covers the area between the waterfront and the centre.	24896
	Private individual	Large areas of Ipswich remain undeveloped and a great focus should be placed on developing these. A number of retail units along Duke Street and Stoke Quay remain empty years after the developments were completed - this should act as a warning that the approach used here does not work.	The Council is encouraging the reuse of previously developed land with a number of promotional policies. These will provide a framework for the delivery of regeneration of sites in Ip-One and other key sites.	24651
	Suffolk Constabulary	Town centre has numerous empty premises which attract ASB and criminal behaviour. Lack of community cohesion, especially amongst those who do not speak English, leading to isolation. Lack of appropriate facilities for young people. Housing vulnerable people and those inclined to criminal/ASB activity together (i.e. in the same block of flats)	Comments and concerns noted. The solutions can only be addressed in part by a land use planning document. Policies aim to provide flexibility to enable appropriate new uses to be found for vacant buildings.	24841
	Private Individual	There is an urgent, pressing need for an ambitious project that will a) reduce the number of road vehicles circulating around the town centre, especially through College Street and Star Lane, b) join up the Waterfront with the town centre by creating more pedestrian/cyclist areas and c) transform the unsightly brown sites close to the Waterfront through intelligent, cost-effective development.	The Council will consult on the review of the IP-One AAP for the core of the Borough. Policy CS3 sets out the objectives for the Plan and will promote the changes which this submission is seeking.	24716
	Private Individual	The dual carriageway Old London Road leads on to Chapel Lane / Swan Hill. It is overwhelmed when there are problems with the Copdock Interchange and when accidents or closure affect the Orwell Bridge. Anything other than small scale development will add to traffic problems. The road infrastructure needs attention before any large scale building is approved.	Comments noted. The Plan is supported by transport modelling which indicates that waiting times at some junctions will increase at peak times. The plan includes sustainable transport proposals to help address this.	24742
	Private Individual	Continuing expansion of retail centres and business parks on the east side of Ipswich act as honeypots for more traffic congestion. The local plan should aim to bring greater focus to the town centre and the Waterfront area. There remains undeveloped land between the town centre and the Waterfront area and on the Waterfront itself. The one way road system between the town centre and the Waterfront badly needs improvement.	Comments noted please see response to the point above.	24786
	Pigeon Investment Management Ltd	The town has not reached its potential in terms of retail or employment growth. The amount and type of new housing delivered in the Borough has been constrained for many years with under provision of good quality family housing as a result of the focus on high density development. This has constrained retail and employment growth. If projects like the northern fringe had been started say 15-20 years earlier then the growth of housing would have helped enhance the town centre through increased demand for retail services, and would have improved the local employment base by providing a greater workforce.	Each of the topics raised in the response, (housing, retail and employment) are the subject of market forces that will determine the timing and delivery of development. These influences are beyond the control of planning policies as are the continuing and fundamental changes that are being made to the way that we shop.	25358
Q4: What are the key priorities you would like to be addressed by 2036 - in the places across Ipswich and Suffolk Coastal where you live, work or study?	Orwell Ahead	New Anglia LEP Board representation for Ipswich & Felixstowe area should never fall below 30% (or below our zone's percentage of GVA for Norfolk & Suffolk). There should be a permanent New Anglia LEP board position for the Felixstowe Port Users Association or the Port of Felixstowe. Ipswich Borough Council should re-join the Haven Gateway. New Anglia LEP should be working in greater partnership, or association, with Haven Gateway. All parties should make it a priority to lobby for a Greater Ipswich Orbital (Northern Bypass) in the next government spending round. We are urgently calling for a business and academic led member group dedicated to the successful growth of Greater Ipswich & Orwell. Ipswich Policy Area must have permanent and proportionate representation at SCC cabinet (or Committee) level.	The Council's decision to withdraw from the Haven Gateway Partnership does not affect the way in which the high level economic issues raised are considered. The duty to cooperate and the Ipswich Strategic Planning Area board meetings are held to coordinate planning related matters between IBC, Babergh/Mid Suffolk, Suffolk Coastal and the Suffolk County Council. This means that the issues mentioned are properly discussed and monitored. The Council will prepare and publish a statement of common ground to explain how the Duty to Cooperate has engaged the Council's in aligned plan preparation.	25495
	Suffolk Wildlife Trust	In relation to the top priorities identified for Ipswich Borough we recommend that a definition of 'sustainable' is included in the document. In relation to the environment, this should include the priority to create a thriving, enhanced natural environment for the benefit of people and wildlife.	The Core Strategy and Policies Document offers policies and proposals which cover the way in which the Council is seeking to deliver its responsibility for sustainable development. Further definitions of Sustainability are considered likely to duplicate these and the guidance offered by the NPPF.	25003
	On Behalf of AquGen	In order to achieve the level of consistency required, we recommend that any development targets identified in the SEP are aligned with the Evidence Base and eventual set of targets selected for the Local Plan. This will clearly need to be the subject of review and consideration as the Local Plan evolves.	Comments noted. The economic evidence for the plan includes sector needs assessment.	25097
	Suffolk County Council SCC	Under Questions 4 and 5, the Borough Council should be aware of the County Council's Corporate Priorities set out in 'Our Priorities, 2017-21'. They are consistent with the NPPF and of direct relevance to this Plan. The SCC priorities are inclusive growth, health, care and well being and efficient and effective public services. The priorities are relevant to NPPF statements.	Comments noted and accepted	25447

Northern Fringe Protection Group NFG	Infrastructure, infrastructure and infrastructure. In particular, road improvements to ease congestion and measures to improve air quality. It is clear that existing infrastructure - especially the transport network - is already failing. It is also important to deliver high quality jobs thereby increasing the average wage of Ipswich residents and to protect the decreasing green areas in Ipswich Borough. All these measures have an important role to play in improving the health and well-being of Ipswich residents. Further expansion of Ipswich must be accompanied by infrastructure improvements.	The important role that infrastructure plays in creating sustainable development is accepted and the Council will continue to work with its partners to deliver a mix of initiatives to support development. The infrastructure needs of the plan period will be published as part of the draft plan.	24957
Save our Country Spaces SOCS	SOCS feel the entire thrust of the Local Plan growth and expansion agenda is inherently unsustainable. A clear and unequivocal determination of the wider infrastructure needs together with a reliable identified funding stream to meet these needs has to be determined and established first.	Please see comments above	25036
Suffolk Preservation Society	Focus on the historic environment as a key driver for regeneration of the town's economy	The Council recognises the importance of the Borough's history and will bring forward projects to enhance the town's historic environments in its "Public Realm Strategy". This is being prepared in conjunction with Conservation Area re-appraisals. In this way the Council expects to achieve a high degree of prominence for the historic environment among the range of economic drivers for regeneration.	24696
Private Individual	2 priorities for Ipswich. A) Redevelop the cycle network to make it easier for people to cycle, e.g. a direct route into town from the east. Encourage people to cycle from a to b instead of drive by giving them a serious credible option: a proper lane that is smooth, flat and separate from traffic. B) Re-evaluate the supply/demand for the main town. People go to the town centre for an experience and that has to be unique rather than replicating all other towns. Develop spaces for small retail, boutique businesses and specialist start-ups to thrive in.	A) The Council supports the provision and development of a cycle network for Ipswich and has adopted a cycling strategy SPD. In certain areas of the town provision may be constrained by historical residential development and the highway layout. The Council will continue to seek new opportunities to enhance the network as development proposals are brought forward on an individual basis. It should be noted that the Borough Council is not the Highway Authority and so does not have control over the existing highway network. B) The Core Strategy and Development Management document includes policies to safeguard the existing network of district centres and the core of the town centre. The creation of premises for a certain type of shop would be a matter for market forces and is a matter for the developer to determine rather than a local plan.	24783
Private individual	More well paid jobs brought into the area. Expand on the success of the University of Suffolk. Create a safe and vibrant night-time economy.	Recommended priorities noted. The Council will seek to incorporate these three overarching priorities in the relevant policies of the Local Plan Review. A DM policy covering the night-time economy is being produced.	24652
Suffolk Constabulary	Designing Out Crime standards to be compulsory for all new developments and redevelopments, at the earliest opportunity and in any sector. Action taken to protect/enhance public open spaces such as parks and churchyards to deter criminal/anti-social behaviour. Action taken to prevent buildings being out of use for extended periods (i.e. former pubs/shops etc)	The Council already recognises the importance of securing quality, safer environments by engaging with the Constabulary and the Architectural Liaison Officer in both Development Management and Major Project work. The Local Plan and Infrastructure delivery programme and s123 schedule of infrastructure needs will be the subject of further consultation if the Council proceeds with the Community Infrastructure Levy.	24842
Private Individual	My priorities for the area where I live (St Nicholas Street): safer roads for vulnerable road users (pedestrians, cyclists, wheelchair users etc.), better air quality.	The Core Strategy and Policies Document offers policies and proposals which cover each of the issues raised. A DM policy covering Air Quality is being produced.	24717
Private Individual	Infrastructure.	The Core Strategy and Policies Document provide guidance and support for the delivery of Infrastructure and the Council will publish an Infrastructure Delivery Programme and s123 list of Infrastructure needs if the Council proceeds with the Community Infrastructure Levy.	24743
Private Individual	The one way traffic system needs serious attention. I am not convinced replacing roundabouts, which allow a degree of free movement, with traffic signals, such as on Princess Street, actually contributes to any improvement in traffic movement. Rather the reverse.	Comments noted. The Borough Council is not the Highway Authority and so does not have control over changes to the existing highway network such as the example referred to.	24767
Environment Agency	We would wish to see Local Plans for Ipswich and Suffolk Coastal that take a holistic approach to sustainable development that benefits people, the environment and the economy. Open landscape is recognised in this plan as an opportunity to create habitat and reduce flood risk, but the provision of multifunctional open space also has the potential to improve a community's physical health and mental wellbeing, and increase the monetary value of new development. The wider benefits of ecosystem services should be recognised, and the Plan should seek to both protect and enhance the natural environment.	The Council will build many of the principles of sustainable development into its project proposals. The Council intends to maintain its commitment to the "green rim" for the borough and include the North Ipswich Country Park within the Ipswich Garden Suburb.	25177
On Behalf of Bloor Homes	Working collaboratively with neighbouring authorities on cross-boundary issues, including in relation to meet housing needs, should be a key priority for Ipswich Borough Council, particularly given the constraints of existing administrative boundaries. We note the collaborative approach being undertaken by Suffolk Coastal District Council and Ipswich Borough Council in seeking to address housing need, and commend such an approach. Clearly, there is a strong functional relationship between Ipswich and Suffolk Coastal District and it is entirely appropriate (as per the NPPF) for the authorities to work together to ensure development needs are met sustainably.	The Council will work with neighbouring authorities where appropriate and where it has been identified that development could be secured through a cross-boundary arrangement. A Statement of Common Ground will be agreed between the Councils that are aligning their Local Plans under the duty to cooperate. Policy ISPA1 covers the need to plan strategically across the Ipswich Strategic Planning Area.	25220
Ipswich Community Media CIC	An exciting cultural offer that comes from the grass roots	The Council will protect Community and Arts facilities through the local plan policies.	25246
Ipswich Limited	Two tier local government doesn't work. The entire south east area of Suffolk deeply relies on each other, however, infrastructure, public transport and joined-up planning is appalling or non-existent. Many places have got out of this mess through a unitary authority. Ipswich desperately needs serious road infrastructure upgrades. Unfortunately the only proposal on the table - an Upper Orwell Crossing is not suitable. Ipswich needs to establish its own science park and/or tech park. Emphasis should be against retail parks and light industrial estates. Suffolk should exceed as being a county with its own highly successful tech cluster county-wide. With developments of a film studio at Bentwaters in the pipework, Suffolk can soon become the Suffolk Powerhouse it should be.	The opinions concerning local democracy are noted but beyond the Local Plan remit. The Borough will continue to work on a range of transport related and Highway improvement initiatives in conjunction with the County Council with the aim of delivering a transport and road network capable of complementing the town's anticipated development. Delivery of science parks and other forms of development to create a vibrant and successful local economy will be dependent on the success of local infrastructure delivery and is allowed for by policies for employment areas and the education quarter.	25257
Private individual	Stop reducing light to existing residents by doing away with high-rise. Sunlight helps all.	Comment noted, however, some higher density development must be expected within the borough boundaries if its government-led targets are to be achieved.	25533
Private individual	In 2036 I would like Ipswich to have celebrated several years of the roads being cycle safe with designated lanes separated from electric vehicles, primarily public transport and essential services.	These aims are at the heart of several infrastructure projects that will be proposed in conjunction with the Highways Authority.	25530
Private individual	Invest in the marina so it becomes a vibrant place to go for all ages. Far less congestion Invest in the high street More focus on reducing crime, Ipswich feels far too unsafe after 6pm.	The Policy for the Central shopping area encourages uses which will bring more people to use the centre after the shops have closed and a night time economy policy has been added.	25503
Private individual	Link the Waterfront to the town centre. Improve the leisure offering in the town. Solve the inner ring road traffic. Promote cycle routes.	The link between The Waterfront and the Town centre is a key element of the emerging Supplementary Planning Document - the Public Realm Strategy	25521
Private individual	Have a cycle track and footpath from Stowmarket to Ipswich waterfront.	The Council supports the provision and development of a cycle network for Ipswich. There is already off-street cycling provision along the river towards Stowmarket but at the current time this does not provide a complete link. The Council supports, in principle, the necessary changes to infrastructure to enable a complete link to be provided, but it should be noted that the Council has no control over planning matters outside of the Borough of Ipswich. The public footpath already exists.	25531
Private individual	Make Ipswich a place where people want to be. Areas of Ipswich are rundown with no community spirit, no local amenities or places to meet.	The Plan includes policies for the promotion of recreation and leisure. The Council will also try to improve community life as part of its Infrastructure Delivery.	25500
Private individual	Install posts next to the grass verges in roads in and out of the town centre to stop people parking and ruining the verge, it gives a poor impression to visitors.	Comments noted, however this would be the responsibility of the Highways Authority.	25527
Q5: What is your vision for the Ipswich HMA and Ipswich FEA by 2036?	Ipswich Community Media Address our desperate lack of suitable art spaces: Studio spaces - art centre - grass roots - run by all the community. Prosperous arts / creative scene - that brings tourists to the town - use of old buildings, supporting growth through hope, creativity and skills. Culture leads development - has been hugely successful in many other centres around the UK. Nourishing and enriching environment - green areas supported and developed. Everyone has access/has a say - routes to securing a balanced wellbeing spaces and centres (town centre hub). Affordable housing - immediately needed. Empty premises being used as homeless or affordable living. Empty spaces adopting the Camelot scheme - like other cities and towns - where people become effective landlords for empty spaces.	The Council continues to support the Arts as a cultural community focus and will explore further delivery as opportunities arise during the development plan process. The delivery of affordable homes remains a priority for the Local Plan process.	25463
Suffolk County Council SCC	The County Council has endorsed the New Anglia New Economic Strategy and will work with partners (including Ipswich Borough Council) to implement the strategy. The County Council is also a partner in delivering the Ipswich Vision, so is committed to enhancing the role of Ipswich Town Centre as retail and service centre for the whole county.	Comments noted and welcomed. Both documents are referenced in the plan.	25446
Suffolk Constabulary	Designing Out Crime standards to be compulsory for all new developments and redevelopments, at the earliest opportunity and in any sector. Action taken to protect/enhance public open spaces such as parks and churchyards to deter criminal/anti-social behaviour. Action taken to prevent buildings being out of use for extended periods (i.e. former pubs/shops etc)	Secured by Design is an important method of creating safe places to live work and enjoy recreation. The Council will continue to promote the enhancement of its local communities with physical and other improvements when ever its powers allow. The measures anticipated are not all capable of being controlled by land use policies.	24843
Private individual	My vision: Streets for People. (Ipswich is currently a thoroughfare and massive car park for road vehicles.)	Concern noted. The Council is currently working with Suffolk County Council to prepare the Local Transport Plan for the region.	24718
Private individual	The plan is looking to "matches the aspiration of all households". Any plan must include a mix of housing. So that when younger members of the community have outgrown their starter home and wish to aspire to move to bigger and more expensive property - it can be available in Ipswich. Building just small starter and social housing will not create a mixed community just one that only meets some needs and will restrict Ipswich's future potential.	The Council seeks an appropriate mix of homes within its policies, however, the system is market-led and the constraints of the market means that developers are best placed to determine the mix of housing which they wish to build.	24744

	Private individual	A vibrant and buzzing town centre and greater transparency on development of key areas such as the Island site and undeveloped areas in the Waterfront. A better followed up local plan so that proposals for land use come to fruition much earlier than has been the case with previous local plans which promised much but either failed to do so, or have been delivered in piecemeal fashion.	Comments noted. Development has now resumed at the Waterfront and the "Island site" remains a proposal in the Plan.	24768
	Pigeon Investment Management Ltd	The employment and retail offer of the town will have grown supported by housing growth at a level to meet the objectively assessed need and of housing types that meet local needs and the development of which is not constrained by administrative boundaries.	The key elements of this view are being sought through the Local Plan policies and cross border working secured by the duty to cooperate.	25359
	Ipswich Limited	The boundary of Ipswich needs to be expanded as a matter of urgency. This Greater Ipswich needs two MPs, should be a unitary authority. The Ipswich Central BID needs to be abolished. Infrastructure needs to be an urgent priority. A dual carriageway Northern Bypass, rail network expansion and Copdock Interchange junction upgrades as a minimum. Park & Ride needs to be revisited understanding the concept requires subsidy rather than being self-sustainable.	Please see above - Concerning the political commentary, the planning system is incapable of influencing local democratic issues which are within the purview of the Boundary Commission.	25402
How much growth? Q6: and 6a: Which growth scenario should we plan for across the Ipswich Housing Market Area?	Mersea Homes	Publication of the Government's "Planning for the right homes in the right places" consultation proposals post-dates publication of the Ipswich consultation. Whilst the CLG standard methodology indicates that Ipswich's own OAN number might fall, all three adjoining authorities' numbers increase. The need for a joint planning approach demonstrates the complexity of demographic, economic and housing interactions across administrative boundaries, and in light of the CLG consultation, we wish to reserve the right to comment on detail about the growth scenarios. That said, Ipswich has been underachieving and under delivering in respect of housing supply and we fully support the ambition expressed in the Norfolk and Suffolk Devolution agreement to substantially increase housing supply, and on that basis, would support Scenario C - High Increase in Growth pending further clarity on the government's consultation.	Support for the higher growth scenario and other comments and concerns noted. The standard methodology for assessing housing need has been established through the NPPF and this sees the housing figures rise for Ipswich Housing Market Area.	25481
	On Behalf of The Kesgrave Covenant	We concur with the approach taken in the Issues and Options document of only consulting on levels of growth that at least meet the full Objectively Assessed Need (OAN), as there is no basis for delivering less than the full OAN. We note that under the draft standard methodology recently published by DCLG, the combined total for Ipswich and Suffolk Coastal is broadly similar to the level of OAN being consulted upon, which suggests that an OAN in the order of 21,000 new homes for the joint area is appropriate.	Please see comment above. The standard method results in housing need for Ipswich and Suffolk Coastal of just over 19,000 homes over 18 years	24858
	On Behalf of Aquigen	As a landowner and investor in the Ipswich area and wider sub-region, Aquigen is supportive of the ambitious growth scenarios identified in the consultation document. Aquigen does not have a specific view at this stage on the growth scenario that should be adopted. Instead, given the nature of their land interest, their focus is on the actual implications for site allocation decisions.	Comment Noted	25098
	Northern Fringe Protection Group NFIG	None of these, as they take no account of BREXIT and of the Government's most recent Housing White Paper. A more realistic growth scenario based on the Government's White paper target and the Experian jobs target should be adopted, which we note is far higher than historic trends. We have a number of concerns with the underlying evidence basis for this section in relation to the OAN for the Ipswich Housing Market Area (HMA) and individual local planning authorities which has been assessed through a SHMA report, May 2017. [Please see full comment for more detail].	For the Council's Local Plan work to found "sound" it will need to be guided by the Government's Planning Policy Guidance and the National Planning Policy Framework which has now established the standard method for calculating objectively assessed housing need.	24958
	Save our Country Spaces SOCS	None of these, as they take no account of BREXIT and of the Government's most recent Housing White Paper. A more realistic growth scenario based on the Government's White paper target and the Experian jobs target should be adopted, which we note is far higher than historic trends. We have a number of concerns with the underlying evidence basis for this section in relation to the OAN for the Ipswich Housing Market Area (HMA) and individual local planning authorities which have been assessed through a SHMA report, May 2017. [Please see full comment for more detail].	ditto	25069
	Greenways Countryside Project	Scenario A, the lowest growth option is the most appropriate for this area, due to the limited infrastructure and important natural environment.	The standard method now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	25341
	Suffolk Preservation Society	SPS believes that the Baseline, Scenario A should be planned for. We believe that to aim for greater economic growth would require a substantial increase in the level of housing that would be undeliverable given the identified constraints on available housing land.	The standard method now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	24697
	Babergh Mid Suffolk	Over recent years Babergh and Mid Suffolk areas have not met their respective levels of housing need due to issues of market strength and scheme deliverability. The future plans would need to ensure that the deliverability of spatial options is robustly tested to demonstrate capability to meet the level of need within the HMA. In this regard it should be noted the diagram set out on pg.27 has not been subject to consideration of constraints and deliverability at this stage. We support the review of employment sites within Ipswich. The outcome of this assessment will be critical to informing options on development capacity within Borough.	Comments noted. Under the continuing process of consultation and the duty to cooperate the SHEELA should clarify these issues and the plan is subject to whole plan viability testing.	25399
	East Suffolk Travellers Association	We consider that Scenario B, the Medium Growth Forecast, is a realistic one. Ipswich is one of the key centres of population and employment in East Anglia, improved rail services to London, Cambridge and Norwich are planned while land and housing costs are relatively low for South East England. The town is therefore ideally placed to attract jobs and housing demand.	Support for the Medium growth scenario noted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	24806
	Ipswich Wildlife Group IWG	The important natural environment and the limited infrastructure of this area suggest that Scenario A with low growth, is the most suitable option.	Support for Lower growth scenario noted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	24820
Private individual	Growth scenario A baseline looks more achievable and indeed deliverable, particularly in the light of constraints acting to protect sensitive locations and changes coming out of the UK's exit from the European Union. Changes in energy production as well as the energy market itself may act against a new nuclear power station at Sizewell. Taking Sizewell out of the equation would have some impact on growth scenarios B and C. In any event growth scenario C is over ambitious and probably unrealistic.	Support for Lower growth scenario noted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	24789	
Railfuture East Anglia	Scenario B the Medium growth forecast. Ipswich is one of the key centres of population and employment in East Anglia. Improved rail links to London and Cambridge are planned during the plan period and currently, land and housing costs are relatively low for South East England. Ipswich is therefore ideally placed to attract jobs and housing demand.	Support for the Medium growth scenario noted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	25008	
Home Builders Federation HBF	The eventual level of housing need to be considered by the authorities in the HMA will also dictate the development strategy adopted. As a minimum, the Councils should prepare strategies on the basis of 'Scenario B'. This is a positive approach towards housing delivery and economic growth that could be supported by the HBF. The Councils should also consider 'Scenario C'. In taking forward such an approach, with large scale strategic allocations, Councils will need to be clear about the timescales required to deliver this level of growth, and support smaller sites for quicker delivery within the first ten years.	Comments concerning Medium growth noted and the need to test the possibility of achieving the higher growth rate is accepted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	25024	
Gladman Developments	It is likely that the Local Plans will need to plan for additional growth beyond that identified in the most recent SHMA to ensure that the economic development ambitions of the area can be achieved through positive plan making. The need to proactively enable sustainable economic growth should be at the forefront of any decision making regarding the future growth scenario.	The wish to see the development of a strategy relating the growth of new homes to similar levels of industrial and commercial development is noted. However, the Council has a duty to respond to NPPF requirements which places an objective assessment of need at the front of the process governing the delivery of new homes.	25110	
Ashfield Land Limited	It is not considered appropriate to plan for the 'baseline' scenario (A). If this scenario was to be progressed, the Local Plan is likely to inhibit future growth across the HMA. Subject to further background work, the level of growth proposed in the 'high increase in growth' scenario (C) would be most appropriate to ensure the required levels of housing and economic growth over the plan period. The 'medium increase in growth' scenario (B) should, however, be seen as an absolute minimum. Any growth scenario must also take account of the substantial need for affordable housing across the HMA. A further reasonable uplift (beyond the economic uplift) should be allowed for to meet the identified need for affordable housing.	Support for the higher growth scenario noted	25038	
Environment Agency	Options 4 and 6 propose Framlingham as a location for 6% and 5% of housing respectively. The sewage treatment works is over capacity already, so it is important to note that further capacity will be required to support growth. The Sustainability Appraisal Scoping Report identifies the need to invest in sewage treatment capacity with regard to an increase in population. The Shared Evidence Base section and SA Scoping Report refer to a water cycle study, and the issue of available foul water treatment capacity should help inform the location and timing of development. When deciding where to locate growth, flood risk is an essential consideration. The SFRA must be used as an evidence base to ensure that development is sequentially sited in areas with the lowest probability of flooding as defined by the Planning Practice Guidance.	The Council is required to provide a complete evidence upon which to confirm the deliverability for its major proposals and the EAs comments are noted and welcomed. The Plan will be informed by the Strategic Flood Risk Assessment.	25176	
On Behalf of Bloor Homes	If the Council were to pursue Scenario A, there is a substantial risk that the Local Plan would become almost immediately out of date and would fail to meet development needs in full. It is suggested that the Local Plan should adopt the approach as per Scenario B, as a minimum. If the Council wish to maximise the plan's social and economic benefits, and the potential for infrastructure improvements, a scenario closer to C should be pursued. It is submitted that the Council should seek to identify potential sites that could deliver the higher growth scenario. Growth should be focussed where the economic and social benefits will be maximised.	The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	25221	
Pigeon Investment Management Ltd	With the progress towards Norfolk and Suffolk devolution Scenario C High Increase in Growth is preferred. This will deliver housing that will contribute to funding infrastructure that the area needs, it will deliver affordable housing and will deliver economic growth.	Support for the higher growth scenario noted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	25360	
Ipswich Community Media CIC	Culture leads development - has been hugely successful in many other centres around the UK All included Nourishing and enriching environment Everyone has access/has a say Affordable housing	Comments noted - however, please see responses above concerning the need to accept the standard methodology set out in the NPPF.	25247	
Conservative Group	We do not believe it to be prudent during these uncertain political and economic times to plan for anything other than growth scenario A. Brexit on the horizon could bring many changes to housing needs especially due to immigration factors, so we believe a more cautious approach is needed now with the potential to look at this again when the future looks more stable.	Comments noted. The standard method, set out in the NPPF, now identifies housing need. The Council does not propose to raise the figure, as significant infrastructure would be needed to deliver it.	25282	

	NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)	NHS England note the requirement for Ipswich Borough Council to deliver a plan for increased levels of housing growth for their area, resulting in approximately 11,420 new dwellings during the plan period 2014 - 2036, and for Suffolk Coastal to deliver 10,111 dwellings during this same period. This represents an additional 3,131 dwellings in Ipswich and 1,845 dwellings in Suffolk Coastal to that proposed within the adopted Local Plans, for which, at this time, no location has been identified. It is also noted that this forms part of the wider plan for the Ipswich HMA to deliver a total of 39,302 dwellings during plan period 2014 - 2036. The impact on primary care services and infrastructure arising from this level of growth will be significant.	Concerns noted. The Council welcomes ongoing discussion with NHS England and representatives of the CCG locally to ensure that appropriate funding can be sought from both Government and the developers to ensure the Health Infrastructure for the area does not become a victim of development success.	24901	
Q7: Do you have evidence to suggest that the housing and/or jobs targets should be different from the forecasts or scenarios outlined above – either higher or lower?	Ipswich Community Media	Understanding the jobs and skills market - so that we can adopt new approaches of inspiring youth and generating aspiration, so that they may adopt passions and interests. We have been very successful in the past with using volunteering as a source to develop skills that lead to jobs. Support small organisations to be able to really give worth while time and meaningful INTERESTING opportunities to young people - make them care about the town centre - youth clubs, arts centres and creativity right through the heart of this town.	Comments noted and understood but relevant to other sections of the council and other activities such as apprenticeships.	25464	
	On Behalf of AquGen	It is noted that Ipswich itself has had the lowest increase in jobs compared with the wider Ipswich FEA. The economic targets for the area are also based on significant economic development opportunities that are located outside of the Ipswich urban area. Whilst there is always an opportunity for spin-off investment and job creation, any economic strategy and resultant land requirement needs to be based on realistic targets to avoid an excessive allocation of employment land which could otherwise be used for alternative land use requirements and demand.	The Council has sought its local plan allocations with a similar degree of pragmatism as that suggested in this submission. The employment targets are set in conjunction with partners and will become the subject of examination if challenged further. Existing employment Land has been reviewed.	25099	
	Northern Fringe Protection Group NFFG	Housing Target: Yes. As the Government's White Paper clearly shows, the OAN for Ipswich Borough is too high and should be revised downwards. Jobs Target: Yes. The EEFM forecast is clearly not "trend-based" and it is extremely misleading to imply that it is. It is too high as evidenced by the Experian figure in the Ipswich SHMA report, which should be used for Ipswich Borough. This is still far higher than historic trends. We have a number of concerns with the underlying evidence basis for this section. [Please refer to full comments for more detail].	Despite best endeavours, the Council has faced a continued shortfall in housing delivery since the completion of the 2011 Plan. In order to be found sound the revised Local Plan must now address both the five year land supply issue and the ongoing assessed need for the Borough. The methodology is set out in Government guidance in the National Planning Policy Framework and the Council will take any revisions to the NPPF into account. Comments concerning the EEFM forecast are noted.	24959	
	Save our Country Spaces SOCS	Housing Target: Yes. As the Government's White Paper clearly shows, the OAN for Ipswich Borough is too high and should be revised downwards. Jobs Target: Yes. The EEFM forecast is clearly not "trend-based" and it is extremely misleading to imply that it is. It is too high as evidenced by the Experian figure in the Ipswich SHMA report, which should be used for Ipswich Borough. This is still far higher than historic trends. We have a number of concerns with the underlying evidence basis for this section. [Please refer to full comments for more detail].	Please see comments above.	25068	
	Suffolk Chamber of Commerce	We note the jobs target and query whether it's realistic when viewed in the context of the current total stock of jobs in Ipswich and the potential constraints that exist on the future supply of labour/skills. Given the extent to which the delivery of the Plan is predicated on employment growth it will be essential for the Council and other public partners to work closely and supportively with businesses. Likewise it will be essential for the Council to work collaboratively with Suffolk County Council, FE and HE providers to ensure the local delivery of appropriate education/skills for growth. Although outside the remit there should be associated initiatives to market Ipswich to businesses who can bring the required labour and skills into the town.	The Council would face objections if it did not set challenging targets for employment growth. In the light of the local talent being produced by our colleges and University the Council will try to encourage the delivery of employment land and promote its use in the manner indicated in the submission.	25161	
	Home Builders Federation HBF	Whilst we welcome the collaboration between Ipswich and Suffolk Coastal, the level of housing needs identified through the SHMA is insufficient and should have taken more account of market signals. Canterbury has similar market signals to the Ipswich HMA and the Inspector considered a 20% uplift to be appropriate there. "Planning for the right homes in the right places" now provides a clearer direction as to how market signals should be taken into account. For Ipswich HMA it suggests that insufficient weight has been given to market signals, and the proposed uplifts should be increased where affordability is worst.	The Council will have regard to market signals and utilise the approved methodology which may be in force at the time of publication.	25019	
	Gladman Developments	The scale of new growth required to shape the future of the area will require the consideration of a range of different delivery options, including those across local authority boundaries. It is noted that a new economic strategy is due to be published by the New Anglia Local Enterprise Partnership in October 2017. It is important that the ambitions of the LEP are reflected within the local plans that are prepared in the area and that the implementation of this important strategy is carefully considered through the duty to cooperate and integrated within Local Plans in their final form.	The Council will continue to work with its neighbours to deliver appropriate growth to meet the needs of the HMA.	25385	
	Q8: Would communities be prepared to accept more growth if that growth meant that significant new or enhanced infrastructure could be provided?	On Behalf of The Kesgrave Covenant	Yes, communities may be prepared to accept more growth if that led to infrastructure enhancements, but as per the comment above, there would need to be clarity as to what additional infrastructure could be provided, and what the benefits of that would be to existing residents. At the moment, Scenario C is presented only as a hypothetical scenario, without firm practical examples or clear links between additional infrastructure items and additional homes, and so is less likely to receive support.	Comments noted - please see other responses above.	24860
		Northern Fringe Protection Group NFFG	No. Communities will not accept higher growth targets until such improvements are delivered and are shown to be effective. There are already sizeable new housing developments planned in and around Ipswich. Higher targets should not be set until there is robust evidence that infrastructure can cope with the current planned expansion. E.g. there is major concern on how the road network will cope with the Ipswich Garden Suburb development and the impacts of this need to be monitored and appraised as it is built out before setting higher targets. There are also concerns over sewage and fresh water infrastructure.	The Council will be required to justify its infrastructure needs and the timing of delivery in order to have the Local Plan found sound.	24960
		Save our Country Spaces SOCS	No. Communities will not accept higher growth targets until such improvements are delivered and are shown to be effective. There are already sizeable new housing developments planned in and around Ipswich. Higher targets should not be set until there is robust evidence that infrastructure can cope with the current planned expansion. E.g. there is major concern on how the road network will cope with the Ipswich Garden Suburb development and the impacts of this need to be monitored and appraised as it is built out before setting higher targets. There are also concerns over sewage and fresh water infrastructure.	Please see above	25067
Private individual		Yes, although having only lived in Ipswich for 6 years, the development to the north of the town seems to be limited. Ipswich is very wide in comparison to other towns. This does not help in making the whole town accessible. Go north, put the infrastructure in and build the northern route.	The required provision of infrastructure for the Ipswich Garden Suburb will be set out in the Council's Supplementary Planning Document. Although roads and other infrastructure are required these do not extend to the delivery of a Northern Distributor.	24787	
East Suffolk Travellers Association		Communities are more likely to accept significant new growth if it means that significant new infrastructure will also be provided. In fact, pressure for growth will be inevitable. By planning for growth and identifying the infrastructure that this requires, the local authority is in a stronger position to bid for infrastructure funding from central government. The document accepts that capacity on locally vital lines is already an issue. Further development can and should lead to improvements in infrastructure.	The Council continues to work with its partners to ensure the timely delivery of infrastructure improvements through the Plan period.	24807	
NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)		As stated above the exact nature and scale of mitigation required to meet augmented needs of proposed developments will be calculated at an appropriate time, as and when schemes come forward over the plan period to realise the objectives of the LP. Comments on the growth scenarios and options set out in the LPR are shown below: We would suggest that one of the key priorities of this document should be ensuring sustainable primary care provision for communities both existing and proposed. NHS England and the CCG would welcome further discussions with the Local Authorities with regard to density of development and cumulative growth over the plan period within specific areas, to understand the impact and how this may be mitigated.	Comments noted. Further discussions are scheduled as part of presubmission consultation work.	24903	
Private individual		There is certainly a need for greater economic growth across the Ipswich HMA. Careful intelligent planning of new infrastructures could permit growth that would fulfil social goals and mitigate damage to the environment.	Comments noted	24719	
Private individual		Not necessarily	There was no further commentary supporting this statement. Comment noted	24746	
Private individual		It would depend on the type of infrastructure offered as an incentive to the community. If landowners wish to realise the value of their land for housing development, they need to bear in mind the wishes of the community and what benefits can be provided to that community under the current development model. In other words the land should be made available to developers at a fair and reasonable price that ensures the delivery of planning gain to the community that "suffers" the impact arising out of new development in their area.	Comments noted	24770	
Railfuture East Anglia		Growth pressure will be inevitable whether people are willing for it to happen or not. By planning for growth and identifying the infrastructure it requires places the local authority in a stronger position when it comes to bidding for infrastructure projects from central government.	Comment noted	25009	
Ipswich Limited	Not at all. No one wants new homes, commercial property, power stations, roads or incinerators built near them. This quirk is also evident in those living in new builds, not just property that is well established or those who have lived in the area for generations.	Comments noted	25403		
Conservative Group	Invariably communities are resistant to new development for obvious reasons, but this can be, and must be, mitigated by enhanced infrastructure. Too often we see developments being granted planning permission without the proper infrastructure in place which leads to increased objections from the residents. This is currently happening with several community groups complaining about lack of sufficient roads, drainage and sewers within the Ipswich Garden Suburb development.	The Council will publish an Infrastructure delivery programme and a s123 statement on its infrastructure need in conjunction with its partner organisations.	25283		
Q9: What key pieces of transport infrastructure should be sought? Would it be roads such as an Ipswich northern route, or sustainable transport infrastructure (public transport, park and ride, cycling), or both?	Northern Fringe Protection Group NFFG	All of these need to be provided to meet the current Local Plan targets. It is critical for Ipswich that the Local Plan Review seeks to address the severe congestion in the local road network that regularly occurs even without the closure of the Orwell Bridge. A roadworks permit system for Ipswich Borough is a must-have. A full cross-boundary Transport Assessment for the draft Local Plans is required to determine what additional transport infrastructure is required and where and when. If it cannot be provided then higher targets cannot be set, as it would be unsustainable to do so.	Please see comments above, the Plan will have infrastructure needs that are justified by traffic modelling undertaken by Highways Department officers from Suffolk County Council.	24961	
	Save our Country Spaces SOCS	All of these need to be provided to meet the current Local Plan targets. It is critical for Ipswich that the Local Plan Review seeks to address the severe congestion in the local road network that regularly occurs even without the closure of the Orwell Bridge. A roadworks permit system for Ipswich Borough is a must-have. A full cross-boundary Transport Assessment for the draft Local Plans is required to determine what additional transport infrastructure is required and where and when. If it cannot be provided then higher targets cannot be set, as it would be unsustainable to do so.	Please see comments above.	25066	
	East Suffolk Travellers Association	Improvements are needed to the local rail network. Atkins, consultants to East/West Rail, are putting the case for an increase in train service frequency into Ipswich from Bury St Edmunds and Felstowe. This will require additional platform capacity at Ipswich and double-tracking the Felstowe line. The proposed Ipswich Garden Village should benefit from a relocated Westerfield station served by more trains than at present. East Suffolk Line capacity should be enhanced to enable half-hourly services to Woodbridge and Saxmundham, and provide Woodbridge with a more attractive service into Ipswich. Ideally, the entire section from Woodbridge to Saxmundham should be re-doubled.	The Council is a member of the East-West Rail Consortium and supports the East-West Rail project. The Council also supports enhancements of other rail services to/from Ipswich. The idea of relocating Westerfield station has been considered previously but the substantial cost of doing this makes it difficult to justify and find appropriate funding.	24808	
	Private individual	Both	Noted	24653	

	NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)	We would support a policy to ensure sustainable transport infrastructure linking new and existing communities.	Support for sustainable transport initiatives welcomed	24904
	Private individual	Both types of transport infrastructure should be sought: sustainable transport structures in the short term; the northern route as soon as possible.	Noted	24739
	Private individual	Yes to Northern Bypass. Needed because the Orwell Bridge is just not up to the job with no sensible diversion routes. But avoiding problem currently with A14 which effectively makes Ipswich a walled town from the south. Access to waterfront needs something exciting. An inner circular trolley bus connecting station, shops and waterfront might be not that expensive an option.	Noted	24747
	Railfuture East Anglia	Improvements to the local rail network. Atkins consultants for 'East-West Rail' are advancing the case for increases in the frequency of rail services into Ipswich from Bury St. Edmunds and Felixstowe but this will require additional platform capacity at Ipswich and double tracking the Felixstowe line. Ipswich Garden Suburb should benefit from a relocated station at Westerfield to provide sustainable transport links to the rest of the network. The East Suffolk line should be double track as far as Saxmundham (currently only as far as Woodbridge). This would enable the services to run every half hour to Woodbridge and Saxmundham and provide Woodbridge with a more attractive service into Ipswich.	The Council is a member of the East-West Rail Consortium and supports the East-West Rail project. The Council also supports enhancements of other rail services to/from Ipswich. The idea of relocating Westerfield station has been considered previously but the substantial cost of doing this makes it difficult to justify and find appropriate funding.	25010
	Ipswich Limited	There should be an in-line platform rail station in South East Ipswich where traffic is a major concern especially around rush hour. (An additional rail spur (north) to near Adastral Park would also be sensible. It won't be cheap but if we don't endeavour for it the money will go elsewhere. A full dual carriageway Northern Bypass goes without saying, however, a "northern route" or "relief road" is inadequate. There must be the understanding that Felixstowe HGV traffic should not be going through the Ipswich road network at all, especially near to residential areas, hence the Upper Orwell Crossings isn't suitable.	Comments noted	25404
	Conservative Group	The Conservative group are in favour of a Northern Route for Ipswich as well as significant upgrades to the Copdock interchange. Whilst we maintain a focus on sustainable public transport more must be done for the car driver who has been virtually ignored over the past few years. It cannot be ignored that despite environmental concerns car driving is more popular than it ever has been and journeys, especially those under 3 miles are increasing - these matters must be addressed rather than ignored.	Comments noted. It is intended that the Ipswich Parking Strategy will address parking demand issues in the town centre and the Council is currently working on this in conjunction with SCC. SCC are the Highway Authority and take primary responsibility for strategic transport planning.	25284
Q10: Should the Local Plan Review seek to address the issue of temporary closure of the Orwell Bridge by planning for a scale of development that can help to deliver infrastructure?	Northern Fringe Protection Group NFIG	Yes, but this question misses the point of addressing the current levels of congestion, which will only increase under the current Local Plan proposals. It is critical for Ipswich that the Local Plan Review addresses the current severe congestion in the local road network, especially through Ipswich, that regularly occurs even without the closure of the Orwell Bridge. A roadworks permit system for Ipswich Borough will help ease congestion.	The Council continues to work with its partners to ensure the timely delivery of infrastructure improvements through the Plan period. This will include road improvements agreed with the Highway Authority to offset and mitigate the effects of development. The Council has also introduced an air quality management policy to ensure that pollution does not exceed the expected standards. The Suffolk County Council is currently considering the introduction of a roadworks permit system.	24962
	Save our Country Spaces SOCS	Yes, but this question misses the point of addressing the current levels of congestion, which will only increase under the current Local Plan proposals. It is critical for Ipswich that the Local Plan Review addresses the current severe congestion in the local road network, especially through Ipswich, that regularly occurs even without the closure of the Orwell Bridge. A roadworks permit system for Ipswich Borough will help ease congestion.	Please see comments above	25065
	Private individual	No, the closures of the Orwell Bridge is a bit of a red herring as this only happens on the odd occasion. Instead Suffolk C.C. should ensure that buses actually go where people want. For example buses in east Ipswich are all filtered up to Tower Ramparts rather than a split between there and the train station - encouraging people to use their cars and increasing traffic and pollutants.	Comments noted. Whilst some bus services are linked to the railway station it is acknowledged that many are not. However, most bus services in Ipswich are operated on a commercial basis meaning that the bus operators themselves, rather than local authorities, determine the routing.	24654
	Private individual	In some respects the answer is yes; if the local plan can bring about a mechanism and indeed help resolve the ongoing problems caused to Ipswich residents and road users by the closure of the Orwell Bridge, then by all means it should do so. The local plan could aid the unlocking of the island site for redevelopment and generate cash for the delivery of the proposed Upper Orwell Crossing, plus contributions from the landowner, ABP Ports, which would clearly benefit from such redevelopment.	Comments noted.	24771
	Ipswich Limited	No. The Orwell Bridge is a bottleneck. Assuming no problems with nearby trunk roads the Ipswich road network is largely inadequate for the number of vehicles using it.	Comment noted.	25405
	Conservative Group	IBC should explore every possible avenue in partnership with other agencies to address the issues caused by closures of the Orwell Bridge.	Comment noted.	25285
Q11: Do you agree that providing a high growth scenario would help to deliver the affordable housing required?	Mersea Homes	It is our view that a higher growth scenario would support achieving improved affordability both through the direct supply of homes to the market, but also by increasing the proportion of affordable housing being delivered.	Affordable Housing delivery will continue to be an important priority for the Council. Achieving a high proportion of new affordable homes will depend on the viability of schemes and the developers willingness to address this important element of the Plan.	25482
	On Behalf of The Kesgrave Covenant	Yes, in the absence of any alternative delivery model, the level of affordable housing delivery is substantially linked to the quantum of housing growth. Since the OAN in isolation is unlikely to deliver sufficient affordable housing, there is definitely merit in an affordable housing 'uplift' to the OAN figure to increase affordable delivery. However, affordable housing delivery is not only a factor of the overall quantum of new homes, but the type of sites allocated for new housing - subject to other infrastructure requirements, new strategic allocations are better placed to deliver a higher proportion of affordable housing than existing small-scale urban opportunities, as evidenced by the higher proportion of affordable housing being sought at the Ipswich Garden Suburb. The Council may wish to consider adopting a two tier approach to affordable housing, with a lower delivery rate on smaller sites, and a higher rate on strategic sites.	The Council, in cooperation with its partners, will seek an appropriate distribution of new homes within the Housing Market Area. To assess the need the Council has revisited the emerging guidance on delivery contained in the Draft National Planning Policy Framework. The duty to cooperate will mean that agreement should be achieved concerning the number of homes to be delivered by the Councils within the Strategic Housing Market Area.	24859
	Suffolk County Council SCC	Both councils are right to highlight the potential for more homes being planned to provide a greater number of affordable homes and that these would be likely to serve the needs of Ipswich. However, the cost of the necessary infrastructure will need to be integrated further if such an approach were to be followed.	Comments noted.	25459
	Northern Fringe Protection Group NFIG	No. Ipswich Borough cannot meet its current OAN target. Any increase in homes targets would clearly not deliver any more affordable housing in the Borough due to land constraints. We support IBC building affordable housing on its own land but as it already plans to do this, increasing the homes target will have no effect on numbers delivered. Affordable housing will only be provided in Ipswich Borough by commercial developers if it is viable to do so. Increasing the Ipswich OAN will not result in increased affordable housing outside the Borough as IBC would have little say in planning applications.	Concern noted. Please see comments above.	24963
	Save our Country Spaces SOCS	No. Ipswich Borough cannot meet its current OAN target. Any increase in homes targets would clearly not deliver any more affordable housing in the Borough due to land constraints. We support IBC building affordable housing on its own land but as it already plans to do this, increasing the homes target will have no effect on numbers delivered. Affordable housing will only be provided in Ipswich Borough by commercial developers if it is viable to do so. Increasing the Ipswich OAN will not result in increased affordable housing outside the Borough as IBC would have little say in planning applications.	Please see comments above.	25064
	Private individual	It's unlikely a high growth scenario will alone deliver affordable housing. It is, arguably, quite apparent that the private sector development model as used by the volume house builders is simply unable to bring about delivery of affordable housing. Greater emphasis should be given to local authorities to plan and deliver affordable housing needs.	This perspective is noted, however, Local Plan policy will still promote the inclusion of an element of affordable housing (AH) in the mix of tenures. This should not be to the detriment of a scheme's viability provided that it is properly anticipated and land values are set with the responsibility to deliver AH in mind.	24772
	Gladman Developments	The Local Plan should seek to ensure that the objectively assessed needs for market and affordable housing are met in full. Where necessary, the Council will need to ensure that its evidence base is up to date to ensure that this can be achieved. This will also include the need to test a range of policy options through the sustainability appraisal process to determine the most appropriate strategy to pursue with regards to housing mix, affordability, affordable housing and the density of development.	Noted - please see comment above.	25389
	Ashfield Land Limited	As set out above, the PPG supports an increase in the total housing provision included in a local plan where it could help deliver the required number of affordable homes. By adopting a more ambitious growth scenario, such as Scenario C, there is more chance that the Local Plan Review will deliver the required level of affordable housing over the plan period.	The Council welcomes the prospect of affordable homes being delivered but recognises that the amount of housing in the plan area will be determined in conjunction with the partner authorities.	25039
	On Behalf of Bloor Homes	It is agreed that a high growth scenario would help to deliver the required levels of affordable housing, as the primary mechanism for the delivery of affordable housing is highly likely to be through mixed tenure developments incorporating market housing. In order to ensure that affordable housing is directed to areas of greatest need, additional growth should be focussed in areas in proximity to Ipswich, including areas which may not be within the administrative area of the Borough but which still have a strong functional relationship with Ipswich.	The Council will continue to work in conjunction with its adjoining councils through the Ipswich Strategic Planning Area board to agree delivery of any future development in and around the boundaries of the borough.	25222
	Pigeon Investment Management Ltd	Allocating and delivering more housing sites will lead to higher levels of affordable housing provision as affordable housing is provided as a percentage of any development. Many larger brownfield sites that are existing employment sites will have high remediation costs that will reduce the amount of affordable housing that is deliverable.	The Council will maintain its effort to obtain grant aid funding to enhance the opportunity for providing AH on difficult redevelopment sites during the plan period.	25361
Q12: Are there alternative scenarios which should be considered?	On Behalf of The Kesgrave Covenant	Following on from our answers above, a variant to Scenario B (which adjusts the OAN to reflect job growth), would be a scenario that adjusts the OAN to more fully meet the need for affordable housing delivery. Rather than Scenario C, which provides a generic and rather hypothetical infrastructure growth scenario, it would be helpful to provide some variants to Scenario C setting out specific infrastructure/growth packages e.g. a Northern By-Pass Growth Scenario showing what level of housing growth might be necessary to deliver this item of infrastructure, and what other social and physical infrastructure may need to be provided alongside that growth to meet the requirements of the new homes that this would entail. We feel this would give more substantive information to enable more informed views on the implications and opportunities that the higher growth scenarios could present.	Please see comments above.	24861
	Northern Fringe Protection Group NFIG	Yes. A more realistic growth scenario based on the Government's White paper target and the Experian jobs target, although we note even this is double the historic trend. A scenario that takes account of BREXIT, including weaker sterling levels, should be assessed. We note that paragraph 5.38 of the SHMA states that a 10 year scenario was ruled out because of the low levels of international migration following the recession. However, this type of scenario is far more likely given BREXIT and the much weaker pound, which have slashed the attractiveness of the UK to EU workers.	Comment noted. The Council continues to plan for its growth in housing based on OAN to accord the Government's guidance.	24964

	Save our Country Spaces SOCS	Yes, a scenario that takes account of BREXIT, including weaker sterling levels, should be assessed. We note that paragraph 5.38 of the SHMA states that a 10 year scenario was ruled out because of the low levels of international migration following the recession. However, this type of scenario is far more likely given BREXIT and the much weaker pound, which have slashed the attractiveness of the UK to EU workers. Growth should go where it is sustainable. The Local Plan growth agenda is unsustainable. A clear and unequivocal determination of wider infrastructure needs, and funding to meet them, is needed.	See Above	25063
	Private individual	Do we need to infill every spare bit of land with housing? No. There are so many empty buildings and half built things in Ipswich and these should be looked at first.	The Council is keen to ensure that brownfield sites and those sites which faltered as a result of difficult market conditions are brought forward during the plan period.	25506
Where should Growth go?	Mersea Homes	We consider it is imperative that Ipswich continues to focus on delivery of its current housing allocations, these are a finite resource, and the Council has no option but to look beyond its boundaries. The stalled delivery rates experienced over the last seven years demonstrate that relying predominantly upon town centre regeneration sites creates vulnerability to economic cycles and prevents a balanced housing supply. Instead, we support Option 2 whereby the emphasis is placed upon securing housing development within adjoining authorities. Allied to that, we support Option 5 which focuses growth around Ipswich and along the A14 corridor.	See comments above.	25483
	On Behalf of The Kesgrave Covenant	It is evident that Option 1 (intensification of urban development by raising densities) has already reached its practical maximum under the existing Local Plan. In respect of Options 2 and 3 (development beyond the Borough boundary), the evidence in respect of housing need compared to housing land availability, as tested through the recent Local Plan Examination, shows that this part of the strategy is not so much an option as a necessity, as it is inevitable that part of Ipswich's housing need will need to be met in adjoining areas. In respect of this part of the strategy, the relevant questions are not whether this is appropriate, but: (a) How much of Ipswich's housing need should be met outside of it's boundary; and (b) Where that need should be accommodated. In respect of both questions posed above, the starting point must be to seek to meet as much of Ipswich's housing need either within or adjacent to the town as practically possible.	Comments noted	24862
	Northern Fringe Protection Group NFFG	In general, we believe the current approaches, contained within the existing Local Plans are most appropriate. Basing the Local Plans on the Government's White Paper Housing targets would allow these approaches to continue.	Comment Noted	24965
	Suffolk Preservation Society	SPS considers that development should be concentrated within the town (Option 5) and an increase in density would be preferable to erosion of countryside edge locations or encroaching into adjoining districts. Failure to concentrate in large urban areas will mean more greenfield sites need to be released which will reduce the viability of regeneration of urban brownfield sites.	The aim to redevelop town centre sites remains a continuing priority for the Council. However, the tightly drawn boundaries for the town suggest that during the current plan period to 2036 some planned growth will be inevitable if the Council is to achieve the delivery of sufficient homes to meet the objectively assessed need and the government's expectation for new homes. In this context the Council believes that it must develop ideas with its partner councils under the duty to cooperate to achieve the best development possible around the edge of the town while maintaining commitment to the historic core of the town.	24698
	Tuddenham St Martin Parish Council	The Parish Council considers Option 4 'Continuation of existing approach' the best solution.	Comment noted	24923
	Historic England HE	From a historic environment perspective, it is hard to select the preferred option given the range and distribution of heritage assets throughout both the Borough and the district. Each option will have an impact on heritage assets, and it will depend to some extent on where site allocations are identified. We note in particular that in some options Saxmundham and Framlingham have been identified for significant growth. Owing to the concentration of heritage assets and topography, both settlements are sensitive to new development and significant levels of growth are likely to have notable impact on the historic environment.	Further comments awaited at preferred options stage when more detail becomes available.	24897
	East Suffolk Travellers Association	A blend of options 4 and 5. The key to maximising sustainable travel will be to focus development in and around towns with good access to the rail network. Three obvious examples are Woodbridge, Felixstowe and Saxmundham. Leiston also has potential access to the rail network if the branch is again served by passenger trains. Framlingham is 6 miles from the nearest railhead by a secondary road and is thus less of a candidate for growth. Estate agents' websites show that "distance to nearest rail station" has overtaken "school catchment" as the most important consideration when choosing where to live.	Support for a hybrid of Options 4 and 5 for development at or near sustainable transport nodes noted.	24810
	Private individual	I consider Option 4 is most suitable as it builds on existing attractive sustainable localities. Option 5 may also be feasible but will lead to Ipswich expanding into a large and possible unattractive large town. Option 6 is most undesirable - we have seen elsewhere what linear development leads to - I am surprised it has even been suggested. General comment - Why isn't Wickham Market included?	Support for option 4 noted	24679
	NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group, (CCG)	Growth Scenarios described will all have a significant impact on the delivery of primary care services. The mitigation required from each of the scenarios will reflect the level of impact and the final identified locations for development growth. It is however important to remember that improved or newly created infrastructure, alone will not fully mitigate the impact of development growth. Resource and revenue implications provide a very significant risk to the delivery of primary care services and we should continue to work together to identify ways in which sustainable health care services can be delivered and how development can contribute to healthy communities and the training and recruitment of health care professionals. See attachment for detailed comments on the various options.	The health commentary is welcomed and detailed comments helpful. NHSE and CCG representatives will be contacted further to ensure that the health objectives are considered properly in the production of the Infrastructure delivery programme that will attend later iterations of the Local Plan.	24910
	private individual	Can I suggest that all three options for IBC stay on the table for further research and more specific consultation? I'd like to see the brown sites near the Waterfront developed (Option 1), but housing densities near the town centre should be kept low because there are not the transport facilities and infrastructures to cope with big increases in the population. Option 2 provides some opportunities, but my preferred option would be Option 3, as it would alleviate pressures on the town centre.	Comments and preference for option 3 noted	24720
On behalf of FIS Property and Landex Limited	We have considered the alternative growth delivery options in Part 1 (pages 24-26). We consider that a combination of Option 1 (higher density urban regeneration) and Option 3 (Changing use of existing land in the borough to housing) provide the most appropriate housing growth delivery options. This will ensure that housing is provided in sustainable locations, regenerating areas that are in need of change and where development can enhance both the urban and living environment and make more efficient use of urban land.	The Council remains supportive of brownfield redevelopment and the wish to see increased densities in the core of the plan area and will continue to work with other agencies to achieve these objectives in support of the growth agenda.	24869	
West Suffolk	The Plan is sound. Options 4 and 5 place a high proportion of growth within the area East of Ipswich. It will be important to ensure that the highway requirements of cumulative developments (particularly those using the A14) are adequately addressed, to enable appropriate growth. West Suffolk supports initiatives that improve cross-County road and rail infrastructure.	West Suffolk comments noted	24763	
Private individual	Option 5.	Support for Option 5 Noted	24774	
Railfuture East Anglia	Of the options presented the best seems to be a blend of options 4&5. Key to maximising sustainable travel will be to focus development in and around towns with good access to the rail network. Woodbridge, Felixstowe and Saxmundham are on the rail network whereas (for example) Framlingham is not. A study of estate agents web sites reveals that 'distance to nearest rail station' has overtaken school catchment as being the most important consideration when choosing where to live.	Support for a hybrid of Options 4 and 5 for development at or near sustainable transport nodes noted.	25013	
Gladman Developments	Gladman does not specifically favour any of the options that have been identified, but would highlight the need to plan for significant growth in proximity to Ipswich in addition to making realistic assumptions regarding the delivery of new homes across Ipswich's important urban regeneration sites.	Comments noted	25111	
Ashfield Land Limited	A combination of the distribution options suggested will be required. There must, however, be recognition that increased development beyond the Ipswich Borough boundary will play a key part in this delivery. We would advocate a particular focus on providing for additional growth in those areas located around the Ipswich fringe, including those in MidSuffolk, given the direct relationship between such areas. It's recognised that other options for the distribution of growth will also need to be included in the Local Plan Review. This could include an element of higher-density urban regeneration and the reuse of appropriate employment land.	Comments Noted and additional support for a hybrid of several of the options.	25040	
On Behalf of Bloor Homes	In respect of Option 1, we would question whether a higher density urban-regeneration approach could deliver development needs in full. In addition, it is not clear if higher density urban regeneration is viable. We would caution against relying on Option 2. The creation of a new settlement would require provision of entirely new infrastructure, and the cooperation and effective working of multiple agencies. Inevitably, there will be long lead in times for the commencement and completion of development. The use of edge of settlement countryside represents a potentially sustainable Option 3. Such areas have the potential to be well-related to existing services, facilities, transport infrastructure and employment opportunities. Option 4 directing growth east of Ipswich represents a sustainable approach. Option 5 will reinforce the links across the administrative boundaries of Ipswich and Suffolk Coastal as well as supporting the County Town of Suffolk through increased focus of future growth. We question the sustainability of option 6.	Concern that high density urban regeneration projects will deliver the housing need of the plan period is noted. Further support for a hybrid option.	25223	
Pigeon Investment Management Ltd	If the conclusion of the recent Local Plan examination was that housing needs to 2031 could not be met within the Borough, then housing needs to 2036 cannot be met within the Borough. The Duty to Co-operate is clear in national planning policy and legal precedent, and in the conclusions of the examination and local planning policies CS6 and CS7. The only sound option for housing growth is therefore to look to neighbouring Districts to meet the Objectively Assessed Need.	Comment noted	25362	
Conservative Group	Option 2 is the preferred choice of the group. We must face facts that our Borough boundaries constrain our development in many ways. Ipswich contributes greatly to the surrounding areas and provides many of the main services for the region. What it cannot provide, due to space, is housing so it makes sense that the other areas take a higher proportion of the new developments.	Comment noted	25296	
Q14: Are there any other distribution options that the Councils should consider, including across the whole of the Ipswich Housing Market Area?	On Behalf of The Kesgrave Covenant	No, unless there are compelling reasons why the growth for Ipswich and Suffolk Coastal cannot be met within those areas, it is not appropriate to distribute that growth more widely across the Housing Market Area - see previous answer to Question 13, and the fundamental principle that OAN should be met within or as close as possible to the area in which it arises.	Comment noted. However, the duty to cooperate provides for Council's to help each other in delivering the expected quantity of new homes now set by a standard method. This will involve IBC in working with each of its neighbouring authorities - through a strategic panel of elected members- to agree the best means of distributing the new homes needed. The arrangements cannot be achieved in agreement with Suffolk Coastal District Council in isolation from the other Council's that share in the Strategic Housing Market area.	24864
Suffolk County Council SCC	The closure of Rock Barracks around 2027 may have an impact on the spatial choices within Suffolk Coastal.	Comment Noted. The Councils will need to consider options that arise in the future as part of future delivery programmes and review processes.	25458	
Northern Fringe Protection Group NFFG	The distribution options need to be reassessed to take account of the Government's White Paper targets.	The government's guidance will need to be properly considered for the Local Plan review to be found sound.	24966	

	Private individual	Wickham Market should be considered, and any other locations having good rail access.	The promotion of Wickham Market as a location for development is a matter for the Suffolk Coastal District Council Local Plan. In terms of the response to the IBC the principle of dispersing new homes to sustainable locations with good transport links is noted.	24680
	Home Builders Federation HBF	Consider a combination of the options. Whilst some higher density development and changes of use must be considered, there will be a need for some of Ipswich's needs to be accommodated elsewhere. IBC should be clear how many homes will be provided elsewhere and ensure that the other authorities allocate sufficient sites to meet those unmet needs. SDCD options will need to take account of the need to meet some of Ipswich's unmet needs. Some could be near to Ipswich but the Council should also consider increasing housing delivery at other towns and villages. SDCD could consider an approach that draws on aspects of each option that will support the necessary growth to meet the needs of the area. The plan must be clear how needs are being met and that there are shared policies, contingency measures and monitoring to facilitate this joint working.	The HBF submission reflects the revised guidance set out in the NPPF of July 2018. IBC will be in close discussion with its partner authorities, under the duty cooperate.	25032
	Gladman Developments	The opportunity exists for the delivery of a further sustainable extensions to the urban area of Ipswich at Bucklesham Heath Garden Village to support the delivery of the vision for the HMA and FEA (Please see the Bucklesham Heath Garden Village Vision Document). By supporting significant levels of further growth in the form of a new garden village to the East of Ipswich, the Plan can take a proactive step towards delivering the new homes, infrastructure and facilities that the urban areas needs to create a positive impact on the local, regional and national economy.	The Council will have regards to key sites promoted in the fringe and put forward proposals to meet the identified need at the next stage of the Plan process. The aim will be to deliver the Councils housing need within the borough Boundary, and through strategic working with neighbouring local planning authorities.	25386
Q15: Should the spatial distribution of jobs growth align with housing growth or should we take a different approach which focuses on improving accessibility between homes and work places?	Northern Fringe Protection Group NFFG	Regardless of the approach taken, improving accessibility between homes and work places must be a priority when developing the Local Plans and assessing infrastructure requirements. A full cross-boundary Transport Assessment of the impact of draft Local Plans is required before they can be finalised.	IBC is cooperating with others in the production of a Transport Assessment.	24967
	Save our Country Spaces SOCS	Regardless of the approach taken, improving accessibility between homes and work places must be a priority when developing the Local Plans and assessing infrastructure requirements. A full cross-boundary Transport Assessment of the impact of draft Local Plans is required before they can be finalised.	IBC is cooperating with others in the production of a Transport Assessment.	25062
	Suffolk Preservation Society	To be truly sustainable SPS believes that jobs and homes should be proximate to minimise car journeys and safeguard the environment.	Support for the continuation of the homes near to jobs approach noted.	24699
	Private individual	The question presumes individuals in future are employed and working at workplaces. The number of self-employed has rocketed and growth in start-ups is huge. How about a growth area where there is housing and enterprise space e.g. small/medium sized and shared office/workshop space. To minimise commutes, put space in clusters, not massive industrial estates, but e.g. on Ravenswood an enterprise small business space where they can base themselves rather than driving into the town centre - facilities like Basepoint built closer to people's homes. There is nowhere in Ipswich I could relocate my business to (currently in Bury St Edmunds).	The Council will continue to work for a range of sites offering different types and sizes of commercial and business property.	24790
	Private individual	A mixed approach is needed, but strategically the aim should be to limit the need for travel to work, and certainly not extended travel (e.g. to London). The effect of London economic growth on the South East has been to encourage more travel to London, leading to overcrowded trains, overpriced houses and worn out commuters. It's a failed strategy.	Please see comment above	24681
	Private individual	Spatial distributions of jobs should align with housing development.	As above	24776
Q16: Do you have evidence which indicates that building at higher densities in Ipswich and Suffolk Coastal would be viable financially?	On Behalf of The Kesgrave Covenant	No. The residential market is still primarily focussed on family housing, albeit moving away from the largest properties, and there is no evidence of a return to high rise/high density schemes.	Comments noted.	24865
	Suffolk County Council SCC	Options for increasing densities within Ipswich should be thoroughly explored before further growth is considered on greenfield sites, particularly beyond the administrative boundary. This could include the potential relocation of businesses, which may prefer improved access to the primary route network. However, it should be recognised that more urban locations for businesses, particularly those towards the centre of the town, can offer better opportunities to use sustainable transport for journeys to work.	IBC welcomes the opportunity to consider initiatives for the relocation of existing business premises to sites that offer improved access to the primary route network, provided that the receptor site is appropriate for the purpose suggested.	25460
	Northern Fringe Protection Group NFFG	We support the current Local Plan densities, which have recently been found by the Planning Inspector to be sound. Clearly Ipswich Borough will have set these as they believed them to be most appropriate. The current building density requirements should be regarded as a maximum to prevent undesirable high density developments. Lowering the current density levels will only result in lower quality developments with less open space of which there is already a deficit in most areas.	Support of the current Local Plan densities noted. National Planning Policy Framework (2018) paragraph 123(a) requires minimum density standards to be set in plans and therefore setting a maximum density standard would be contrary to national policy.	24968
	Historic England HE	We would note the difference between high density and high rise. Ipswich in particular has had a number of high rise buildings to deliver high density. Historic development patterns also provide high density housing at a low rise level. High density and high rise should not become synonymous. Historic England is commissioning research to better understand how increasing housing density in heritage-rich areas can be achieved in ways sensitive to the historic environment. This will be coming forward during the local plan process and should be considered as part of the evidence base to the local plan.	Comments noted regarding difference between high rise and high density. IBC welcomes the opportunity to review and consider the findings of the Historic England research into housing density in heritage rich areas.	24900
	Pigeon Investment Management Ltd	The slowdown in development of high density development in Ipswich shows that the viability of high density development in the Borough of Ipswich is an issue.	Comments noted regarding slowdown of development rate of high-density in the Borough.	25363
	Conservative Group	We are against any high-density developments.	Comments noted. See comments above regarding need to set minimum density standards and national policy.	25287
Q17: Should the policy approach of maintaining the physical separation of villages from Ipswich be continued or should infill in gaps between settlements be considered a source of housing land?	Merssea Homes	Whilst we recognise that existing villages will wish to preserve their character and independence, close to Ipswich - particularly where distances to the town centre are modest - there is an advantage in using land efficiently. This means recognising the setting and character of villages without establishing disproportionate cordon sanitaire.	The Council is committed to ensuring that land is used efficiently and therefore suitable locations will be considered on a site by site basis, informed by landscape evidence.	25484
	On Behalf of The Kesgrave Covenant	We would suggest that the issue of settlement separation is one that needs to be dealt with on a settlement by settlement basis. Historically, expansion of Ipswich has, at times, involved the successful amalgamation of previously free-standing settlements into the urban area, and there may be instances of small settlements that currently display little in the way of separate identity, and where the long-term growth of the town suggests that amalgamation is the most appropriate option. Equally, there will be many settlements where it is quite appropriate to maintain a degree of separation and protection to ensure that their separate identity is preserved. The appropriate approach is to consider on a case by case basis (a) which settlements should be protected, and (b) what land is necessary to keep open to ensure that separation, having regard to factors such as local topography, vegetation, settlement form etc.	Comments noted. Locations will be considered on a site by site basis, informed by landscape evidence.	24867
	Suffolk Wildlife Trust	Any decision to look at infilling of gaps between settlements must consider any likely impacts on the green infrastructure network of the area. Gaps between settlements are likely to contribute to this network, providing connectivity between greenspaces within the town and those on the urban fringe. These connections must be protected, reinforced and enhanced through the Local Plan.	All key green spaces are to be secured by virtue of the Plan Policy CS4 and national NPPF policies that safeguard important ecological assets. Furthermore, the Council seeks to establish and extend green connections within the Borough through policy DM33. Decisions on infilling gaps between settlements will be taken on a case by case basis, informed by landscape evidence.	25007
	Northern Fringe Protection Group NFFG	The policy approach of maintaining the physical separation of villages from Ipswich should be continued.	Comment noted. Suitable locations will be considered on a site by site basis, informed by Landscape evidence.	24969
	Save our Country Spaces SOCS	The policy approach of maintaining the physical separation of villages from Ipswich should be continued.	Comment noted. Suitable locations will be considered on a site by site basis, informed by Landscape evidence.	25061
	Greenways Countryside Project	We support the continued separation from neighbouring villages. This helps to define the very important 'green rim' of open space around the town.	The Council intends to maintain and extend the publicly accessible green rim around the edge of the Borough to facilitate access to natural and semi natural greenspace.	25342
	Suffolk Preservation Society	SPS would always seek to protect distinctive settlements and sensitive landscapes while recognising that in some instances sustainable locations should be brought forward in preference to encroaching into countryside.	Comment noted. Suitable locations will be considered on a site by site basis, informed by Landscape evidence.	24700
	Tudtenham St Martin Parish Council	The policy approach should continue to maintain the physical separation of villages from Ipswich. The source of housing land in infill gaps between settlements should not be considered and preference should be given to developing brownfield sites within Ipswich before developing areas outside the borough.	Comments noted. The Council supports maximising the use of previously developed land within Ipswich and will consider locations for development on a site by site basis.	24924
	Historic England HE	It is important that the historic pattern of settlement in Ipswich and Suffolk Coastal is maintained through a physical separation of settlements, in particular preventing coalescence between Ipswich and the surrounding villages. The issue of coalescence does not just affect larger towns and cities but we have seen proposals in the region proposing coalescence between market towns and villages. Acceptance of such a principal undermines the setting and purpose of each individual settlement and places pressure on numerous heritage assets which lie in the countryside.	The value of gaps between settlements is recognised as helping to create a sense of place and identity. Locations will be considered on a site by site basis to ensure the most sensitive location are protected from development.	24902
	On behalf of RSPB	Any actions taken on this matter needs to pay full consideration to the Green Infrastructure network and assess how any decisions may impact upon it.	All key green infrastructure is to be secured by virtue of the Plan Policy CS4 and national NPPF policies that safeguard important ecological assets. The Council intends to maintain and extend the publicly accessible green infrastructure network around the edge of the Borough.	24645
	Private individual	No. Any area within the A14/A12 should be open for development. Kesgrave etc is part of Ipswich and the residents should deal with it.	The Council will consider locations on a site by site basis. The strategy is to look at brownfield sites and sites within the Borough boundary	24655
	Private individual	I would support expanding sustainable settlements but not merging minor villages by infilling unless they can be made sustainable in their own right.	Comment noted. Locations will be considered on a site by site basis to ensure the most sensitive location are protected.	24682
	Ipswich Wildlife Group IWG	The continued separation from neighbouring villages is highly valued and should continue, maintaining the valuable green rim open space around the town.	Comment noted. Locations will be considered on a site by site basis to ensure the most sensitive location are protected.	24821
	Suffolk Constabulary	Yes. Without those spaces everyone's quality of life would be affected. Children and young people would have no-where to play and the recreational and mental health benefits of the open spaces would be lost. Less allocated open space could lead to further conflicts when a higher volume of people try to co-exist without that 'breathing space'.	Comment noted. The Council is committed to establishing and enhancing green spaces within the borough, which contribute towards health and wellbeing of communities.	24844
	Private individual	Physical separation of villages should be maintained.	Comment noted. Locations will be considered on a site by site basis.	24775
	On Behalf of Bloor Homes	Whilst the merit of protecting the identity and distinctiveness of settlements and communities is acknowledged, the Local Plan should avoid applying an arbitrary and overly simplistic approach through which development on the edge of Ipswich within Suffolk Coastal District is seen as harmful to such objectives. Such an approach could severely weaken opportunities to promote sustainable patterns of growth, potentially forcing development away from the most accessible locations and further into the open countryside. Instead, such policies should be specifically focussed on protecting landscape of particular value.	Comment noted. Locations will be considered on a site by site basis to ensure the most suitable and sustainable sites are brought forward for development. Decisions will be informed by landscape evidence.	25224
	Conservative Group	Infill gaps between settlements should be considered for developments where appropriate e.g. Ipswich & Claydon. We believe that villages should retain their identities but there are several areas around Ipswich where there is virtually no separation gap, so this must be considered on a case by case basis.	Comments noted. Locations will be considered on a site by site basis to ensure places maintain their unique identities.	25288

Q18: If development cannot be accommodated within Ipswich, should it be focused within the communities close to Ipswich or distributed within the larger Ipswich Housing Market Area? What criteria should guide its location?	Mersea Homes	We support the need to look beyond the Ipswich administrative area to meet Ipswich's housing need. We therefore support distribution options 2 and 5 in combination. We also support focussing on communities close to Ipswich, particularly where those communities are well connected to the town centre, either in distance or transport terms. The ICS, whilst in parts abutting the Ipswich administrative boundary, remains relatively close to the town centre and will be well served by public transport. It would be logical to look beyond this boundary to continue to meet Ipswich's need.	The Council will have regard to peripheral sites through the SHELAA and their suitability, availability and achievability including those to the east of Ipswich.	25485
	On Behalf of The Kesgrave Covenant	See answers to Questions 13 and 14 - OAN should be accommodated either within, or as close as possible to within, the area in which it arises, as OAN relates to locally arising need.	Comments noted	24868
	Northern Fringe Protection Group NFIG	As these authorities appear to be concentrating new developments on the boundaries of Ipswich, placing pressure on Ipswich's infrastructure we believe it is reasonable for some increased development beyond the Ipswich Borough boundary.	Comments noted	24970
	Save our Country Spaces SOCS	As these authorities appear to be concentrating new developments on the boundaries of Ipswich, placing pressure on Ipswich's infrastructure we believe it is reasonable for some increased development beyond the Ipswich Borough boundary.	Comments noted	25060
	Suffolk Preservation Society	SPS would always seek to protect distinctive settlements and sensitive landscapes while recognising that in some instances sustainable locations should be brought forward in preference to encroaching into countryside.	The Council has produced a landscape sensitivity study which highlights the important of distinctive and sensitive settlements and this will be considered through plan-making and decision-making	24701
	East Suffolk Travellers Association	The key to maximising sustainable travel will be to focus development in and around towns with good access to the rail network. Three obvious examples are Woodbridge, Felixstowe and Saxmundham. Leiston also has potential access to the rail network if the branch is again served by passenger trains. Framlingham is 6 miles from the nearest railway by a secondary road and is thus less of a candidate for growth. A study of estate agents' websites has revealed that "distance to nearest rail station" has overtaken "school catchment" as the most important consideration when choosing where to live.	Comments noted	24811
	Private individual	I am not convinced that the housing need cannot be met in Ipswich alone. Large parts of brownfield land should be developed before shipping the need to less sustainable villages/towns. If it is truly evidenced that the needs cannot be met within IBC boundaries this should be accommodated from Copdock/Washbrook to Sproughton to Claydon to Martlesham then running within the A12 / A14 to the Orwell Bridge where appropriate. This should exclude any environmental aspects i.e. Pipers Vale.	The Council regularly carries out viability assessment on existing brownfield site allocations and is required to look at peripheral sites to consider sites which may make up any shortfall.	24656
	Private individual	A principal criterion for selecting development sites should be the alleviation of pressures on the town centre. There is already too much traffic circulating around the town centre and it is damaging the environment and endangering health. There should be scope for developing housing and additional infrastructures on the periphery of the urban area and beyond, and it should be possible to do this in a sustainable way.	The Council understands the importance of Air Quality, particular in the Town Centre and is proposing a new policy to help address this. Housing in the peripheral urban area is always considered and is reliant on the relevant infrastructure and guidance from Suffolk County Council Highways.	24724
	Railfuture East Anglia	Of the options presented the best seems to be a blend of options 4&5. Key to maximising sustainable travel will be to focus development in and around towns with good access to the rail network. Woodbridge, Felixstowe and Saxmundham are on the rail network whereas (for example) Framlingham is not. A study of estate agents web sites reveals that "distance to nearest rail station" has overtaken school catchment as being the most important consideration when choosing where to live.	Comments noted	25014
	Ashfield Land Limited	The Local Plan Review should, in the first instance, focus development that cannot be accommodated within the Borough in those areas closest to the Ipswich urban area. Such areas are more closely aligned to the services, facilities and employment opportunities available within the Ipswich urban area. It may also be appropriate to accommodate lesser levels of growth within the wider HMA.	Comments noted	25041
Pigeon Investment Management Ltd	Ipswich Borough Council should look to sustainable locations with good infrastructure, high accessibility and connectivity to Ipswich. For example neighbouring satellite villages around Ipswich such as Claydon, Sproughton and Wherstead can assist in delivering the housing growth to meet the objectively assessed need for housing in the Borough. These areas are well connected to the town. Another example is the need for liaison with Suffolk Coastal District Council on the potential of growth corridors to the Felixstowe Peninsula, and along the A12 corridor around Saxmundham which can deliver housing growth.	Comments noted	25364	
Conservative Group (Cllr)	New developments should take place as close as possible to Ipswich but within the neighbouring districts. As the tax revenue for new developments would be lost to Ipswich it is vital that these developments rely on the main economic services of Ipswich which will bring a benefit to the town.	Comments noted	25289	
Q19: Should Ipswich switch employment land to housing use, even though the Borough has a high jobs target? Where should the Council prioritise protecting employment land?	On Behalf of The Kesgrave Covenant	No, there is a need for land for both economic growth and housing growth, so converting existing and viable employment land to housing has no net benefit. Clearly there may be small scale changes to employment land allocations to reflect commercial realities, but as a general principle, it is a self-defeating strategy in the context of the Ipswich economic area.	Comments noted	24870
	On Behalf of AquGen	AquGen notes the identification of employment land as a potential alternative sources of residential land. This is acknowledged as a sensible policy option given the OAN. At this stage we note that there has been no actual published assessment of the suitability of employment sites for continued B class economic development. The consultation document refers to the assessment of sites under the ELSA 07/2017 yet this has not been published. This is a significant shortcoming of the consultation process as it leaves landowners unable to comment on the findings of the ELSA in terms of specific sites and land allocation decisions.	The Council has taken care with the production of the ELSA and this is being prepared for publication at the time that this schedule is being completed. Its earlier production while desirable was not a pre-requisite to progress and does not affect the soundness of the plan. Its current publication will help inform the Reg19 Draft Local Plan stage when site specific considerations will once more become important.	25100
	Northern Fringe Protection Group NFIG	Whilst accepting the need for providing sufficient employment land sites that offer flexibility to potential employers, the current Local Plan has over a 150% margin over the assessed employment need. Apart from the missed opportunity of sites remaining undeveloped through excess capacity, there is the issue of brown field sites remaining unregenerated in a manner that makes Ipswich appear a less attractive and vibrant town. There should be an opportunity to make some reallocations from land currently protected for employment use to housing. Similarly there is an over provision of the allocation of retail space.	The current retail study states that there is a shortfall of retail space in Ipswich, however it is noted that long-established vacant brownfields sites could be re-allocated for housing where appropriate.	24971
	Private individual	Yes - large bits of land around 'Ipswich Dock' on the eastern side could be used for housing, is there a need for all of the timber merchants within the town?	These sites have been explored through the SHELAA and have subsequently been proposed for allocations accordingly.	24657
	Private individual	Generally speaking, I would say that space-efficient employment facilities (e.g. offices, labs etc) are good for the town centre, providing there is a good public transport system for commuters. On the other hand, there is a strong case for encouraging industrial premises that occupy larger surface areas with less employees to move further out towards the borders of the Ipswich area.	Comments noted	24723
	On behalf of FIS Property and Landsec Limited	It is considered that Ipswich should switch employment land to housing use notwithstanding that the borough has a high jobs target. In this respect the Council should prioritise protecting high quality employment land which meets the needs and requirements of modern industry/commerce. Other employment land should be considered for housing or mixed use development particularly where more efficient use can be made of that land and urban regeneration results.	Comments noted	24872
	Private individual	No switching should take place. Protection of employment sites is vital for the economy. The best local plan is one that is smart enough to plan for mixed land use. A local plan that has a focus on housing development will lead to unbalanced planning.	Comments noted	24773
	Ashfield Land Limited	There will be instances where the reuse of existing employment land for residential development is appropriate. Sufficient flexibility should be provided for sites that are no longer appropriate or required for employment purposes to come forward for alternative uses. This would not on its own be sufficient to meet the levels of growth required across the plan period.	Comments noted	25042
	Pigeon Investment Management Ltd	With a high jobs target a wide variety of employment land is needed to provide flexibility in the employment land market. The requirements of businesses vary significantly and to meet the jobs target an over provision of employment land is required. This approach was found sound in the recent local plan examination in the Borough.	Comments noted	25365
	Conservative Group (Cllr)	Employment land is vital to the economy of Ipswich but drawing lines on a map is never an exact science. Consideration should be given, where appropriate, for change of usage for any piece of land within the Borough on a case by case basis.	Comments noted but a consistent approach is required, notwithstanding this, there are certain permitted development rights in place when it comes to changing the use of existing businesses to residential uses.	25290
Q20: Is there other land within Ipswich Borough which should be considered for residential development? Is the approach to protecting open space the right one?	Ipswich Community Media	We like the idea of new housing right in the heart of the town and on the waterfront, so there are no ghettos in the town. I.e. - the waterfront genuinely has a mixed economy, rather than just top end flats. We like the coop becoming a new school - so there is life and youth in the heart of the town.	The Council encourages a mix of housing tenure through Policy CS8 and will continue to do so. The proposed school is ongoing.	25465
	On Behalf of The Kesgrave Covenant	Yes, specifically SHLAA site IP184 and adjoining land within the Ipswich/Suffolk Coastal boundaries, as per our separate 'call for sites' responses to both Ipswich Council and Suffolk Coastal Council. Whilst it is inevitably the case, therefore, that part of Ipswich's OAN will be 'exported' to neighbouring areas, and whilst it is the case that opportunities for accommodating further growth within the Ipswich boundary are limited, the fact remains that there are development options on and adjacent to the Ipswich boundary (including some of the remaining areas of countryside within the IBC boundary, as recognised by the Local Plan Inspector in his findings), and logic dictates that these should be the first opportunities to be used, before consideration is given to distributing development further afield	Comments noted and the sites referred to will be considered for potential allocation as part of the Local Plan review.	24873
	Sports England	Sport England considers that existing open space of community/amenity value (including playing fields and other outdoor sports facilities) should be protected from development, unless replacement provision of equivalent or greater quantity, quality and accessibility is proposed.	The Council understands the importance of Open Spaces and will only consider redevelopment of these sites where there has been a surplus identified and/or equal quality replacement facilities can be provided elsewhere.	24877
	On Behalf of AquGen	Futura Park and the remaining plots that are currently allocated for B-class employment. The plots have been made available since 2012 and yet have not attracted any mainstream B-class developers. This is significantly beyond the current 12-month period for positive consideration of alternative use under Policy DM25. This provides a clear market signal that the land should be considered for alternative use within the wider 'Economic Development' definition. This will ensure that the Site can continue to make a positive contribution to the local economy through job creation, inward investment and diversity.	Comments noted, the viability of all sites is regularly reviewed.	25101
	Northern Fringe Protection Group NFIG	There is an over provision of land allocated to retail space within Ipswich. It was a mistake for the current Local Plan to extend the Ipswich Central Shopping Area to include the Westgate Quarter. This decision should be reconsidered and the land incorporating allocations IP40 and IP41 reallocated for mixed residential and employment use. It is not realistic to release large areas of protected open space, within the Borough to residential development, given the current shortfalls of Open Space. We strongly oppose any attempt to use what little remaining countryside there is in the Borough for homes.	The Council comments that there is a requirement for more retail space as identified in the Retail Study but will considered mixed-uses on sites allocated for retail where appropriate.	24972
	Greenways Countryside Project	Protecting existing open space is vital. To meet the needs of a growing population and in light of declining wildlife populations, all the open space in Ipswich is needed and more. Any change of policy to allow building on open spaces would be significantly detrimental and unsustainable.	Comments noted	25343
	Suffolk Preservation Society	SPS considers that open space in urban areas is valuable to well-being and residential amenity and should be protected.	Comments noted	24703

	On behalf of RSPB	It is not only essential that the protection of green space is upheld, but also that the overall tone of such a question should be about enhancing these areas. Evidence shows that those who live within 500 metres of accessible green space are 24% more likely to meet recommended health levels of physical exercise.	Comments noted	24646	
	Private individual	Yes - if Ipswich is really struggling to meet its housing needs then surely a town centre recycling centre should be reallocated elsewhere. Car parks are plentiful within the town. Why not turn a number of the car parks into multi-storey car parks and build on the other car parks. Cheap car parking is plentiful in the town. A reduction in the number of car parking spaces could seek to promote sustainable modes of transport reducing the traffic in the town	Comments noted, a multi-storey car park has been completed at Crown Street and another is allocated on West End Road.	24658	
	Ipswich Wildlife Group IWG	The existing open spaces in Ipswich are vitally important and need to continue to be protected from development for the benefit of the growing population and wildlife.	Comments noted	24822	
	On Behalf of Merton College	Merton College takes this opportunity to identify its land holdings at Rise Hall, located in the Ipswich Fringe. Whilst the College acknowledges the unfavourable SHLAA assessment Akenham, in the context of the potential link road (Ipswich Northern Route), Rise Hall, can assist in delivering sustainable housing growth in the HMA. The provision of a comprehensive proposal in this location could assist with the delivery of strategic infrastructure associated with the emerging relief road around Ipswich. The site has been submitted to Babergh and Mid Suffolk Councils' and Ipswich Council's Call for Sites.	Comments noted, the site is not within the boundary of Ipswich and therefore is not under our planning control. The Council recognises the strategic importance of this area for the wider Ipswich HMA and potential Northern Routes and will be considered through the SHLAA process.	25109	
	Pigeon Investment Management Ltd	To achieve employment growth targets a wide range of employment sites are required. There is little countryside in the Borough that is accessible and developable. Given the demand for housing in the last 20 years the delivery of sites in the Borough which have not been taken up over this period should be questioned. The only remaining option to meet the Objectively Assessed Need for housing is to develop land outside the Borough in neighbouring Districts	Comments noted, All areas are explored for development through the SHLAA	25367	
	Conservative Group (Cllr)	The Conservative Group believes in the continued protection of the Borough's open spaces but also recognises the desperate need for housing land. As with other choices development should be considered on a case by case basis. Ipswich is extremely well served with open spaces both large and small. If housing pressures continue to grow, then we would be foolish to deny the opportunity to even discuss the possible change of usage to any piece of land.	Comments noted	25291	
The Provision of Retail and Leisure Development	Q21: Where do you think the most appropriate locations are to meet this [provision for Gypsies and Travelers] need?	National Federation of Gypsy Liaison Groups NFGLG	Policy CS11 in the adopted plan is not fit for purpose and needs radical review. It is not compliant with current planning legislation. Amongst other concerns we consider that: * the implied requirement to show a lack of existing availability is unacceptable; * the requirement to be within 1km of services is unrealistic and unduly restrictive; * the need for sites to be large enough to accommodate business activities is unnecessary. There is also a desperate need for a more pro-active approach to site provision.	Comments noted	24805
		Suffolk Constabulary	An out of town location is preferred. New sites should be below 20 pitches. It is essential to consult closely with traveller groups, local residents and the police at the start of any site consideration and follow government advice on best practice.		24845
	Q22: Which town centres should we plan to expand?	Babergh Mid Suffolk	In the consideration of retail and leisure options which have strategic significance, where relevant, regard should be given to the Babergh and Mid Suffolk Joint Town Centre and Retail Study (2015) and the proposals set out in the Babergh and Mid Suffolk Joint Local Plan Consultation Document. The proposals and policy approach seeks to protect and enhance provision across the network of market towns and restrict out of centre provision which could be detrimental to this objective across Babergh and Mid Suffolk.	Comments from Babergh and Mid Suffolk noted. The findings and outcomes of the Babergh and Mid Suffolk Joint Town Centre and Retail Study (2015) will be borne into consideration in devising any town-centre/ retail related policies.	25400
		Ipswich Limited	The long-throne nature of Ipswich Town Centre from what was the West Gate to the East Gate, should be restored.	Comments noted. It is interpreted that the existing Town Centre Boundary defined on the Policies Map includes the historic West Gate and East Gate parts of the town.	25406
	Q23: Are there town centres that should be reduced in size?	Historic England HE	The town centres in Ipswich and Suffolk Coastal are historic and contain significant concentrations of designated heritage assets. Retailing is changing and that has an impact on the buildings housing them, many of them historic. Each centre is different but consideration needs to be made of whether town centres are sustainable as currently constituted, the usages for buildings are correctly identified and they are adequately protected from harmful change of use or conversion. A planned approach to reinforcing the importance of the town centres as a sustainable location, and consideration of appropriate, alternative or additional uses which will provide a strong future for the buildings, is key. A further consideration is the retention of original/historic or significant shopfronts. A development management policy should be in place to manage their change successfully.	The high concentration of designated heritage assets and the need to plan sustainably for town centres is noted. Policies relating to shopfronts will be explored as part of the Local Plan review process.	24908
		Private individual	Reduce the town centre in Ipswich - no need for the size it is. The world has moved on.	Comments noted. Any modifications to the town centre boundary will be considered as part of the Local Plan review process, taking the recommendations of the Ipswich Borough and Suffolk Coastal District Retail and Commercial Leisure Study (2017) into account.	24793
		Conservative Group	The group believes in a general shift of the focus of Ipswich Town Centre from its current east/west axis to more of a north/south axis. The edges of the current town centre (Carr St & Westgate St) are perfect examples where a change of usage should be considered. Many of the retail units are either empty or filled with temporary shops and those retail units that are successful could easily be relocated to other areas. We could introduce more town centre living and then concentrate the retail and leisure offering from the current town centre towards the waterfront. Ipswich is not big enough to be able to develop the area towards the waterfront whilst still attempting to retain the same length of high street running through the centre.	The observed shift in the focus of the Town Centre and suggestion to diversify the edges of the town centre are noted.	25292
	Q24: Which sites should be identified through the Local Plan reviews for future retail growth?	Conservative Group	We do not need to increase retail space within Ipswich. There remain acres of unused land at the Crane site, empty units in the town centre and at all the shopping parades within the borough. We do believe in promoting growth in the local shopping areas and edge of town sites currently in operation.	The comments regarding the lack of need for retail space and high vacant units are noted.	25293
	Q25: How do we increase the range of uses or activities in Ipswich town centre, given its role as a regional centre, and what should they be?	Ipswich Community Media	Please support and expand the nightlife in a QUALITY - we have been told first hand by authorities, that larger new good music sites are not really wanted due to keeping people in the cardinal park area. We run a small music hub but crying out for genuine music arts centre in the town. Support a growing arts and music centre and WET arts studios hubs! They DO bring in revenue!	Comments and suggestions regarding nightlife and music provision noted.	25466
		AquiGen	We recommend that the emerging Plan proactively explores and identifies alternative land use policy options which in themselves can have benefits for the Town Centre (e.g. residential).	Comments noted and potential opportunities to identify alternative land uses in the Town Centre will be considered as part of the Strategic Housing and Employment Land Availability Assessment which will inform the Local Plan process, as well as any relevant development management policies.	25104
	Historic England HE	The town centres in Ipswich and Suffolk Coastal are historic and contain significant concentrations of designated heritage assets. Retailing is changing and that has an impact on the buildings housing them, many of them historic. Each centre is different but consideration needs to be made of whether town centres are sustainable as currently constituted, the usages for buildings are correctly identified and they are adequately protected from harmful change of use or conversion. A planned approach to reinforcing the importance of the town centres as a sustainable location, and consideration of appropriate, alternative or additional uses which will provide a strong future for the buildings, is key. A further consideration is the retention of original/historic or significant shopfronts. A development management policy should be in place to manage their change successfully.	See previous HE response (24908).	24909	
	Private individual	Re-evaluate supply/demand for the main town. There has been a drive to bring large retail chains to the town but it contradicts what is happening (large retail at Futura Park and Martlesham). I only go into Ipswich for specialist shopping, the station and football club, i.e. things I cannot find online. People go to a town centre for the experience and that has to be unique rather than replicating all other towns. We need a drive to develop spaces to offer the right space for small retail, boutique business and for specialist start-ups to thrive in, providing a unique experience.	Comments noted regarding supply/ demand for the main town and will be considered as part of review of Local Plan.	24786	
	Private individual	Ipswich town centre has various activities but in certain times lacks energy and variety. To increase activity, use both its significant history and the picturesque areas e.g. the Waterfront. Currently the centre is mainly about shopping and it gets really quiet in the evenings. Create a 'Heart of Ipswich' walk or tour visitors can enjoy or a route that will include walking, cycling, education and entertainment that will go from A to B (Waterfront to the North) and be designed considering the character of the route, not worrying about A or B. A route for locals and tourists to enjoy.	Comments regarding the lack of activity in the town centre and will be borne into consideration as part of Local Plan review. Suggestions regarding improved walking experience and tourism noted.	24795	
	Private individual	Thought needs to be paid to the huge number of empty retail units on Duke St/Stoke Quay development conducted within the past 10. Duke Street already has a Tesco's, a couple of takeaways, hairdressers etc therefore I do not see what other businesses would be interested in moving into the units. Future developments should use this falling and include only a limited amount of retail units should be included, and the land may be better used as a car park or for community use. If used as under flats car parking this would free up land to increase the density	Comments regarding empty retail units noted. Comments relating to provision of retail and other uses will be considered as part of the Strategic Housing and Employment Land Availability Assessment which will inform the Local Plan process, as well as any relevant policies.	24659	
	Private individual	Start turning many of the shops which are not used into residences and putting boutique shops around the town. It would also be nice if we could start encouraging more cafe style of living within the town and increasing the number trees rather than planters. Stop the number one problem: fear of going into town after dark. The town needs to find ways of reducing violence and the number of drugs within the centre at night. One of the ways of dealing with drugs would be to increase the number of police and dogs at the station entrance.	Comments regarding town centres noted and will be considered as part of Local Plan review process. Concerns regarding violence and drugs also noted. IBC is not responsible for the number of police and dogs as this is the responsibility of Suffolk Constabulary.	24834	

	Suffolk Constabulary	Any redevelopment of the town centre must factor in both anti-terror mitigation features as well as Designing Out Crime advice. In both cases, quality CCTV should be included. Incentives should be offered to (smaller) independent shops to help create a sense of identity. Increased promotion of the town through events such as Christmas markets and attractions such as Pigs Gone Wild that encourage people who may not normally come into the town centre to visit. Provide more park and ride options (i.e. re-open Bury Rd, even if only for peak periods).	Comments regarding CCTV and crime-prevention measures noted. Promotion of events and park and ride options is not managed through the Local Plan Review process.	24846	
	Private individual	We should protect all the current green spaces in the town centre and perhaps include extra small parks and gardens where possible. A conference and exhibition centre near the Waterfront could be a positive development that would help promotion of local businesses.	Comments noted.	24725	
	Ipswich Central	IBC has shown an entrepreneurial approach to granting permissions for more mixed uses alongside retail. This must continue, as town centres can no longer be sustained on retail alone, and require a much broader range of leisure, service and experiential-based occupiers. Additional reasons to visit and stay, including additional hotel space and attractions, must be planned for. A new visitor experience must be encouraged on the Waterfront, where further increases in the height of buildings opens up views northwards to the Park and beyond, and southwards. Any opportunity for the creation of a cultural hub, incorporating existing operators. As part of the redevelopment of the Cornhill, detailed plans should be made for the future use of the new Square to create a vibrant community space that operates as an important, managed open space attraction.	Comments of support appreciated. Hotel space and attractions will be planned for in accordance with the recommendations of the Retail and Commercial Leisure Study (2017). Comments regarding waterfront and cultural hub noted. The public space outside the Cornhill will be included in the Public Realm Strategy Supplementary Planning Document which is being prepared.	25091	
	Ipswich Community Media CIC	Support the development of the arts centre for Ipswich campaign and other grass roots cultural development.	Comments noted.	25248	
	Conservative Group	Instead of trying to compete with other better served retail centres such as Norwich, Colchester, Chelmsford, Freeport Brantree and Bury St Edmunds we should aim to become the main centre for culture and leisure activities whilst retaining our retail offerings.	Suggested approach for Ipswich to become the main centre for culture and leisure activities whilst retaining retail offerings noted and will be considered as part of Local Plan review.	25294	
	Private individual	Make the old BHS store into an indoor market.	Comment noted.	25534	
Q27: What approach should be taken to further out of centre shopping? Does out of centre shopping complement or compete with the existing town centres?	On Behalf of AquiGen	The Evidence Base published to date identifies that in terms of the Town Centre, present policy tools have been effective in managing out-of-centre development and ensuring it can be complementary. In formulating policy for retailing in the Ipswich area, we consider that the present NPPF Sequential and Impact tests are entirely adequate for the purposes of controlling any further proposals for out-of-centre retail development.	Comments noted. Any review of the Local Plan will need to comply with national planning policy.	25105	
	Private individual	Personally I am not very positive about the remote shopping centres. Yes, they are in some cases needed if they are close to dwellings, but their current design promotes the use of cars. They are often remote and don't provide sustainability at all. If something like this is needed then it should integrate to the existing landscape, considering the environment.	Concerns regarding out-of-centre shopping noted.	24796	
	Ipswich Limited	There is a worrying trend of retail parks selling non-bulky items which is unacceptable competition for the town centre. Whether it is B&M or Currys PC World, most of the products are small enough to not be impractical to purchasing in the town centre.	Concerns noted.	25407	
	Conservative Group	Further out of town shopping should be encouraged where appropriate. Access to these sites is better and they provide more opportunities for larger retailers who struggle to find anything of a suitable size in the town centre. They also have the added benefit of reducing the traffic in and around the town centre which in turn makes it a more attractive place for culture and leisure activities.	Support for appropriate out-of-centre shopping noted.	25295	
	Private individual	Encourage Ikea to Ipswich. The sugar beet site on Sproughton Road would be ideal, direct access from the A14. Would bring people in from the surrounding areas.	Suggestion of encouraging a large-scale retail unit at the sugar beet site on Sproughton Road noted.	25512	
Q28: Should the existing retail parks be considered as centres in their own right, or should town centres continue to be the first choice location for new shops and leisure uses?	On Behalf of AquiGen	The ability to robustly and credibly define a Retail Park as a 'Centre' does rely on the relationship of the Park with the NPPF definition of a Town Centre. NPPF requires a Plan to include strategic policies for the provision of inter alia retail development. This supports the introduction of specific policy recognition for a Retail Park and the formulation of positive policies to identify an opportunity to evolve, support a specific need and enhance provision across an area. In this context we recommend that Futura Park warrants identification as a strategic Retail Park site. Furthermore, affording the opportunity for a de facto extension to the east of Nacton Road would enhance the complementary relationship which exist with Futura Park.	Recommendation to identify Futura Park as a strategic Retail Park site and possible eastwards expansion noted.	25106	
	Ipswich Limited	Retail parks are centres in their own right. If local shops can be designated as local centres and district centres, the much larger floor space retail units can definitely be considered centres in their own right, especially with the nature of them being a destination.	Position on retail parks being centres in their own right noted.	25408	
	Conservative Group	Retail Parks should be considered as centres in their own right.	Position noted.	25296	
Infrastructure	Q29: What infrastructure is currently required in your area and what additional infrastructure do you think would be needed, and where, to support the future distribution and levels of growth outlined?	Associated British Ports ABP	ABP will continue to assist the Council in developing a feasible solution for the Upper Orwell Crossings and for all modes access to the Island site. ABP also supports the efforts of IBC and SCC to progress the Ipswich Northern Route Study and to bring forward proposals to secure transport capacity improvements which will benefit strategic and local traffic accessing and egressing the Port.	Support for the Upper Orwell Crossings noted. At the time of this response a further costings and feasibility study were being completed.	25078
	Suffolk Wildlife Trust	All areas need sufficient high-quality greenspace, with good connectivity to and through the network. Given the variety of spatial options which could, at this stage, come forward through the Plan, it is difficult to offer conclusive comments on the infrastructure which will be needed, but relevant issues to consider are as follows. Transport, see question 30; education, see question 32. Fire and Rescue: the Local Plan should create safe and accessible environments in respect of infrastructure needs, access by services and water supply. Libraries: modern libraries are the hub of communities and may be a relevant consideration in determining settlement hierarchy and levels of growth. Waste: the Plan should support sustainable waste management and reduce demand on waste infrastructure. Current facilities at Foxhall Road and Portman's Walk are over capacity.	Noted Comments noted. The Portmans Walk WRC is the subject of ongoing consultation with the Suffolk MFLP. Other infrastructure needs will be the subject of further joint working.	25015 25457	
	Suffolk County Council SCC	A northern relief road will be required to accommodate the build-out of the Ipswich Garden Suburb and ease current congestion. Road improvements are required to alleviate existing congestion in the town centre and will also be required to accommodate new developments. The Ipswich Garden Suburb SPD infrastructure requirements are all required, as are those specified as conditions to planning applications. Air quality urgently needs improving before encouraging cycling and walking in AQMAs. Improvements to Westerfield Railway Station and the Ipswich-Felixstowe line are required, and an assessment of the viability of a further station in the vicinity of Futura Park.	The Ipswich Garden Suburb is capable of being delivered with additional traffic management measures and junction improvements within the existing highway network. The Northern Distributor route is likely to be considered as a free standing project which will be developed further over the initial phases of the plan period. Air Quality measures are being introduced through a new policy and further rail improvements are being explored with partners. At this stage a new station at Futura Park looks unlikely due to financial viability.	24973	
	Save our Country Spaces SOCS	Road improvements are required to alleviate existing congestion in the town centre and will also be required to accommodate new developments. The Ipswich Garden Suburb SPD infrastructure requirements are all required, as are those specified as conditions to planning applications. Some are needed ahead of development. SOCS still oppose multiple starts. Air quality urgently needs improving before encouraging cycling and walking in AQMAs. Specific cycling/walking measures need to be implemented. Improvements to Westerfield Railway Station and the Ipswich-Felixstowe line are required, and an assessment of the viability of a further station in the vicinity of Futura Park.	Please see comment above.	25059	
	Greenways Countryside Project	Additional significant areas of semi-natural greenspace are required (in addition to the proposed Garden Suburb country park) across the Ipswich Policy Area to sustain the likely levels of housing growth. Orwell Country Park requires the inclusion of all of the land at Pond Hall Farm to allow sustainable access and reduce disturbance of overwintering wildfowl in the Orwell Estuary SPA.	The Plan will maintain commitment to the concept of inter-connected open spaces that can be used for both natural wildlife corridors and dual-purposed for cycling and walking. The Plan will also seek to consolidate a "green rim" running as a network of loosely connected sites around the edge of the town. Pond Hall Farm will remain an important element of the network.	25344	
	Tuddenham St Martin Parish Council	Improved public transport provision and transport links are required that meet the needs of the community and neighbouring communities. These include buses which tie in better with local school timetables and improvements in the travel service between neighbouring villages in order to reduce individual car journeys. Cycle provision should also be improved, particularly utilising bridleways and footpaths where appropriate to enable movement away from main roads.	Comments Noted.	24927	
	Natural England NE	We note the reference to the Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (page 39) and agree that the implementation of this strategy within Ipswich Borough and neighbouring districts will result in new residential development having no likely significant effect in combination on internationally designated sites. New figures for predicted housing growth will need to be included in the evidence base and the tariff calculations for the strategy.	Comment welcomed.	24998	
	Historic England HE	The Landscape Character Assessment and Landscape Sensitivity Study should include heritage assets and their settings, e.g. scheduled monuments, registered parks and gardens, conservation areas. This should prevent the Study identifying an area of land containing, e.g. a scheduled monument to have low sensitivity to development. We also note that design and heritage assessments are planned. Given the historic nature of the district and Borough and the levels of growth proposed, it is likely that heritage impact assessments will be needed for sensitive sites to identify whether/how much development is possible and whether mitigation or enhancement measures can be incorporated.	The Council's evidence base is comprised of many documents and mapped constraints to development, including Heritage Assets and Ancient Monuments.	24915	
	Suffolk Chamber of Commerce	We support Better Broadband for Suffolk to roll out superfast (24 Mbps) broadband and: 100% coverage by the end of 2017; business prioritisation; and 100% 100 Mbps coverage by the end of the decade. The Plan policies should take account of the very real need, for new developments and retro-fitting. Likewise we hope that the Plan will include policies which promote 100% 4G mobile technology coverage by all networks, through provider collaboration where possible. Regarding utilities the Plan should ensure that water provision, waste water disposal and electricity provision at all employment sites are adequate for present and future needs.	Comments concerning utilities noted. The NPPF 2018 provides support for Councils (para 110) to deal more firmly with Broad band and mobile technology.	25166	
	private individual	Ipswich is very wide in comparison to other towns. This does not help in making the whole town accessible. Go north (with development), put the infrastructure in and build the northern route. Also provide proper cycle roads. [See also response to Q4 regarding cycling infrastructure].	The Council will continue to develop proposals for cycling and walking as opportunities present themselves within major development proposals. Preparatory studies for the Northern Distributor Road are being developed for further consideration and public consultation. Cross town bus services have been trialled previously, but found to be non-viable without public subsidy. The Upper Orwell Crossings are the subject of a financial review at the time of response.	24788	
	Private individual	Whilst not a planning issue if Suffolk C.C. actually sent buses where people wanted to go there would be a reduction of traffic in the town and no need for a northern Ipswich bypass. The wet-dock crossing is a must as this will have a positive impact on the town - please do not back down on this due to political pressure. The future of Ipswich is far more important than a temporary MP.		24660	
	Private individual	Major improvements to the A12 (e.g. Four Villages bypass) are critical. It is known that improved infrastructure bring economic benefit as well as improving productivity.	Comment noted - works beyond IBC plan area.	24684	
	Ipswich Wildlife Group IWGr	Ipswich needs more significant green spaces to sustain increased levels of housing and population growth.	Comments welcomed	24823	

	Suffolk Constabulary	Work as described to alleviate the one way system (i.e. new bridges and access). Proportionate provision of schools, medical facilities etc with every new development. Consideration of the impact on the ability to police newly developed areas and contributions towards additional costs.	Comments noted	24847
	NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)	Growth, in terms of housing and employment, is proposed across a wide area and would likely have an impact on future healthcare service provision. This response relates to the impact on primary care services only. Existing GP practices in the area do not have capacity to accommodate significant growth. In terms of optimal space requirements to encourage a full range of services to be delivered within the community there is an overall capacity deficit, based on weighted patient list sizes', within the 16 GP Practices providing services in the area. Policies should be explicit in that contributions towards healthcare provision will be obtained and the Local Planning Authority will consider a development's sustainability with regard to effective healthcare provision. Notwithstanding this, there should be a reasonably worded policy within the emerging LDP that indicates a supportive approach from the Local Planning Authority to the improvement, reconfiguration, extension or relocation of existing medical facilities. This positive stance should also be indicated towards assessing those schemes for new bespoke medical facilities where such facilities are agreed to in writing by the commissioner. New facilities will only be appropriate where they accord with the latest up to-date NHS England and CCG strategy documents and are subject to the NHS England prioritisation and approval process.	The Council is now engaged in the exchange of information necessary to ensure a clear understanding of the growth pressures that accompany planned development and the possible long term effects on the NHS Sustainability and Transformation Plan for the Ipswich area.	24893
	private individual	The development of the Island Site sounds like a good idea, but I have strong doubts about how the planned vehicle bridge could affect traffic across the southern part of Ipswich. If it draws traffic away from Star Lane and College Street, it could merely shift congestion away from these areas into other residential areas of the town, especially if it draws traffic off the A14 as well. Modelling of the possible effects of the new infrastructure has focussed on journey times; it should focus on potential pollution levels.	The Upper Orwell crossings are under review at the time of this response.	24726
	Private individual	Chaos is what happens when the Orwell Bridge is closed because of either weather or an accident. The Princes Street Bridge by Ipswich Station needs improvement	Comments noted	24748
	Railfuture East Anglia	Improvements to the local rail network. Atkins consultants for 'East-West Rail' are advancing the case for increases in the frequency of rail services into Ipswich from Bury St. Edmunds and Felixstowe but this will require additional platform capacity at Ipswich and double tracking the Felixstowe line. Ipswich Garden Suburb should benefit from a relocated station at Westerfield to provide sustainable transport links to the rest of the network. The East Suffolk line should be double track as far as Saxmundham (currently only as far as Woodbridge). This would enable the services to run every half hour to Woodbridge and Saxmundham and provide Woodbridge with a more attractive service into Ipswich.	There may be space available for additional platforms at the Ipswich station but the decision to make such an improvement is a commercial decision rather than a matter for planning policy. The Council is working with Network Rail and Greater Anglia to improve the East Suffolk line with a view to encourage new IGS residents to participate in rail travel.	25011
	Gladman Developments	It is positive that the future infrastructure and transport requirements for the Ipswich urban area are being considered at a strategic level through the plan making process and that projects are underway to explore alternative options for east-west routes. The Local Plan provides the opportunity to manage growth in a manner that supports infrastructure delivery by setting a framework to shape investment in housing, employment sites, schools, health care facilities, community facilities, retail, public transport and roads. Garden Villages provide an opportunity to deliver a number of key objectives in this regard.	Comments noted	25392
	Ipswich Limited	A dual carriageway Northern Bypass, Copdock Interchange and Nacton Junction upgrades, and rail upgrades as specified above in another question.	Comments noted.	25409
	Associated British Ports ABP	ABP requests the identification of the Port of Ipswich as a strategic transport hub and the inclusion of policy (ideally) and wording which specifically seeks to support and protect the function and role of the Port in the town. ABP would like to see improvement of the junctions on the A14 around Ipswich in order to accommodate existing and future growth. ABP supports the efforts of IBC and SCC to lobby Highways England for such improvements and investigation of other potential improvements to the A14 and A12(S) corridors.	Comments and Support noted	25079
	Suffolk County Council SCC	Opportunities to maximise walking, cycling or using public transport must be a key part of working through the spatial strategy. Further road capacity serving Ipswich may also be necessary. This can be assessed using the SCC Transport model. We welcome the potential to integrate consideration of the feasibility of a new northern route during the local plan review process. It may be required to mitigate the impact of further growth needed to meet currently identified need, but higher levels of growth may be necessary to secure sufficient funding. Proposals along the A12 corridor would offer the opportunity to use the East Suffolk rail line. SCC would like to explore opportunities to enhance walking and cycling connectivity between Ipswich and Martlesham, and within Ipswich. The double tracking of the Felixstowe Branch is an opportunity to promote greater modal shift. The cumulative transport impact of the development of sites will need to be the subject of further work to address issues such as cumulative impacts of development on routes in, around and through Ipswich, including the strategic A14 and A12 routes.	The Council welcomes the opportunity to develop these comments further during the plan preparation process.	25445
	Northern Fringe Protection Group NFIG	Traffic flows and air quality need to be monitored and assessed as new developments are built out under current Local Plans, and remedial action taken when required. Until such remedial action has been shown to be effective, further development around problem areas should be curtailed. Planning conditions relating to transport infrastructure/travel plans should be enforced. Cross-boundary Transport Assessments are required for the draft Local Plans and any remedial measures identified, tested (through modelling) and implemented. Assess the viability of direct cross-town bus routes that avoid the need to go into the town centre, e.g. Ransomes via the hospital to Whitehouse.	Air quality will be monitored in support of the Council's Air Quality Management Plan. (AQMP) Development Management decisions will also have regard for the proposed AQ management policy which will allow planning permission to be refused where AQ standards are breached.	24974
	Save our Country Spaces SOCS	Traffic flows and air quality need to be monitored and assessed as new developments are built out under current Local Plans, and remedial action taken when required. Until such remedial action has been shown to be effective, further development around problem areas should be curtailed. Planning conditions relating to transport infrastructure/travel plans should be enforced. Cross-boundary Transport Assessments are required for the draft Local Plans and any remedial measures identified, tested (through modelling) and implemented. Assess the viability of direct cross-town bus routes that avoid the need to go into the town centre, e.g. Ransomes via the hospital to Whitehouse.	As above	25058
	Tuddenham St Martin Parish Council	Improved public transport provision and transport links are required that meet the needs of the community and neighbouring communities. These include buses which tie in better with local school timetables and improvements in the travel service between neighbouring villages in order to reduce individual car journeys. Cycle provision should also be improved, particularly utilising bideways and footpaths where appropriate to enable movement away from main roads.	This comment is well founded, but the provision of home to school education transport is the responsibility of SCC. Similarly, the references to bideways and travel between neighbouring villages would seem to refer to locations outside of the Borough. However the comments will be explored as the Council develops any ideas on a cross boundary basis.	24928
	Babergh Mid Suffolk	The importance of the delivery of the necessary infrastructure to support growth and development is recognised in both the Ipswich and Suffolk Coastal Plan Review and the Babergh and Mid Suffolk Joint Local Plan Consultation Document. We will continue to engage in future discussions on infrastructure solutions which will be critical to the ongoing economic prosperity of Suffolk. As a matter of detail with regard to the reference to page 4 please note that at this stage Babergh and Mid Suffolk Councils are not intending to undertake a revised Strategic Flood Risk Assessment or Water Cycle Study.	The Council will continue to cooperate on infrastructure delivery in the Ipswich area and especially on cross border issues as they are identified. The Council will keep its participation in the Community Infrastructure Levy under review but currently believes that it can realise its maximum contribution to the public infrastructure purse through the planning obligations process.	25401
	Private individual	There is a big opportunity to enhance rail services in the area by re-dualling the line section between Woodbridge and Saxmundham. With the new rail fleet due in 2019 the service can be made more frequent and of better quality, and with the promised through services from Lowestoft to Liverpool Street settlements close to the line could become more attractive housing areas, enhancing local economies. Redualling of the line would also extend freight services into Sizewell C.	The Council is working on the delivery of rail improvements through its participation in rail and infrastructure delivery groups.	24683
	Private individual	Extend Crossrail (Elizabeth Line) from Shenfield to Ipswich. Possibly look to have four track from Ipswich to Manningtree. (Could link in with new depot).	Decisions of this scale are beyond the scope of the IBC local plan and are the responsibility of Network Rail and the Dept. of Transport.	24749
	Network Rail	Network Rail's Anglia Route Study (2016) looks to forecast growth to identify key areas for improvement for the next ten years, to enable the network to meet future needs up to 2043 (see: https://www.networkrail.co.uk/running-the-railways-long-term-planning/). We would welcome engagement throughout the development of an Infrastructure Delivery Plan to ensure rail enhancements are accurately captured and funding sources identified. Enhancements currently identified in Network Rail's strategic planning for investment include: * Houghley Junction doubling, and * Enhancement and Liverpool Street Station. There is also an aspiration to enhance the East Suffolk Lines. In general, the need to close level crossings should also be considered where any development is likely to increase or change the nature of usage at a crossing. We would welcome a policy to support level crossing closures within the Local Plan.	The level of contact expected has now been established through the Growth Programme Board Infrastructure planning group. There are some reservations that development in Ipswich can be expected to contribute to Liverpool Street station improvements as this is unlikely to pass the tests expected for 106 agreements however, rail improvements that encourage the use of Ipswich station and contribute to people participating in rail travel to commute will be supported through the Growth Programme Board group.	24951
	Rail future East Anglia	Improvements to the local rail network. Atkins consultants for 'East-West Rail' are advancing the case for increases in the frequency of rail services into Ipswich from Bury St. Edmunds and Felixstowe but this will require additional platform capacity at Ipswich and double tracking the Felixstowe line. Ipswich Garden Suburb should benefit from a relocated station at Westerfield to provide sustainable transport links to the rest of the network. The East Suffolk line should be double track as far as Saxmundham (currently only as far as Woodbridge). This would enable the services to run every half hour to Woodbridge and Saxmundham and provide Woodbridge with a more attractive service into Ipswich.	Please see response to 25011 and as above	25012
	Conservative Group (Clr)	Rail links within Suffolk need to be updated to the 21st century with potentially more branch lines and stops especially if Ipswich is to rely on the surrounding areas to provide its housing needs. Ipswich is not a big enough town to support or need two large town centre bus stations and this should be addressed.	Comments noted	25297
	Private individual	Certainly all areas within Ipswich. The new surgery at three rivers is fantastic and can surely free up some cheap housing and funding for the NHS where the current small surgeries could be converted to housing quickly and cheaply	Comments noted.	24661
	NHS England	NHS England working with the CCG, Local Authorities and local stakeholders has begun to address Primary Care capacity issues in the area and currently have projects to increase capacity underway across Ipswich. These projects vary in size and will initially deliver additional capacity to meet current planned growth requirements to 2021. NHS England and the CCG would welcome further discussions with the Local Authorities with regard to density of development and cumulative growth over the plan period within specific areas, to understand the impact and how this may be mitigated. In line with the Five Year Forward View please replace the use of the description 'super surgeries' with 'primary care hubs' this represents the ambition to provide a range of services from within a single premises or across a number of sites within a locality rather than the sole provision of current GP services. Regarding infrastructure items please replace 'surgeries' with healthcare facilities.	Comments noted regarding preferred terminology. Appropriate contact for infrastructure planning has been achieved for the CCG but following ongoing transformation work further exchange with Ipswich Hospital Trust will be welcomed.	24894
	Conservative Group	Super Surgeries should be located in each quarter of the town along the same lines as the current Area Committees. They must be served by good public transport links to decrease the potential alienation of sections of the community.	Comments noted.	25298
	Suffolk County Council SCC	The Plan will need to consider existing available school capacity and constraints as part of the approach to the spatial strategy and ensure that sufficient land is identified to meet needs for additional or expanded schools. It should also set out a framework for securing developer contributions/land. Specific local issues will exist, particularly in relation to primary schools, but secondary school needs will have to be considered at a strategic level looking across local authority boundaries. The range of spatial options and different scenarios for growth under consideration mean it isn't possible to set out an education strategy at this stage. In recognition of the role of early education in enhancing educational attainment and improving social mobility, the plan should consider how best to provide for early education alongside a growing population. The Plan will need to take relevant steps to support the proper provision of early education facilities to meet statutory requirements.	Comments noted and the Council is aware of the trigger required to facilitate new school facilities and will work with the County Council where necessary.	25444
	Q30: How can the strategic transport connections be enhanced and improved?			
	Q31: In which areas should "super surgeries" be considered?			
	Q32: Is there a need for additional education provision in certain areas of the Housing Market Area, including early years and special educational facilities, and if so what is the need and where?			

Development Management Policies	Q33: What kind of outdoor recreational spaces would you like and where should we locate them to reduce pressure on the more sensitive coastal areas? What other measures could be put in place to protect sensitive environments?	Suffolk Wildlife Trust	All areas need sufficient high-quality greenspace, with good connectivity to and through the network. Circular dog walking routes of at least 2.7km with a start point within 400-500m of the properties. Such routes are needed to help ensure that sensitive designated sites (such as the Stour and Orwell Estuaries) are protected from the adverse impacts that can arise from such activities.	Comments noted	25016
		Suffolk County Council SCC	Public rights of way make an important contribution to Suffolk communities. They encourage travel by sustainable modes and physical activity, support the tourist economy, offer recreational opportunities for residents, give access to the local natural environment and can help manage the impacts of development on sensitive habitats and species. Policies should identify a means of ensuring that development protects and provides for enhancement of the rights of way network, both on-site and off-site cumulatively, at a strategic level. The policy framework should be set out in such a way as to link rights of way to the different objectives they support. The County Council would be pleased to review preferred sites to consider impact on the Rights of Way Network.	The Council has allocated green corridors to provide sustainable travel modes and will continue to protect this as part of the new Local Plan	25443
		Northern Fringe Protection Group NPPG	Outdoor recreational spaces need to be provided as near as possible to homes for easy access to minimise travel. They need to be located in areas that already have a shortage of any specific type of open space. We agree that protection of the Ipswich recreational and wildlife corridor 'green rim' around the town based on the earlier Haven Gateway Green Infrastructure Strategy is required.	Comments noted	24975
		Save our Country Spaces SOCS	Outdoor recreational spaces need to be provided as near as possible to homes for easy access to minimise travel. They need to be located in areas that already have a shortage of any specific type of open space. We agree that protection of the Ipswich recreational and wildlife corridor 'green rim' around the town based on the earlier Haven Gateway Green Infrastructure Strategy is required.	Comments noted	25057
		Greenways Countryside Project	Providing high quality open space close to where people live is vital to reduce journeys to more vulnerable sites (eg European Protected estuaries). Increased investment in local parks and open spaces would create a 'better offer' to local residents. Sites of high aesthetic and wildlife value along with popular facilities (eg: cafes, destination play features, dog play areas etc), are most likely to achieve this.	Comments noted	25345
		On behalf of RSPB	The RSPB welcomes IBC's commitment to the Recreational Avoidance and Mitigation Strategy (RAMS) and to develop a 'Green Rim' around Ipswich to alleviate recreational pressure on sensitive sites (SPAs). New developments should incorporate wildlife-rich appropriately accessible green space paying particular attention to the needs of dog-walkers and recognizing the wider benefits of protecting and enhancing sites for priority species and habitats. There are wider benefits to residents health and wellbeing to be had too. We refer IBC to https://www.rspb.org.uk/our-work/conservation/projects/kingsbrook-housing as an exemplar case study. We support partnership working to deliver the above.	The RAMS strategy is still under review and a draft will be published in due course.	24648
		Ministry of Defence MOD	The aerodromes are protected with statutory bird strike safeguarding consultation zones. Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking bird species hazardous to aviation safety.	Comments noted	24816
		Ipswich Wildlife Group IWG	Investment in parks, play areas and open spaces helps create much more attractive locations to live. Providing such areas where people live greatly contributes to their quality of life.	Comments noted	24824
		Suffolk Constabulary	More facilities for young people - especially informal facilities such as skate parks, BMX facilities and undercover areas where young people can safely congregate. On the outer boundaries of housing developments - carefully located to be within natural surveillance of but not a nuisance to surrounding homes and businesses.	Comments noted	24848
		Suffolk Constabulary	Yes. HMO's can put disproportionate pressure onto local neighbours, parking provision and noise, which can lead to conflict. Maintaining a high quality of HMO's is essential to ensure the safety of the residents therein, as well as neighbouring properties. This should be reflected in policy DM14.	Comments noted. HMOs are a legitimate housing type in urban areas and capable of control through planning policy. Although the Police comments deal with some of the recognised issues the Council's Planning control policies are only able to go as far as current guidance allows in dealing with these social issues. As there have been no other submissions in respect of the policy affecting the sub-division of family dwellings the current policy is considered effective. The general assumption of 30% as the threshold at which the proportion of HMOs in a street may be considered to be a matter of concern will be retained.	25499
		Mersea Homes	Our experience in the IGS demonstrates that viability and pragmatic policy decisions are central to securing delivery. Our policy representations over the last decade have continually sought to ensure that policies have been realistically framed to allow them to be met, rather than being expressed as aspirational and then failing to be upheld. We have consistently argued that policies relating to the proportion of affordable housing to be delivered, and to the sustainability standards to be achieved in new built schemes should be expressed on a realistic basis and consistent with national policy.	Comment noted. The Council aims to produce a plan which has been prepared positively, in a way that is aspirational but deliverable. The Councils policies on affordable housing and sustainable development will be assessed through the local plan review.	25486
		On Behalf of The Kesgrave Covenant	DM1 and DM2 will need review to ensure that they fully meet updated national planning policy guidance DM3 - many LPAs provide flexibility in terms of garden sizes to recognise that the standards can be difficult to achieve on mid terraced plots (7.5 sq. m for a 2 bed mid-terrace unit can produce unhelpfully deep and narrow gardens) and on corner plots, or plots that are well related to adjoining open space. DM30 revisit wording of part (c) in the context of any new residential allocations outside IP One, consider changing 35 dph to provide greater flexibility	Comments noted. The Council intends to review its policies in the context of the new NPPF, 2018 and introduce updates where appropriate.	24881
		Associated British Ports ABP	CS3 - ABP supports the regeneration objectives for the IP-One area. There are, however, important elements of the Port within or adjacent to this area. New development should, therefore, have regard to these existing uses and activities so as to ensure that they are protected. We suggest, therefore, the addition of a new criterion into any new policy based on Policy CS3. "New development should be sensitive to existing uses (including those at the Port of Ipswich) and avoid potential impacts which may prejudice the continued operation and where appropriate, expansion of these uses." CS20 - Policy needs to be updated to reflect progress since the DPD was adopted. ABP asks only that any update has regard to and reflects ABP's concerns that any new transport scheme: 1) avoids an unacceptable impact on existing vessel access to the Wet Dock via the Lock Pit to the detriment of continued port operations and those of our tenants, commercial businesses and the vitality and viability of the Ipswich Haven Marina 2) avoids any adverse impact (e.g. through traffic congestion) on Cliff Road, which is the primary access onto Cliff Quay 3) avoids any adverse impact on the route for port operational vehicles, plant and equipment between Cliff Quay and the Island Site 4) avoids a routing which would affect the existing railroad into the West Bank Terminal 5) does not prevent the Port from meeting the stringent security requirements of the International Ship and Port Facility Security Code, and 6) allows for navigation rights along the New Cut	The Council acknowledges that Ipswich Port is a significant sector in Ipswich and as such the Council is keen to ensure that proposals for new development adjacent to the site do not compromise existing uses and activities.	25081
		On Behalf of East of England Co-operative Society	Boss Hall - We generally support the existing development management Policy DM25 as it provides protection for employment land. However, we also consider that reference should be made to preventing the long term protection of employment land where there is no reasonable prospect of a site being used for that purpose. Prince of Wales Drive - In the context of this question that development management policies relating to areas such as proposals in retail areas are to be amended as a result of more up-to-date evidence in the form of the new Retail and Leisure Study.	Comments noted, however the defined employment areas identified through policy DM25 are currently well used and represent very significant clusters of employers providing job and therefore need to be safeguarded.	25375
		Suffolk Wildlife Trust (Mr James Meyer)	Policy DM4 - could be amended to ensure that all new SUDS are designed to maximise their wildlife value in accordance with published best practice guidance. Policy DM5 and DM6 - could be amended to ensure that the design of new developments secures enhancements for wildlife. Policy DM29 - New sports and recreation facilities can represent significant areas of greenspace, the policy should therefore ensure that such development maximises the biodiversity opportunities of such sites. Policy DM31 - We support this policy, however it may be necessary to update Plan 5 (Ipswich Ecological Network).	Comments noted. The Council agrees that all new development presents an opportunity to make a positive contribution to the natural environment. New housing, SUDS and sports and recreational facilities, can all be designed to integrate space for wildlife.	25017
Suffolk County Council SCC	The County Council would appreciate the opportunity to review Ipswich Borough Council's development management policies with Borough officers, once consideration has been given to the other comments made in respect of the development of this Plan.	Comments noted, further consultation will be carried out on the first draft local plan in due course.	25456		
Northern Fringe Protection Group NPPG	Yes. The DM policies need to take better account of the major air quality issues affecting Ipswich. Air quality must be improved and all AQMAs eradicated. Development should not be permitted if it risks worsening air quality.	Comments noted, the Council's intends to introduce a specific air quality policy to allow it to take account of the impact of air quality when assessing development proposals.	24976		
Save our Country Spaces SOCS	Yes. The DM policies need to take better account of the major air quality issues affecting Ipswich. Air quality must be improved and all AQMAs eradicated. Development should not be permitted if it risks worsening air quality.	Comments noted, the Council's intends to introduce a specific air quality policy to allow it to take account of the impact of air quality when assessing development proposals.	25056		
Suffolk Preservation Society	DM5 only criteria e and f refer to special townscape character and architectural quality-inadequate to deliver high quality design should be more specific and robust. SCDC Design Policy DM21 is a better example. DM34 Countryside - criteria a and g incompatible because a major housing development is unable to respect the character of countryside - defined by low density, sparse housing and open spaces. Fails to specify sequential site selection which supports brownfield before greenfield. Wording of policy fails to include "enhance" when referring to statutory duty with regard to the AONB in line with S85 of CROW Act.	Comments noted. The new NPPF includes an expanded design section, which emphasises that good design is fundamental to the planning process. This re-focusing of national policy, will be reflected in the revised Local Plan.	24704		
Historic England HE	All policies should be reviewed through this process and consideration of the historic environment given throughout the plan from a positive strategy. Please read this answer alongside our other answers to this consultation, especially Q84. We highlight these particular policies for consideration on how they can be improved: CS4, DM5, DM6, DM8, DM9, DM30. This review is an opportunity to refine the approach to the Waterfront area. The current structure of the IP-One Opportunity Areas and the site allocations has not provided the clarity and vision required or adequately set out the complex historic environment considerations in this area.	The Council is committed to protecting and enhancing the Borough's heritage assets and intends to review its historic environment policy as part of the Local Plan review.	24917		
On behalf of RSPB	Policy DM6 - Additional line k) to incorporate integrated swift-bricks Policy DM10 - Re-word as Protection and Enhancement of trees and hedgerows Policy DM28 - We question the tone of this policy. NPPF sets out that open spaces should be protected and enhanced. Policy DM31 - needs to include SPAs and SSSIs	The Council is committed to supporting the local wildlife population, promoting increased canopy cover and protecting open spaces and the natural environment. As such the Council will review policies DM6, DM10, DM28 and DM31 and make amendments where appropriate.	24740		

	On Behalf of EDF Energy	Regarding policy CS2, we propose that new development should also be encouraged within sustainable areas and there should be a preference for development on brownfield land. With regard to density, there should also be some flexibility with the application of density standards, depending on the character of the area and accessibility levels. In certain situations outside of the town centre, it may be possible to achieve higher densities and each site should be assessed on a site specific basis. This approach is consistent with the NPPF (paragraph 17), which encourages effective use of land. Policy CS12 - We support the Council's approach in that the Council recognises that where it is difficult to meet the target for affordable housing provision, a lower amount of affordable housing or different tenure mix could be provided on a site, subject to viability testing in accordance with the NPPF. However, the policy does not provide for off-site affordable housing or commuted payments in lieu of on-site provision. It would be helpful to provide these alternative arrangements within the policy, especially where viability assessments support this approach as a preferred option. Policy CS9 seeks to focus on brownfield land first whilst recognising that greenfield land will need to be developed to meet the Boroughs housing need and forecasted job growth. This policy has been deleted. We therefore request that this policy be included as part of the emerging Local Plan as there is a priority to build on previously developed land, in line with paragraph 17 of the NPPF.	The Council agrees that there should be a preference for development on brownfield land. The approach to the location of development in policy CS2 maximises opportunities to re-use previously developed land within central Ipswich which reflects the sequential approach to site selection required through the NPPF. The Council will consider clarifying this requirement as part of the Local Plan review. Policy CS12 advises that 'the presumption in favour of on-site provision rather than the payment of commuted sums in lieu of provision'. Again, the Council will consider whether this requires clarification as part of the Local Plan review. The requirements in deleted policy CS9, continue to be expressed through CS2.	25070	
	Q35: Are there new development issues which may warrant the inclusion of new development management policies in the plan? If so, what are they, and what would the policies need to do?	Associated British Ports ABP	New Local Plan would benefit from the inclusion of a new policy which: - Identifies the operational Port estate and its relationship to the town centre and IP-One area - Supports port development and the growth of the port where this does not conflict with other policies in the Plan; and - addresses the particular development considerations which should apply in the interface area between the port estate and the town centre and IP-One areas. Such a policy would address the imprecision and lack of clarity of the current draft version of the DPD. Whilst Policy DM25 serves to safeguard existing employment areas, it is important that care is exercised when development proposals are brought forward in the vicinity of these areas (consistent, perhaps, with other policies of the DPD) to ensure that this new development does not prejudice existing employment uses and business operations which are "appropriately located". ABP requests, therefore, recognition in the new Local Plan that it will not apply policies in isolation in exercising its development control functions.	Presently DM25 advises that 'it is important to ensure that proposals for new development that would itself be sensitive to the harmful effects of air, noise, vibration or light pollution, are not located where there are or could be such problems'. The Council will consider whether this point requires clarification during the Local Plan review.	25080
		The Theatres Trust	Policies should protect, support and enhance cultural facilities and activities, particularly those which might otherwise be traded in for more commercially lucrative developments. The Trust recommends a policy along the lines of - Development of new cultural and community facilities will be supported and should enhance the well-being of the local community, and the vitality and viability of centres. Major developments are required to incorporate, where practicable, opportunities for cultural activity to widen public access to art and culture, including through the interpretation of the heritage of the site and area. The loss or change of use of existing cultural and community facilities will be resisted unless: * replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or * it has been demonstrated that there is no longer a community need for the facility or demand for another community use on site.	The value of the cultural facilities in helping to create a sense of place and community is understood. The Council currently promotes culture and leisure facilities through policy CS14 (retail, office, leisure, arts, culture and tourism). The Council will consider whether a dedicated policy is required as part of the Local Plan review.	25000
		Historic England HE	Consideration of streetscape, particularly given the issues of connectivity and traffic management is an area for exploration. For streetscape improvements, refer to the Streets for All publications which are currently out for consultation: https://historicengland.org.uk/images-books/publications/streets-for-all/ . They provide updated practical advice for anyone planning or implementing highways and other public realm works in sensitive historic locations. It sets out means to improve public spaces without harming their valued character, including specific recommendations for works to surfaces, street furniture, new equipment, traffic management infrastructure and environmental improvements. Please also see our advice for highways engineers and designers: https://historicengland.org.uk/advice/caring-for-heritage/streets-for-all/highway-engineers-and-designers/ .	Comment noted, the Council currently considers the public realm and street scene through policy DM5 (Design and Character) and its Space and Design Guidance SPD. The Council will consider whether a dedicated policy is required.	24937
		Suffolk Constabulary	*Policy DM1: Sustainable development. *Policy DM3: Provision of Private Outdoor Amenity Space in New and Existing Developments. *Policy DM5: Design and Character *Policy DM5 paragraph 9.46. *Policy DM5: Heritage Assets and Conservation: *Policy DM12: Extensions to Dwelling Houses and the Provision of Ancillary Buildings *Policy DM14: The Subdivision of Family Dwellings. *Policy DM17 Transport and Access in New Developments. *Policy DM18: Car and Cycle Parking. *Policies DM20 - 23 Shopping centres. *Policy DM29: Provision of New Open Spaces, Sport and Recreation Facilities. *Policy DM32: Protection and Provision of Community Facilities.	The Council will review all development management policies as part of the local plan review.	24849
Potential Land for Development	Q36: Are there suitable sites which are currently located in employment areas, which we could re-allocate to housing without compromising the remainder of the employment area? (Refers to current employment areas map).	On Behalf of The Kesgrave Covenant	Given that employment land allocations have only recently been reviewed in the context of the Ipswich Local Plan, and given also that there is a clear requirement for protecting viable employment land, the scope to re-allocate existing employment land for residential purposes will be limited at best (see response to Question 19 under Part A).	review of employment land to be undertaken.	24882
		Associated British Ports ABP	The majority of the operational area of the Port of Ipswich is identified in Employment Areas E9 and E12. Within and surrounding these areas there may be sites which are suitable for other alternative uses and redevelopment (eg for housing). ABP is concerned that any development proposals that may be brought forward in these circumstances are sympathetic to port operations, particularly in respect of the juxtaposition and orientation of new development to ongoing port activity and the potential traffic impacts that this new development may have on already constrained access routes into and around the Port.	The Council is considering all sites and their suitability through the SHELAA, including areas around Cliff Quay and Holywells Road. These sites will only be allocated for housing where they are compatible with neighbouring uses.	25084
		On Behalf of East of England Co-operative Society	The Boss Hall Industrial Estate is currently allocated as an employment site (E4) and protected under Policy DM25, where it is safeguarded for employment and ancillary uses. The Society is currently preparing a redevelopment/re-use scheme for a package of proposed uses that would provide further employment opportunities (including a variety of smaller B1/B2 units) and an appropriate range of compatible retail and leisure uses on this part of the industrial estate to enhance the current provision and provide additional services for the existing businesses.	Comments noted - planning applications will be determined on the bases of the adopted local plan.	25377
		Suffolk Wildlife Trust	Whilst we do not have any recommendations for employment sites that could be re-allocated to residential use, it should be noted that employment site E15 includes Ransomes Europark Heathland CWS. Consideration of any use types in this area must ensure that the CWS is secured and suitably protected.	Comments noted	25018
		Private individual	Again I refer to this apparent lack of land within Ipswich's boundary. E14/E17 could have been an ideal location for residential development, however it was used as a low job car sales area. Why? Land either side of West End Road needs to be improved visually (sorry I cannot locate it on the map) the old Marshall Jag site should be used for residential and the tatty car scrap yard as well (on other side of the road). E12 should not be retained. E15 should be retained at all costs as I believe this is a well supported employment zone.	The Council is always considering re-development in relevant areas and West End Road is an area which will be explored through the SHELAA as well as any other redundant employment areas.	24662
		On behalf of FIS Property and Landex Limited	There are suitable sites which are currently located in employment areas which could be re-allocated to housing. One such site is the land at 17-19 Holywells Road, Ipswich (plan uploaded) owned by FIS Property Limited and Landex Limited, within Employment Area 11 (Holywells Close and Holywells Road). The site is currently in use but not used efficiently, having regard to its highly sustainable location within IP-One between the Wet Dock and Holywells Park. It provides an excellent opportunity for redevelopment/part redevelopment to provide both residential and employment development, e.g. commercial employment space at ground floor level with residential above. It can be redeveloped without compromising or being compromised by the remainder of the employment area.	Comments noted and the site referred to will be considered as a potential proposed housing allocation in the new local plan.	24875
		Pigeon Investment Management Ltd	With a high jobs target a wide variety of employment land is needed to provide flexibility in the employment land market. The requirements of businesses vary significantly and to meet the jobs target an over provision of employment land is required. This approach was found sound in the recent local plan examination in the Borough.	The Council is committed to protecting employment sites and employment areas across the town to meet a variety of needs.	25368
		Conservative Group (Clr)	Areas 10, 11 & 12 could be considered for housing.	A review of employment land and housing allocations will be undertaken as part of the preferred options local plan, which will seek to deliver adequate land for both uses, which meets then need of Ipswich.	25299
	Q37: Land is allocated in the Borough as countryside. Should we re-allocate countryside sites to housing? If not, why not? If yes, which areas? (See map below for details of current countryside areas).	On Behalf of The Kesgrave Covenant	Yes, in accordance with our responses to Part A (and in particular Question 13), suitable development sites on the edge of Ipswich should be re-allocated for residential development - specifically the areas shown as H, I and J on the plan showing accompanying Question 37.	A review of the peripheral land of Ipswich will be undertaken and if there are appropriate sites for housing these will be allocated in the preferred options local plan.	24883
		Suffolk Wildlife Trust	We would object to the allocation of greenspaces for new development. As recognised by the council, such areas are essential for the health and wellbeing of residents, the town's biodiversity and wildlife network, climate change mitigation and adaptation and to create an attractive environment. An integrated, landscape scale approach is key to conserving wildlife, even where it is demonstrated that a site is of no ecological value in its own right, it may contribute to the green infrastructure of the area as part of a network.	In the event of allocation the Council would expect to maintain the green rim and routes for wildlife by introducing planning constraints that cover access, cycling and walking and retention of open space for the purposes of residents wellbeing.	25005
		Suffolk County Council SCC	Access to the natural environment and open space improves health and wellbeing by providing opportunities for physical activity, being beneficial to mental health and reducing health inequalities. If IBC does choose to re-allocate open space for housing, the need for people to access the outdoors should still be met. For all sites indicated in the plan, development proposals would need to be considered in relation to policies relating to archaeology. Factors to consider may be that for A, 3 skeletons were found in 1912, which may have implications for development, Sites M, N and O are in areas of cropmarks relating to historic settlement.	Comments noted - the local plan will include policies making reference to the importance of protecting the historic environment. The Council has adopted a specific development and archaeology SPD.	25455
		Northern Fringe Protection Group NPPG	No. It is not realistic to release areas of protected open spaces within the Borough to residential development, given the current large shortfalls of Open Space in Ipswich. Continuing protection of the Ipswich recreational and wildlife corridor 'green rim' around the town based on the earlier Haven Gateway Green Infrastructure Strategy is required. We strongly oppose any attempt to use what little remaining countryside there is in the Borough for homes, especially as neighbouring authorities are using up their countryside adjacent to Ipswich Borough boundaries to deliver large amounts of homes.	Concerns noted. Please see comments above relating to the goals for the green rim and connecting corridor that would need to be maintained in the event of allocation.	24977
		Save our Country Spaces SOCS	No. It is not realistic to release areas of protected open spaces within the Borough to residential development, given the current large shortfalls of Open Space in Ipswich. Continuing protection of the Ipswich recreational and wildlife corridor 'green rim' around the town based on the earlier Haven Gateway Green Infrastructure Strategy is required. We strongly oppose any attempt to use what little remaining countryside there is in the Borough for homes, especially as neighbouring authorities are using up their countryside adjacent to Ipswich Borough boundaries to deliver large amounts of homes.	Concerns noted - please see other comments above	25055
		Greenways Countryside Project	As a general principle, all of these existing 'countryside' areas form part of the 'green rim' concept, providing much needed breathing space between settlements - both for people and wildlife. Comments made on each site, see attached document.	Comments noted.	25346
		Rushmere St Andrew Parish Council	Rushmere St Andrew Parish Council consider the areas annotated H, I, J, K & L should remain as countryside in order to preserve the very long standing (1997) policy of maintaining the separation of RSA village from the town in order to maintain its own identity. We are concerned about additional traffic that would be generated around the north Ipswich to Marlesham rail run corridor (Humber Doucy Lane, The Street, Playford Road) that would be generated by any further development in the north/north-east corner of Ipswich.	Comments and concerns noted.	24886

	On behalf of RSPB	No. Any proposal to reallocate countryside as housing, will first need to map the presence of any priority habitats and species. Mitigation for certain farmland bird species, e.g. skylark is likely to be impractical within developments so will need to be secured off-site.	Practical points noted and welcomed	24649	
	Private individual	Again apparent lack of land in Ipswich? Agree P/O/N/M should not be developed as it is the other side of the A14/A12 and would be an odd fit with the town. I can think of no sane reason why E/F/G and H through to L shouldn't be developed especially given the shortage of land in Ipswich. C looks appropriate if the current gypsy site is kept as it is.	Comments noted	24663	
	Ministry of Defence MOD	Parcels A to D fall within the 91.4m height consultation zone surrounding Wattisham airfield; any proposed structures in these areas which may exceed 91.4m need to be reviewed by this office. Parcels E to G fall within the 91.4m height and birdstrike consultation zones; any proposed structures in these areas which may exceed 91.4m or include the development of open water bodies or wetland habitat, refuse and landfill sites need to be reviewed by this office. Parcels H to R are all Sites outside our Safeguarding Areas (SOSA). The MOD has no statutory safeguarding concerns with development within these locations.	Planning constraints noted, and applications which are submitted relating to the zone will be appropriately consulted on.	24817	
	Ipswich Wildlife Group IWG	The existing countryside areas form a green buffer between settlements, providing welcome areas of exercise and relaxation for residents and valuable habitat for wildlife. A - A small-scale development that included habitat for reptiles and other wildlife could be part of the desired green rim. B - This area alongside the A14 main wildlife corridor is woodland, therefore unsuitable. C - This area is also in the A14 wildlife corridor and would need a habitat survey to identify existing wildlife value before any development could be considered. D - This is a small area of an arable field - not feasible on its own. E and F - Wildlife and habitat surveys would be needed to establish the value of the site. The site is located in the green rim and a major wildlife corridor, so any development should enhance wildlife value and create new semi-natural open space as part of the green rim (with links to the new Garden Suburb country park). G - This site requires wildlife and habitat surveys. It would be the most suitable extension to the new Garden Suburb country park. H to L - The hedgerows on this site should be protected. Small-scale development should include a semi-natural open space as part of the green rim.	Practical points noted and welcomed, please see comments above	24825	
	Pigeon Investment Management Ltd	The remaining areas of countryside are difficult to develop and will not deliver significant housing. The Inspector who examined the adopted Local Plan amended policy DM31 to ensure that proposals for the development of the remaining unallocated countryside around the town would be looked on favourably. Despite making this change to the plan the Inspector still concluded that there was not sufficient land within the Borough boundary to deliver significantly more than the Boroughs interim housing target of 9,777 homes to 2031.	Comments noted. A review of peripheral sites will be undertaken, particularly having regards to whether piecemeal or comprehensive development would be a better option for delivery of housing on appropriate sites.	25369	
	Ipswich Limited	Land identified as countryside and open space should remain as is.	Comments noted - given the limited land within Ipswich and the need to deliver housing the peripheral sites will be reviewed.	25410	
	Conservative Group	E, F & G could be considered for housing.	Comments noted	25300	
Q38: Land is identified as open space. Should we re-allocate some open space sites to housing? If not, why not? If yes, which ones? (Refers to Areas of Open Space within Ipswich map).	On Behalf of The Kesgrave Covenant	As a general principle, existing land that has open space value or recreational value should be retained for that purpose. The Council will no doubt review its evidence on existing levels of provision to determine whether or not there are any genuine areas of surplus, but clearly new housing should not be provided at the expense of maintaining reasonable access to open space for existing residents. There is a small area of land at the north-eastern side of the area referenced 35 (fronting on to Humber Doucy Lane) which is not part of the playing fields, is private land, and has no current or historic recreational function, which should be removed from the open space allocation (details will be provided separately).	The site preferred will be considered for residential development through the Strategic Housing and Employment Land Availability Assessment (SHELAA).	24884	
	Suffolk Wildlife Trust	We object to the re-allocation of open space for housing. The loss of such sites to development would not only result in local biodiversity losses, but would also decrease connectivity and fragment the network of greenspaces throughout the town. The 2012/13 Ipswich Wildlife Audit identified the ecological value of the majority of the greenspaces within the town and provides a good evidence base for the value of these sites. In addition it could significantly increase visitor pressure on other sensitive designated sites, such as the Stour and Orwell Estuaries, by displacing people from the areas they currently use for recreation.	The Council through the Local Plan has committed to put in place measures to manage recreational pressures on the Orwell Estuary.	25006	
	Suffolk County Council SCC	Access to the natural environment and open space improves health and wellbeing by providing opportunities for physical activity, being beneficial to mental health and reducing health inequalities. Ipswich Borough Council should ensure that if it does choose to re-allocate open space for housing that the need for people to access the outdoors is still met, so that the benefits to health are available to everyone.	Comments noted. The Council recognises that green spaces contribute towards local biodiversity, visual amenity and health and well-being.	25442	
	Northern Fringe Protection Group NFPG	No. There is already a deficit of Open Space across Ipswich and it should not be allowed to deteriorate further. It is worth noting that with the proposed growth under the current Local Plan, the demand for Open Space per head of population will increase further.	The Council recognises that there is a deficit of Open Space in certain areas of the Borough and this has been identified through the Open Space SPD.	24978	
	Save our Country Spaces SOCS	No. There is already a deficit of Open Space across Ipswich and it should not be allowed to deteriorate further. It is worth noting that with the proposed growth under the current Local Plan, the demand for Open Space per head of population will increase further.	The Council recognises that there is a deficit of Open Space in certain areas of the Borough and this has been identified through the Open Space SPD.	25054	
	Greenways Countryside Project	Strongly oppose re-allocation of existing limited open space, allotments etc because of their public and wildlife benefit. Playing fields, if not required for that purpose should be considered for change to wildlife open space to meet increasing needs, especially where located in or near to the ecological network.	The Council comments that Open Space which is not being utilised will always be considered for re-use including for wildlife purposes and this is explored through the allocations process. Notwithstanding this, the Council recognises that green spaces contribute towards health and well-being and is working to protect its existing open spaces, where appropriate, through policy DM28 and provide new open spaces through policy DM2.	25347	
	On behalf of RSPB	The RSPB considers that open space should not be re-allocated to housing. For all ages, 'access to green spaces is associated with better mental and physical health across socioeconomic groups', (Healthy lives, healthy people: our strategy for public health in England' - Dept. Health White Paper, November 2010; paragraph #3.26) We commend the Council and its partners for mapping the Ipswich Wildlife Network and endorse that Core Strategy policy DM31 sets out that development proposals will be required to have regard to existing habitat features and the wildlife corridor function, through their design and layout, and achieve net biodiversity gains.	Comments noted but some Open Space will need to be explored through the SHELAA for it's suitable for housing development. Notwithstanding this, the Council recognise that green spaces contribute towards health and well being and is working to protect its existing open spaces, where appropriate, through policy DM28 and provide new open spaces through policy DM2.	24678	
	Ministry of Defence MOD	Open spaces on the western half of the town fall into the Wattisham station Safeguarding zone aerodrome height 91.4m. 9-11, 16, 18-28, 46-54, 57 and 58. The MOD would require consultation for any proposed developments within these zones which may exceed 91.4m in height. Areas on the western half of the town fall into the Wattisham station Safeguarding zones aerodrome height 91.4m and Birdstrike: 1-8, 12-15 and 17. The MOD would require consultation for any proposed developments within these zones which may exceed 91.4m in height or include the development of open water bodies/wetland habitat, refuse and landfill sites.	The Council will consult the MOD on any proposals for tall buildings within the identified safeguarding zones.	24818	
	Ipswich Wildlife Group IWG	Strongly against re-allocation of existing open space, due to the benefits they provide for public and wildlife.	Comments noted. The Council is committed to protecting existing open space and the natural environment through policies DM26, DM29 and DM31.	24826	
	private individual	Open spaces should not be allocated for housing otherwise the character of the townscape will become one long continuous belt of residential building. The townscape needs to be dissimilar through breaking up areas with mixtures of uses and retention of open spaces.	The importance of well-designed residential development is noted and will be encouraged through the Core Strategy to include protection and provision of Open Spaces.	24777	
	Environment Agency	If open space sites are to be reallocated to housing, it is vital that the social, environmental and economic value is not lost. Instead, new housing development can be used as an opportunity to make local areas of open space more accessible. A network of sites is preferable for urban biodiversity, and any reduction will put additional pressure on sites that are more sensitive to recreational disturbance such as the Orwell Estuary SSSI.	Comments noted. The Council is committed to protecting existing open space and the natural environment through policies DM28, DM29 and DM31. Through policy DM29 the Council will ensure that public open spaces are provided through new developments to meet the needs of their occupiers and opportunities will be sought to link green spaces into a more continuous network.	25178	
	Pigeon Investment Management Ltd	To change land such as parks, sports pitches and allotments to housing should be resisted. As the population grows, the facilities and open space have to grow as well. Reducing the levels of facilities and open space while growing the population places strain on existing facilities. The National Planning Policy Framework emphasises the importance of such facilities in section 8 "promoting health communities."	The Council is committed to protecting existing open space, sports and recreational facilities through policy DM26. Open spaces and sports and recreational facilities are essential to the quality of life of Ipswich people and the quality of the town's environment. The Council will aim to ensure that public open spaces and sports facilities are provided through new developments to meet the needs of future occupiers through policy DM29.	25370	
	Ipswich Limited	Land identified as countryside and open space should remain as is.	Comments noted. Ipswich is set within a high quality landscape which is protected through policy DM34 (Countryside).	25411	
Q39: Are there other sites in the Borough that you consider would be suitable and available for housing or other development? Please provide details. Please note, sites submitted through the call for sites exercise do not need to be re-submitted.	Historic England HE	Site allocations: Historic England advocates a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. At an early stage when assessing site allocations it is important to include the impact on heritage assets. See advice note 3. If a site is allocated, we would expect to see reference to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting.	The Council with safeguard existing heritage assets through Policy DM8 and understands the importance of considering the protection of heritage assets through new site allocations.	24916	
	Private individual	Not in a place to comment on the majority of the sites. The main parks in Ipswich should be kept at all costs (Christchurch, Holywells, Landseer). Murrayfield Park should be kept as this is an important area for dog walking without this area this would make dog walkers take their dogs to Landseer Park where they have been a number of dog attacks and a huge amount of litter. Without Murrayfield Park we would drive to a safe park or field which would have impacts on traffic/pollution etc.	Protected Parks and Gardens are generally not considered appropriate for re-allocation.	24664	
	Ipswich Central	The number of residents living in the town centre has increased, but nowhere near enough. The Plan must help to stimulate new residential development, particularly that differentiated from the high number of apartments currently in existence. Town housing developments throughout the Eastgate and Westgate Quarters should be encouraged.	The Council is considering all forms of development in the IP-One area, including Town Houses which could be built in conjunction with flats to meet the 90dph requirement of Policy DM30.	25089	
	On Behalf of EDF Energy	Land at Cliff Quay is allocated for employment use under Policy SPS (Ref. IP067). In earlier versions of the Site Allocations DPD, IBC put the site forward for a similar form of development and for 50% housing at low density (50 dwellings) and 50% employment. It would be possible to accommodate housing to the north of the site adjoining the existing residential land uses and to provide employment land further to the south adjacent to the employment uses with a buffer zone in the middle. We request that the proposal should be amended to include residential development alongside employment uses.	Comments noted and this area has been explored as part of the SHELAA.	25075	
	On Behalf of Bloor Homes	Land at and surrounding Hill Farm, Lamberts Lane, Rushmere St Andrew (The Site) is being considered as a potential development site by Suffolk Coastal District Council as part of its emerging Local Plan, and has been assessed through the Initial Sustainability Appraisal - Site Assessments as site reference 1087.	The Council will work with neighbouring authorities where appropriate and where it has been identified that development could be secured through a cross-boundary arrangement.	25225	
Central Ipswich	Q40: For planning purposes, should we continue with the IP-One approach or align with the	Associated British Ports ABP	ABP has no particular view on whether a continuation of the IP-One approach or alignment with the Ipswich Vision 'quarters' is preferable for planning purposes. ABP would only request that, whichever the approach adopted, the policy approach reflects the matters raised by ABP.	Comments noted.	25085

		Suffolk County Council SCC	Along with the Borough Council and others, the County Council is a strong supporter of the Ipswich Vision. The County Council welcomes the consideration being given to a better alignment between the Ipswich Vision quarters and the zones identified in the Plan.	Support of Ipswich Vision noted.	25454
		Historic England HE	The multiple layers of the Ipswich Vision, IP-One areas, and site allocations do not provide a clear strategic direction for central Ipswich. Refinement of approach to provide clarity is essential. This clarity should include consideration of the need to conserve and enhance the historic environment. This is most apparent in the connectivity between the town centre and the Waterfront, which involves a number of designated heritage assets and their settings. We would recommend a review of the Central and Wet Dock conservation area appraisals and their boundaries as part of the evidence base for the new local plan.	Concern regarding lack of clear strategic direction noted. Lack of reference to conservation and enhancement of the historic environment noted, particularly in relation to the waterfront and town centre. Opportunities to review the conservation area appraisals and their boundaries will be explored in the future.	24938
		Suffolk Chamber of Commerce	If economic and business growth is to occur we believe that the focus on central Ipswich should be extended, especially westward to include Norwich Road as a key gateway to the town north to south, although we support the overriding aim of re-aligning the key routes through the town north to south to strengthen the links between the town centre and the Waterfront. In order to simplify, and provide a clearer statement of intent for, future developments the 'quarters' defined and described under IP-One and Ipswich Vision should be made consistent and probably rationalised.	Options to amend the town centre boundary to include wider areas, such as Norwich Road, will be considered where appropriate. Suggestion to opt for a 'quarters' approach to align IP-One and Ipswich Vision acknowledged.	25158
		Private individual	Some praise should be given to the improved retail offering in Ipswich over recent years with key retailers coming in and an improved Buttermarket. However there is still a long way to be a truly ambitious town rather than settling for 'it'll do'. I don't really see the need for the different quarters apart from town-centre planning policies, promoting development around the waterfront and seeking national well-paid employers move around Portman Road/Civic Drive area of town.	Opposition to quarters noted. Support for development around the waterfront and Portman Road/Civic Drive area acknowledged.	24665
		Ipswich Central	Ipswich Vision 'quarters' definitions should be adopted for planning purposes. The Vision Board should be tasked with assisting with master planning of the Quarters in order that they develop a unique character. Alternative uses should be encouraged within the Eastgate and Westgate Quarters and core retail investment should be concentrated within the Central Quarter, together with a more independent offering within the Saints Quarter. Several buildings/areas within the Central Quarter could be redeveloped to suit modern retail demand for example Upper Brook Street and to bring new occupiers to previously underused sites.	Support of Ipswich Vision Quarters noted. IBC will consult and engage with The Vision Board where appropriate. Recommendation of allowing alternative uses within the Eastgate and Westgate Quarters noted and will be explored as part of review of relevant Local Plan policies.	25088
		Gladman Developments	Gladman note that consideration is being given to the future policy focus for the regeneration of central Ipswich and that reference are made within the consultation document to the approaches contained within 'IP-One' and the 'Ipswich Vision'. Any policy approach of this nature should avoid being overly prescriptive and instead seek to provide a suitably broad framework within which development opportunities can be brought forward over the plan period that can positively respond to prevailing market conditions to secure the development needed to support regeneration.	Concerns regarding potential narrow-approach to policy and need for broader framework acknowledged. IBC recognises the need to respond to market conditions in supporting regeneration and this will be taken into account in the Local Plan Review.	25387
		New Anglia LEP for Norfolk and Suffolk	New Anglia LEP is committed to the Ipswich Vision and will continue to support the evolution and implementation of the Vision. Through better alignment with the Ipswich Vision, the Local Plan could add significant value to efforts to revitalise Ipswich Town Centre, but it is recognised that the Ipswich Vision and the Local Plan approach the issues in different ways. In developing the Local Plan, the Borough Council should consider how far planning policies and allocations can contribute to the coordination of investment in Ipswich Town Centre, through the Ipswich Vision.	The need for the Local Plan and Ipswich Vision to align, so as to contribute to the coordination of investment in Ipswich Town Centre, is recognised and IBC will work with Ipswich Vision in reviewing relevant Local Plan policies.	25228
		Ipswich Limited	These quarters are by Ipswich Central - not Ipswich Vision. The policy isn't appropriate because the contents do not remain constant. The goalposts are constantly being changed and there is no consistency or clear vision. There is also too much attempted copycat with disastrous effects. Maybe we should focus on something a bit more bespoke to Ipswich.	Concerns regarding quarters acknowledged. The Local Plan review will explore bespoke opportunities, as well as adaptations of existing visions for the IP-one area, to determine the best course of action.	25412
Housing mix, affordability and Density	Q41: Should the Local Plan continue to insist on a mix of dwelling sizes and types on each individual site or aim to ensure that we end up with a mix overall, across all development sites in the Borough?	Mersea Homes	We believe that housing mix should be not only driven by housing need, but by the context of the site being delivered. The Council's policies, have in the past, and in our view, offered uncertainty because of their approach of seeking to both determine mix and provide exemptions - the result of which is ambiguous policy. In our view, the context of the site should primarily lead the dwelling mix, with tenure mix and dwelling sizes for affordable provision then set within that context.	Concerns regarding the lack of clarity of existing policies in relation to housing mix noted. Support for a site-led approach to determining housing mix noted.	25487
		On Behalf of The Kesgrave Covenant	There is merit in seeking a mix of unit sizes in all developments, to help contribute to the overall achievement of a balanced housing stock, but it also makes sense to be realistic about what type of mix is most appropriate for individual sites, rather than seeking the same mix from all sites. In addition, there is often a mismatch between the mix of housing that SHMAs indicate might be needed, compared to the mix that the housing market demands. Trying to follow SHMA recommendations without flexibility can therefore have an impact on development viability.	Interpretation of a broad approach to housing mix as being overly rigid acknowledged.	24885
		On Behalf of East of England Co-operative Society	Prince of Wales Drive - We consider that the Local Plan should not necessarily continue to insist on a mix of dwellings sizes and types on each individual site. Housing mix should broadly accord with the most recently published SHMA, the critical element being to ensure that the overall provision across all sites accords with identified needs for the Borough. Different sites will be suited to varied forms of provision, having regard to surrounding and site-specific context, in addition to viability considerations. The Local Plan should refer to the need for ensuring that developments are viable.	Support for broad approach to application of housing mix policy noted. The need for ensuring that developments are viable and suitability of sites to certain housing types acknowledged.	25378
		Northern Fringe Protection Group NFFG	In general, the Local Plan should continue to insist on a mix of dwelling sizes and types on each individual site, although some flexibility would appear sensible.	Support for continued approach with further flexibility noted.	24979
		Suffolk Chamber of Commerce	We have no specific comments here, other than that the Plan will need to make adequate and appropriate provision for the required mix of housing given the overall projected population and employment growth. The policies in this Plan should be flexible, aiming to incentivise residential developments that integrates well with existing communities and results in mixed and balanced communities. While it may be appropriate to have a mix of house types and sizes on individual schemes, this should be aimed at providing balance within the wider community, seeking to match local housing needs and demands. We recommend that the policies developed for this plan balances these needs.	Comments noted. Housing policies will require an appropriate mix of housing to meet the identified need of Ipswich. Comments noted. The Review of the Local Plan will consider the balance of the needs and plan accordingly.	25159 24802
		On behalf of Rentplus	I am strongly in favour of a mix of dwelling sizes and types on each individual site.	Support for continued site-based approach noted.	24850
		Private individual	A mixture of dwelling sizes on individual sites appears to be the 'norm' and should be encouraged.	See above.	24727
		Private individual	A mixture of dwelling sizes on individual sites appears to be the 'norm' and should be encouraged.	See above.	24778
		Conservative Group	No, the Local Plan should not continue to insist on a mix of dwellings types on each individual site. The Conservative Group prefers the option of an overall mix rather than a case by case basis.	Support for overall mix method noted.	25301
				On Behalf of The Kesgrave Covenant	No, employment sites should be retained for employment purposes (as per our previous responses on this matter). In addition, it would be inappropriate to separate out starter homes from other residential areas, and it is better that these are provided as part of the overall mix of housing on residential sites.
		On behalf of Rentplus	The Government intends to widen the definition of affordable housing to encourage a greater diversity of housing to be delivered across England to meet a full range of needs. Starter homes continue to form part of this mix, but is also to be read as a small part of a larger array of tenures, including rent to buy. Members of the Government have indicated that the next iteration of the NPPF (expected in early 2019) is to include rent to buy. This, and starter homes, should be considered as part of the response to meeting local housing needs.	Comments noted, the Council is committed to meeting its identified local housing need and provide decent homes for all.	24803
		Private individual	Starter homes are to be commended but allowing an exception on employment areas surely negates the purpose of a local plan as a tool for planning both for housing and employment. If we nibble away employment sites, why not build on golf courses and parks as well?	Comments noted, the Council is committed to balancing the needs for both commercial and residential property.	24779
		Mersea Homes	We have consistently argued that affordable housing targets within the Ipswich administrative area have failed to reflect the viability of development. Whilst negotiations are ongoing and discussions not fully resolved, it is clear that the target level of affordable housing will not be achieved within the IGS, at least within initial phases. The Council's own monitoring indicates that targets have not been achieved, other than where the Council's own scheme have delivered 100% affordable housing. Our view remains that the Council's affordable housing targets remain unrealistic and should be set at a lower, achievable, level.	Concerns regarding affordable housing level and suggestion for a lower level noted.	25488
		On Behalf of The Kesgrave Covenant	As per our responses on Part A, the Council may wish to consider whether or not additional strategic allocations on the edge of Ipswich offer a more effective and viable way of delivering affordable housing, and hence as it did with the Northern Fringe, seek a higher proportion of affordable housing on such sites compared to smaller urban sites. The ability of strategic sites to deliver affordable housing more effectively is a factor that supports the allocation of such land on the fringes of Ipswich, to help meet locally arising affordable housing needs.	Suggestion of concentrating affordable housing on strategic edge of Ipswich sites rather than smaller urban sites acknowledged.	24888
		On behalf of Rentplus	Many households cannot access traditional affordable housing, are trapped in expensive private rented accommodation, and cannot save towards a mortgage deposit. Under rent to buy households save for a deposit while paying an affordable rent, and then purchase the same house. Rentplus gifts a 10% deposit. It removes the need for households to move and frees up social/affordable rented housing for those with greater priority needs. The inclusion of a wider choice of affordable housing tenures can assist wider delivery and should be sought in a new affordable housing policy to assist more families into housing that meets their needs.	Recommendation of a wider choice of affordable housing tenures in affordable housing policy acknowledged and will be considered as part of Local Plan review process.	24804
		Conservative Group	The threshold for affordable housing in private market developments should be flexible dependant on the nature of the development and should be negotiated with the developers. totally dependent on the scheme. the winerack building is going to be almost totally funded by public money, and because of this there should be no reason for the developer to skimp on affordable housing. if there are very important sites that have a great impact on tourism for example then a reduction in affordable housing should be looked at.	Support for a flexible approach to the affordable housing threshold noted and will be considered in reviewing relevant Local Plan policies. Comments in relation to affordable housing and varying circumstances noted.	25302 24666
		Private individual	In establishing the appropriate housing mix and level of affordable housing provision, viability and housing needs are a primary concern. We are concerned about question 44: it is impossible to consider mix without viability and the Council can only make a decision based on the evidence it collects. Policies on housing mix, affordability and density must provide certainty about expectations and also a degree of flexibility. When testing plan viability, it is not possible to test all development scenarios. There must be flexibility within the policy to recognise that some development will be made unviable by the Local Plan policies.	Concerns regarding viability and the need for flexibility to be applied acknowledged and will be considered in reviewing relevant Local Plan policies.	25033
		Home Builders Federation HBF	To speed up the developments this must be considered on a case by case basis.	Comments noted.	25303
		Conservative Group	We are fairly disgusted that the west meadows site will be terminated. Lets face it - it is a fairly bleak site anyway - under pylons - who else would want it - at least it was somewhere - it is a contentious subject at best - why not support it to have better infrastructure and services?	The West Meadows site is an allocated site for Gypsy and Traveller needs in the current Local Plan. The ownership of this site is outside the control of IBC. IBC will need to plan for appropriate provision of Gypsy and Traveller pitches. The Council remains committed to meeting the need for permanent pitches, as identified through the Gypsy, Traveller, Travelling Show people and Boat Dwellers Accommodation Needs Assessment 2017.	25467
		Ipswich Community Media	Well, we are fairly disgusted that the west meadows site will be terminated. Lets face it - it is a fairly bleak site anyway - under pylons - who else would want it - at least it was somewhere - it is a contentious subject at best - why not support it to have better infrastructure and services?	The West Meadows site is an allocated site for Gypsy and Traveller needs in the current Local Plan. The ownership of this site is outside the control of IBC. IBC will need to plan for appropriate provision of Gypsy and Traveller pitches. The Council remains committed to meeting the need for permanent pitches, as identified through the Gypsy, Traveller, Travelling Show people and Boat Dwellers Accommodation Needs Assessment 2017.	25467
		Environment Agency	When allocating additional permanent pitches for Gypsies and Travellers, we support the existing policy CS11, which requires under b.ii, for the site to be 'free from flood risk'. Caravans, mobile homes and park homes intended for permanent residential use classed as 'highly vulnerable' so are not permitted in Flood Zone 3, require the exception test in Flood Zone 2, and are very difficult to make safe through raised flood levels. Therefore, we consider that this requirement for Gypsy and Traveller sites to be free from flood risk should be maintained in any new policy.	Support for continued reference to 'free from flood risk' in any future review of related policies acknowledged.	25179

	Ipswich Community Media CIC	Gypsies and Travellers should be protected and not discriminated against.	Romany Gypsies and Irish Gypsies are an ethnic group and protected from discrimination or unfair treatment under the Equality Act 2010.	25249
	Conservative Group	Location is always going to be difficult, but we should insist on more smaller sites rather than larger sites such as West Meadows. Evidence suggests larger sites can cause more problems the larger they get.	Comments and suggestions noted.	25304
Q46: Should the current criteria-based policy for assessing applications Q 47: Is the approach proving effective or are there residential areas where the number of people living in HMOs is considered excessive? Should the policy approach be continued	Ipswich Community Media	Gypsies and Travellers should be protected and not discriminated against.	Romany Gypsies and Irish Gypsies are an ethnic group and protected from discrimination or unfair treatment under the Equality Act 2010.	25468
	Suffolk Constabulary	Yes. HMO's can put disproportionate pressure onto local neighbours, parking provision and noise, which can lead to conflict. Maintaining a high quality of HMO's is essential to ensure the safety of the residents therein, as well as neighbouring properties. This should be reflected in policy DM14.	Comments noted. Houses in Multiple Occupation are a legitimate land use in urban and other areas. They are assessed using an existing policy that suggests a 30% threshold for the proportion of HMOs in a street beyond which the character of the area changes or other planning issues can arise. As there have been no other submissions in respect of the policy affecting the sub-division of family dwellings the current policy is considered effective but the matter will be kept under review.	24851
	Northern Fringe Protection Group NFIG	Yes. The current building density requirements should be regarded as a maximum to prevent undesirable high density developments. Lowering the current density levels will only result in lower quality developments with less open space of which there is already a deficit in most areas.	The emerging plan is likely to retain policies that retain existing policies that guide higher density development to the core of the town. In any event, this will always be a value judgement that measures any proposal against its surroundings.	24980
	Historic England HE	As we have already noted, we would expect to see high density in the town centre but have a concern that high density should not automatically equate to tall buildings.	A density related policy will be retained as part of the review document. The Council's policy for tall buildings has previously been removed and will not be reintroduced as part of the review process. However, the document will contain design oriented policies that broadly reflect the HE perspective set out in this response. Please see comment above.	24939
	On Behalf of East of England Co-operative Society	Boss Hall - The provision of small scale facilities such as gyms and cafes within employment areas is welcomed as it provides benefits for the existing businesses and employees, and opportunities to diversify and strengthen the offer of these areas. This provides a sustainable approach and encourages less reliance on the private car. It is felt that consideration should also be given to a more flexible approach that would facilitate re-use for a wider range of employment generating uses, where this would reinforce the viability and function of the wider employment area.	Support noted	25379
	On Behalf of Aquigen	It is entirely sensible to roll-forward the current Local Plan policy to allow local service uses in Employment Areas. Such uses support the viability of large Business and Industrial Parks supporting the needs of the workforce and visitors alike. Other non-B class uses such as car showrooms also provide important inward investment and skilled employment generating benefits for such locations. This has been successfully demonstrated by the recent openings on the Site.	Support noted	25102
	Private individual	car showrooms are a poor use of land in terms of jobs, this should be refused. In-depth research should be used to see if this is the correct approach - will new cafes / gyms just take business away from existing ones?	Concern noted. The National Planning Policy Framework 2018 promotes regular review of Local Plans and the matter will be considered as part of the Plan monitoring process.	24667
	Ipswich Limited	Without the car showrooms Futura Park would be very empty. Ipswich has long been happy to accept whatever it can passively receive, which isn't the best approach for planning, but it is the only way when the borough isn't bold, ambitious and enthusiastic enough. The "Wine Rack" was supposed to have allocation for affordable housing but this has been dropped for a vanity Dubai-like luxury penthouse apartments, all with AE20m of public funds.	The comments contained in the response are of limited weight in planning policy preparation terms. The planning system functions within a market led (local) economy and may only promote development through a mix of flexible policies and responses to applications in the development management process. There are several sites (in addition to the site mentioned) which illustrate that development economics and individual site viability determine the rate at which development occurs, rather than IBC local plan policies.	25413
	Conservative Group	Small businesses should be encouraged to provide local services as they can become the lifeblood of the community.	Comments noted	25305
	Q50: Should all the sites allocated for employment use be protected from residential or other uses?	On Behalf of The Kesgrave Covenant	No, there is a need for land for both economic growth and housing growth, so converting existing and viable employment land to housing has no net benefit. Clearly there may be small scale changes to employment land allocations to reflect commercial realities, but as a general principle, it is a self-defeating strategy in the context of the Ipswich economic area.	Support for general principle of protecting existing and viable employment land from residential or other uses noted.
On Behalf of East of England Co-operative Society		Boss Hall - It is acknowledged that Ipswich Borough has a challenging job sourcing additional land for housing within its boundaries; however it also has a responsibility to ensure jobs can be delivered within the Borough. Whilst it may be necessary for some employment sites to be de-allocated, given that they have no reasonable prospect of coming forward for such development. It is also vital for certain employment sites, such as the site at Boss Hall Industrial Estate, to remain available within the Borough. This ensures the provision of a range of sites of different sizes in different locations and of the right quality to attract businesses.	Comments noted in relation to Boss Hall Industrial Estate.	25380
Northern Fringe Protection Group NFIG		No. Some flexibility would appear sensible.	Comments supporting a more flexible approach noted.	24981
Suffolk Chamber of Commerce		We strongly recommend that sites currently allocated for employment are sustained and that a presumption should be made against their re-allocation for housing. Business growth and not housing growth will be the primary driver for a more prosperous Ipswich.	Support for protection of employment sites from re-allocation acknowledged. Sites allocated for employment and housing will be considered as part of the Strategic Housing Land Availability Assessment which will inform the preparation of the Local Plan Review.	25157
Private individual		How about a growth area where there is housing and enterprise space e.g. small/medium sized shared office and workshop space? Try to minimise people's commute. Look at taking space and putting it in clusters, not massive industrial estates but enterprise small business space e.g. on Ravenswood where small businesses could base themselves rather than commute into town by car. Stick facilities such as Basepoint next to residential to encourage people to re-locate business closer to home. My own business is based in Bury St Edmunds. There is no appropriate space in Ipswich to relocate it to.	Comments noted and suggestions regarding clustering of small business space and reducing commute times will be considered in the Local Plan review process. The Ipswich Economic Area Employment Land Supply Assessment is currently being updated and this will provide additional evidence and recommendations on employment allocations and policies.	24791
Private individual		Decrease the number of high-rise buildings around the town and number pointless office blocks stand empty for many years.	Comments noted. It is pertinent to note that high-rise buildings are not always for office use but comments regarding vacancy rates noted.	24835
On behalf of FIS Property and Landex Limited		Where sites are specifically allocated for new employment use, rather than simply being within defined Employment Areas, then so long as they constitute high quality employment land then they should be protected from other uses. However, secondary employment sites, even within defined Employment Areas, should not be protected from other uses, including residential. Policy should allow for redevelopment of these areas to provide regeneration and for urban land to be used as efficiently as possible, including mixed developments which may be residential-led.	Support for protection of new employment use allocations and relaxing of protection on secondary employment sites noted and will be considered in the Local Plan Review process. The Ipswich Economic Area Employment Land Supply Assessment is currently being updated and this will provide additional evidence and recommendations on employment allocations and policies.	24876
Private individual		Yes. If we nibble away employment sites it becomes increasingly difficult to meet jobs targets through the local plan.	Comments in support of protection noted.	24780
On Behalf of EDF Energy		We don't consider that it's feasible to continue to allocate the site at Cliff Quay for 100% employment. The allocation for mixed-use development would optimise opportunities with part allocation for residential being an enabler for the site to come forward for development. We understand that the Council has concerns regarding the impact of the water treatment works on potential new housing development. However, we consider that the site can be configured to offset against any potential impacts, taking into account the size and topography of the site and specific measures that can be incorporated into the building design.	Comments regarding suitability of Cliff Quay for mixed-use rather than 100% employment noted. The Strategic Housing and Employment Land Availability Assessment will need to review such as this and determine whether the allocation needs to be updated or not.	25077
Gladman Developments		It is vital that the Local Plan continues to identify locations to meet strategic and general employment needs. The area is well placed to benefit from the expansion of the transport and logistics sector. The east of Ipswich is well placed to support this expansion through the delivery of mixed use urban extensions. Furthermore, Ipswich and the New Anglia LEP area is recognised to have a strong and growing digital technology sector. It is essential that Local Plans create the right environment in which these industries can further develop.	Insights into future employment needs and sectors welcomed and noted. These will be taken into consideration in the formulation of the Local Plan review and in conjunction with any other evidence obtained.	25391
New Anglia LEP for Norfolk and Suffolk	Three Space to Innovate Enterprise Zone sites are located within the town; Futura Park (E17 on the plan), Waterfront Island (a mixed use site) and Princes Street (E7). These sites have strong potential for employment development, as evidenced by the sector summary tables within the recent Ipswich Economic Area Sector Needs Assessment (Lichfields, September 2017, Table 16.4). They are also incentivised for development with Enterprise Zone status. New Anglia would therefore urge the Borough Council to continue to protect these sites for employment purposes.	Commentary and recommendations from the LEP are welcomed and noted. IBC will take these into consideration when determining whether any employment allocations and/or policies need to be reviewed.	25226	
Pigeon Investment Management Ltd	The sites allocated for employment use should be protected from residential or other uses. With a high jobs target a wide variety of employment land is needed to provide flexibility in the employment land market. The requirements of businesses vary significantly and to meet the jobs target an over provision of employment land is required. This approach was found sound in the recent local plan examination in the Borough. The recently adopted Local Plan policy CS13 protects land in existing allocated employment areas for employment uses. This should be continued.	Support for continuation of existing policy approach recognised.	25371	
Ipswich Limited	Yes. The council is very anti-car but this is how we all rely on getting to work when there isn't enough local employment opportunities. Buses do not provide a good service to the door of an out-of-borough employer. This creates relatively unnecessary congestion. Residential development is being forced upon by central targets and there just isn't the allocation of employment zones to cater for the density of planned housing.	Comments noted. Employment land will be reviewed as part of the plan making process, as will the allocation of appropriate levels of car parking.	25414	
Conservative Group	This should be addressed on a case by case basis but we should consider mixed use developments such as those in Norwich.	Comments noted. Mixed use developments are allocated within the IP- One area along with the centre first approach which delivers sustainable development in appropriate urban centres.	25306	
Q51: Should the Council allocate more employment land than is needed to ensure choice?	Northern Fringe Protection Group NFIG	A degree of flexibility would appear sensible. We note in the current local plan a margin of 150% has been provided which we consider excessive in view of the shortage of housing land.	View that current margin of 150% is excessive acknowledged. This will be borne into consideration when reviewing the Local Plan.	24982
	Private individual	No - current strategy is poor so why should you be trusted to over allocate?	Concerns regarding current strategy noted.	24668
	New Anglia LEP for Norfolk and Suffolk	Whilst it is recognised that sites should not be protected for employment when there is no reasonable prospect of delivery, the Borough Council will be mindful of the need for a supply of employment land and different types of units to ensure that businesses have opportunities to relocate and grow. The New Anglia LEP has a range of programmes to assist with bringing forward development sites and supporting the development of new business uses, particularly in key sectors and specific priority locations identified within the new Economic Strategy for Norfolk and Suffolk (such as Ipswich and Enterprise Zone sites).	Reminder of the need for a supply of employment land and different types of units appreciated. Highlighting of programmes to assist delivery of development sites and supporting new business uses through LEP noted.	25227
	Pigeon Investment Management Ltd	The recently adopted Local plan allocated more employment land than was needed to ensure choice and this approach was found sound and should continue. There are good reasons for doing this due to the variety of business types and the premises that they would need. A good supply of employment land is important to ensure that businesses have choice of premises in order to attract business to the Borough. It is a key ingredient of Ipswich's future prosperity that it sustains its aspirational employment vision and continues to provide a choice of employment opportunities for existing and potential employment businesses.	Support of existing approach acknowledged.	25372
	Ipswich Limited	This isn't particularly relevant as the trend is for employers to be within the Ipswich FEA ("Ipswich city") area but not within the Ipswich borough. The next decade will see more business relocate outside the town - some will argue about business rates and others about traffic congestion.	Thoughts on future direction of travel or businesses noted and considered.	25415

	Conservative Group	No.	Comments noted.	25307	
Infrastructure and Transport	Q52: What marketing should we require to prove redundancy of a site for business, industry or storage and distribution?	On Behalf of Aquigen	We consider that the present Policy DM25 marketing test is appropriate in establishing whether a site is suitable / viable for employment use or not. The marketing period represents an appropriate balance and reasonable time period for demonstrating whether a specific site is required or not. As such, aside from its use for development management purposes, it can inform allocations going forward.	Comment noted.	25103
		On Behalf of EDF Energy	We consider that 6 months marketing evidence should be sufficient in order to demonstrate the lack of demand for the land. This approach would be in accordance with paragraph 22 and 51 of the NPPF.	Comment noted.	25076
	Q53: Is the current system of funding infrastructure effective? Should the Council consider introducing a tariff-based charge to fund infrastructure?	Mersea Homes	The IGS demonstrates that where the Council coordinates infrastructure funding offered through S106 agreements, it is possible for the planning and provision of strategic infrastructure to be undertaken on a comprehensive basis. For large scale strategic developments such as the IGS, this is the preferred mechanism rather than relying on tariffs.	The Council has maintained its commitment to obtaining Infrastructure through the planning obligations process as this allows some flexibility in relation to the economic viability of individual sites.	25489
		Suffolk County Council SCC	In some circumstances, S106 is the most appropriate way of securing developer contributions, in others CIL is more appropriate. The determining factor is the value to be derived from development against the cost of infrastructure. CIL is useful for the mitigation of cumulative impacts but does not currently function when the total cost of infrastructure will not be supported by the income from the levy. The Borough Council should give close consideration to the potential benefits of implementing a tariff-based charge, but will clearly need to be mindful of the changes being proposed by Government.	IBC will continue to monitor progress with the delivery of a tariff based approach in conjunction with its partner authorities in the continuing effort to maximise developer contributions for the public purse.	25453
		Private individual	The current system is bound up with CIL regulations and too much reliance on section 106 agreements. A tariff based charge is likely to be easier and more effective and timely.	Please see comments above	24781
		Environment Agency	If a Community Infrastructure Levy is to be adopted, we would welcome contributions towards flood risk infrastructure such as the future maintenance of the tidal barrier and existing tidal and fluvial defences.	The hypothetical request is noted, however, the EA will be aware that if IBC wish to adopt a tariff based approach then there is a rigorous examination process to determine the extent and size of contributions that are received and dispensed through the process.	25181
	Q54: How best can we tackle congestion in Ipswich?	Associated British Ports ABP	ABP supports the efforts of IBC and SCC to progress the Ipswich Northern Route Study and to bring forward proposals to secure transport capacity improvements which will benefit strategic and local traffic accessing and egressing the Port.	Suffolk County Council's work for the initial design and business case for the Ipswich Northern Route during its being undertaken in the early part of the plan period. The Council will aim to support strategic road improvements such as the Northern Route where it has positive impacts on Ipswich.	25086
		Suffolk County Council SCC	A variety of measures are needed to tackle congestion in Ipswich. As identified in the Suffolk Local Transport Plan, the key change required in Ipswich is in behaviour, to increase travel by sustainable modes and reduce the use of motor vehicles. Whilst new development will make up only part of total demand on the highway network, our authorities can work to ensure that new development makes appropriate provision in respect of facilities for walking and cycling. Our priorities should be to: - Reduce the need to travel - Make efficient use of transport networks - Improve infrastructure	The local plan review is to maintain the Borough's stance with policies that seek to deliver networks of interconnected public open spaces and cycle routes through them, in an effort to make alternative forms of cross town movement more attractive.	25452
		Northern Fringe Protection Group NFFG	A northern relief road to accommodate the IGS development and ease current congestion. Road improvements to alleviate the existing congestion in the town centre. Deliver IGS SPD infrastructure requirements. Cross-boundary Transport Assessments for the draft Local Plans. No further development if it increases congestion, or worsens air quality, without appropriate remedial measures. Enforce planning conditions about transport infrastructure/travel plans. Better sequencing of traffic lights and pedestrian crossings. A roadworks permit system. Specific walking/cycling measures e.g. improving cross-town cycling infrastructure. Allow cars to use bus lanes outside peak times. Reinstate Norwich Rd Park and Ride. Assess the viability of direct cross-town bus routes. Improve Westerfield Railway Station and the Ipswich-Felixstowe line. Assess the viability of a further station at Futura Park.	Comments noted. Most of the individual elements of the package of measures raised in the submission are under current consideration. Following new national guidance, Suffolk County Council will be introducing a roadworks permit scheme. The opening of bus routes to general traffic has been trialled but as a result of some misunderstanding on the part of road users the scheme was not confirmed. Although there are no plans to reopen the Bury Road Park and Ride due to financial constraints on subsidies, the Council (as the owner of the site) has preserved the operational elements of the facility and will safeguard them for the future. The Westerfield Station improvements will be resolved as part of the IGS development and the Council remains supportive of capacity improvements for the Ipswich to Felixstowe line which will need to be agreed by Network Rail. The provision of a new station at Futura Park is considered unlikely on the basis of cost. The Northern distributor road will not be required to facilitate the delivery of the IGS as (with junction improvements in the area) the existing road network has the necessary capacity. The Northern distributor road will need to be agreed as part of a more significant development package that will be comprehensively planned in future review stages.	24983
		Save our Country Spaces SOCS	Road improvements are needed to alleviate existing congestion in the town centre. Deliver IGS SPD infrastructure requirements. Cross-boundary Transport Assessments for the draft Local Plans. No further development if it increases congestion, or worsens air quality, without appropriate remedial measures. Enforce planning conditions about transport infrastructure/travel plans. A roadworks permit system. Specific walking/cycling measures e.g. improving cross-town cycling infrastructure. Allow cars to use bus lanes outside peak times. Reinstate Norwich Rd Park and Ride. Assess the viability of direct cross-town bus routes. Improve Westerfield Railway Station and the Ipswich-Felixstowe line. Assess the viability of a further station at Futura Park.	Please see comments above.	25052
	Suffolk Chamber of Commerce	We hope that the Council will continue to support the Suffolk Chamber-led No More A14 Delays in Suffolk campaign which advocates improvements to, amongst others, Junctions 53 (Whitehouse), 55 (Coppdock), 56 (Wharsted), 58 (Ransomes), and 58 (Seven Hills). In that context the Plan should identify, where necessary and possible, opportunities for the Council to 'mesh' with any proposals emerging from Highways England or the highways authority. The Suffolk Chamber of Commerce strongly supports proposals that will evaluate, alternative routes round and through Ipswich to alleviate congestion including the Upper Orwell Crossings, a Northern Bypass and solutions to the heavily-congested gyratory and bottlenecks into and out of town such as the A1156, A1189, A1214 and A1071. Likewise we wish to see more careful forward planning of the infrastructure necessary to service new developments sites for example at Futura Park and Ransomes Europark. We support the introduction of innovative transport and parking solutions to tackle congestion and stimulate footfall such as the continuation (or re-establishment, at ASDA) of simple and affordable park and ride schemes, more customer-friendly car park charging schemes, bus timetabling better synchronised to business needs and improved routes and facilities to encourage cycling.	Comments noted - the Council supports the campaign for measures to promote the free movement of traffic on the A14. The Upper Orwell Crossings are currently under review by the County Council and the Northern distributor route is at an early study stage considering the possible options. Although there are no plans to reopen the Bury Road Park and Ride due to financial constraints on subsidies, the Council (as the owner of the site) has preserved the operational elements of the facility and will safeguard them for the future.	25162	
	Private individual	How about a growth area where there is housing and enterprise space e.g. small/medium sized shared office and workshop space? Try to minimise people's commute. Look at taking space and putting it in clusters, not massive industrial estates but enterprise small business space e.g. on Ravenswood where small businesses could base themselves rather than commute into town by car. Stick facilities such as Basepoint next to residential to encourage people to re-locate business closer to home.	Comments noted. The concept of placing homes near to or alongside places of employment (often referred to as Live/Work spaces) remains a useful method of reducing the volume of commuter traffic. Existing policy terms are able to deal with these proposals in a positive way and an individual policy would not be necessary.	24792	
	East Suffolk Travellers Association	As the document states, 'Creating roadspace is not the only solution.' Future growth of employment and leisure facilities must take into account how easy it is to access these by train and/or bus. Better access by public transport to key destinations on the periphery, e.g. the hospital, Ransomes Europark and Whitehouse Employment Area, must also be addressed. The document also refers to the future role of electric vehicles. These may indeed have a role to play for all or part of a journey. However, electric cars must not be seen as panacea for all problems, because they still cause congestion.	The aims of the response are broadly supported in the existing policy and allocations of the plan. While bus services have been created to connect centres around the outside of the town centre (i.e. without having to enter the town centre) these services have not proved sufficiently well used and have been run on the basis of public subsidy. In the absence of financial support these services have not been maintained.	24812	
	Private individual	Promote sustainable transport modes. Get Suffolk C.C. to send buses to places where people actually want to go. A reliable train service between Derby Road Station and Felixstowe could be a massive plus point but trains appear to be cancelled more often than not. Reduce car parking spaces. Charge businesses a tax on car parking spaces they have for their employees which can then be used to promote cycling and bus services. This also encourages businesses to get their staff to use the bus etc.	The Ipswich to Felixstowe route is shared by goods trains and a passenger service. Network Rail are currently increasing the capacity of the line to allow more goods trains to run and the additional "space" generated on track as a result should allow passenger trains to run more reliably. In respect of your suggestion to "charge businesses a tax on car parking spaces they have for their employees" the power to introduce a workplace charging levy rests with Suffolk County Council. For bus commentary please see above.	24689	
	Suffolk Constabulary Private individual	Provide more park and ride options (i.e. re-open Bury Rd, even if only for peak periods). Strategies are needed to restrict the number of vehicles entering and moving about near the city centre. These should include a drastic reduction in the number of parking places available for visitors or commuters (there should be a more effective scheme for residents that grants a sufficient number of parking spaces for resident permit holders, electric vehicles and blue badge holders). The current parking system in Ipswich seems to deliberately encourage motorists to drive into the city centre, and unfortunately it is very effective. At the same time, the offer of sustainable transport needs to be improved. Priority and focus should be given to key pedestrian and cycle routes throughout the area. These are Princes Street from the town centre to the station; Queens Street, St Nicholas Street and St Peters Street to the Waterfront; Tacket Street and Fore Street through Blackfriars to the Waterfront, and links from the Station to the Waterfront within the Riverside Quarter. This 'triangle' of movement, including links to Christchurch Park, are illustrated within the Vision document.	Please see response on line 445 The Council's car parking strategy runs alongside planning and other transport initiatives. To help restrict demand for access to new long term car parks are proposed for the town centre. The Council is also considering the use of the existing car parks being made available for local residents parking in the non peak hours. New policy revisions will provide for an increase of electric charge parking bays. The local plan recognises the importance of the areas indicated in the submission as they are important links in the network of spaces and green open spaces which the Plan seeks to develop to provide encouragement for cycling and walking across the town, generally. The Council will utilise the emerging Public Realm SPD to help identify where town centre improvements can be implemented, as opportunities arise, in an effort to form attractive connections between the different parts of the town.	24857 24728	
	Ipswich Central	Priority and focus should be given to key pedestrian and cycle routes throughout the area. These are Princes Street from the town centre to the station; Queens Street, St Nicholas Street and St Peters Street to the Waterfront; Tacket Street and Fore Street through Blackfriars to the Waterfront, and links from the Station to the Waterfront within the Riverside Quarter. This 'triangle' of movement, including links to Christchurch Park, are illustrated within the Vision document.	The local plan recognises the importance of the areas indicated in the submission as they are important links in the network of spaces and green open spaces which the Plan seeks to develop to provide encouragement for cycling and walking across the town, generally. The Council will utilise the emerging Public Realm SPD to help identify where town centre improvements can be implemented, as opportunities arise, in an effort to form attractive connections between the different parts of the town.	25094	
	Ipswich Limited	Congestion can be tackled with many common sense tactics:- * By not adding to it. * By not reducing existing road capacity (i.e. not moving back stop lines, not adding large ASL boxes on routes cyclists don't use, not adding in so many sets of lights on the gyratory). * By not bolting on supermarkets, retail parks and fast food outlets on to busy A-road junctions. * Widening the A1214 London Road so two lanes into town * By upgrading roads and building new infrastructure	Comments noted	25416	
	Conservative Group	Ensure IBC & SCC have the same objectives for transport and are working towards the same goals rather than working against each other for political reasons.	Comments noted. IBC seeks to work in conjunction with SCC having regards to highway priorities.	25308	
	Private individual	In 2036 I would like Ipswich to have celebrated several years of the roads being cycle safe with designated lanes separated from electric vehicles, primarily public transport and essential services.	The Council work with its partner agencies towards these broad objectives.	25529	
	Private individual	Have better traffic management between Sainsbury's Garage and the Mermaid.	These interconnected junctions are managed as part of an integrated system that is kept under regular review. The flow through them is monitored constantly and may be changed to suit the needs of the local road network.	25514	
	Private individual	Solve the inner ring road traffic	The Inner Ring road is also managed as part of a town wide system but further improvement is now dependent on the delivery of other schemes that can relieve traffic pressures from other parts of the town.	25523	
	Private individual	Traffic improvements to allow free flow around the town.	As above	25525	

Q55: How can sustainable modes of transport be encouraged?	Associated British Ports ABP	The Ports NPS recognizes shipping as a sustainable mode of transport. The identification of the Port of Ipswich as a strategic transport hub and the inclusion of policy (ideally) and wording which specifically seeks to support and protect the function and role of the Port in the town, as suggested in our response to Question 30 above, would encourage this form of sustainable transport.		25087
	Sports England	Sport England supports the development of sustainable modes of transport such as walking and cycling, as they increase levels of physical activity in the population. Sport England would encourage IBC to develop a sustainable transport plan for the Borough to help develop existing infrastructure and prioritise investment.	Policies relating to sustainable modes of transport will be reviewed to ensure that a comprehensive approach is taken. Policies supporting cycling and walking and improved accessibility to the town centre will be drafted.	24878
	Northern Fringe Protection Group NFG	Implement specific walking/cycling measures e.g. improving cross-town cycling infrastructure. Cycling needs to be made much safer. Improve air quality in and around the town centres, to make it healthier to walk/cycle. Traffic regulations should be better enforced to prevent vehicles blocking cycle lanes. Assess the viability of direct cross-town bus routes that avoid the need to go into the town centre. Bus service frequencies in some areas are lower than is desirable. The Norwich Rd Park and Ride should be reinstated. Improve Westerfield Railway Station and the Ipswich-Felixstowe line. Assess the viability of a further station at Futura Park.	Please see comments above	24984
	Suffolk Chamber of Commerce	Bus incentives need to be considered to encourage better use of public transport to prevent congestion from driving visitors away to out of town shopping centres or to other towns. We support proposals that create better links between the retail centre and both the railway station and the Waterfront.	Comments noted however, fiscal measures in support of public transport cannot be influenced by land use planning policies.	25164
	Private individual	The main part of town has no capacity for more vehicles. The town is not too large for cycling but it needs to be made easy for people. Redevelop the cycle network e.g. a direct route into town from the east. Encourage people to cycle from a to b instead of drive by giving them a serious credible option: a proper lane that is smooth, flat and separate from traffic. Not by a kerb but clearly coloured and defined and properly made. Put in the infrastructure properly and the cyclists will come.	The Council in conjunction with its partners will continue to consolidate cycling (and walking) initiatives that strengthen the network of routes.	24785
	Private individual	Renewable energy seems to be not only the new trend, but a promising and sustainable future technology. Ipswich town centre has a scale that can support cycling and the use of electric vehicles. The current infrastructure needs to be improved, but mainly create a coherent route where people feel safe and tempted to cycle or walk to work. For further routes, electric cars and buses seem promising but you also need to think about charging stations.	Comments noted.	24798
	East Suffolk Travellers Association	Future growth of employment and leisure facilities must take into account how easy it is to access these by train and/or bus. Better access by public transport to key destinations on the periphery, e.g. the hospital, Ransomes Europark and Whitehouse Employment Area, must also be addressed. The document also refers to the future role of electric vehicles. These may indeed have a role to play for all or part of a journey. However, electric cars must not be seen as panacea for all problems, because they still cause congestion.	Please see comments above	24813
	Private individual	Restrict the number of vehicles approaching the town centre by a) increasing park and ride facilities at the town border, b) drastically restricting parking space available to non-residents in the town centre, c) improving public transport. If the new vehicle bridge can be used wisely to draw traffic away from the gyratory system AND bold initiatives are taken to reduce vehicle numbers and shift usage to more sustainable modes, the highly commendable Waterfront Town Centre dream could become reality. There must be methods to stop traffic being drawn in from the A14 (height/weight restriction for the new bridge? diesel surcharge?)	Please see comments above	24730
	Conservative Group	Cheaper parking for electric vehicles and more charging points. Potential for tax breaks to employers who promote sustainable transport for their employees.	Policy revisions expecting new Electric Vehicle Charging Spaces in development are included in the emerging plan. The County Council is able to respond to green travel plans but the IBC cannot influence taxation policy in the manner envisaged.	25309
	private individual	Expansion of the shuttle bus service to all leisure centres and commercial services.	The shuttle bus service has a specific function and a limited service route. Further expansion of this service which is subsidised (from a fund derived from parking fees paid by members of IBC staff) is not appropriate as the subsidy cannot be extended and the offer of free bus services would be affecting the working of the local enterprises which offer commercial services locally against competition regulations.	25519
private individual	Promote cycle routes.	Please see comments above	25524	
private individual	Have a cycle track and footpath from Stowmarket to Ipswich Waterfront.	This is a highway maintenance issue within the control of SCC	25513	
Q56: What changes, if any, would you like to see to the gyratory?	Suffolk County Council SCC	The County Council as Highway Authority will work with partners to consider what changes to the gyratory are necessary or desirable to improve connectivity between the town centre and Waterfront, based changes in traffic flows arising from the delivery of the Upper Orwell Crossings. There may be opportunities for local environmental improvements and better cycling connectivity between the east and west of the town.	Comments noted. Improved connectivity for pedestrian and cyclists in the gyratory would be supported.	25451
	Historic England HE	The Star Lane and College Street / Key Street gyratory impacts heavily on the historic environment. It severs connectivity between the town centre and Waterfront, and directly impacts on listed buildings and scheduled monuments and their settings. Improving the current situation is critical to successfully regenerating and knitting back together these historic parts of Ipswich.	Historic England will be consulted on applications and initiatives for the improvement of the public realm in the area identified.	24940
	Private individual	Stop filtering buses from East Ipswich up to Tower Ramps - get a better mix of Tower Ramps / Central Ipswich / Ipswich Train Station	Traffic management and bus routing may not be addressed in local plan policy.	24670
	Private individual	The gyratory system needs to be safer for vulnerable road users (cyclists, pedestrians and especially wheelchair and other users with disabilities).	Comments noted. Improved connectivity for pedestrian and cyclists in the gyratory would be supported.	24731
	Ipswich Central	The Star Lane gyratory system presently restricts and endangers pedestrian and cycle routes to and from the Waterfront. It should be rethought with the primary aim of improving the vista through to Waterfront and of creating a sense of arrival rather than a barrier.	Comments noted. Improved connectivity for pedestrian and cyclists in the gyratory would be supported. Work will continue with SCC on highways matters to improve the borough road network.	25093
	Ipswich Limited	Ipswich Vision were due to have published a plan for the Star Lane gyratory this year. Ipswich Borough Council tendered out an opportunity for public realm improvements. Star Lane gyratory was never going to be suitable, the future for this area would consist of giving better alternative routes. Public transport isn't a solution as the AQMA monitoring station on Fore Street which is heavily used by buses was at dangerous high levels and much higher than other areas used by lorries, vans and cars.	Comments noted - further options will be considered during the plan period but these will be linked to the decisions taken concerning the Upper Orwell crossings.	25417
	Conservative Group	Continued support for the Upper Orwell Crossings as they have the potential to allow changes to the gyratory that would benefit the town as a whole.	Support noted.	25310
	Suffolk County Council SCC	The Upper Orwell Crossings offer enormous benefits for growth and development in Ipswich. Our authorities should work together to consider how the Local Plan might support the realisation of some of the benefits identified within the business case for the bridges. Other than the Upper Orwell Crossings, our authorities should work together to promote sustainable transport infrastructure and measures for increasing the quality of sustainable transport routes and permeability by sustainable modes. For example, there are several locations where new pedestrian and cycle bridges could overcome barriers to movement, such as Bull Road and the Rosshill Centre, or over the River Gipping between Hadleigh Road and Sproughton Road.	Comments noted. IBC has worked with SCC on TUOC project in a consultative approach. A wet dock crossing is supported in the adopted local plan.	25450
	Northern Fringe Protection Group NFG	A northern relief road is required to accommodate the IGS development and ease current congestion. Road improvements are required to alleviate the existing congestion in the town centre. Deliver IGS SPD infrastructure requirements. Cross-boundary Transport Assessments for the draft Local Plans and test remedial measures identified. No further development if it increases congestion, or worsens air quality, without appropriate remedial measures. Transport assessments for new developments and implement planning conditions about transport infrastructure/travel plans. Improve Westerfield Railway Station and the Ipswich-Felixstowe line. Assess the viability of a further station in the vicinity of Futura Park.	Traffic management, junction improvement and other efforts to improve highway capacity have meant that the IGS can be delivered without the necessity of the Northern distributor road being brought forward. Air quality protection has been addressed in the formulation of a new draft policy.	24986
	Save our Country Spaces SOCS	Road improvements are required to alleviate the existing congestion in the town centre. Deliver IGS SPD infrastructure requirements. Cross-boundary Transport Assessments for the draft Local Plans and test remedial measures identified. No further development if it increases congestion, or worsens air quality, without appropriate remedial measures. Transport assessments for new developments and implement planning conditions about transport infrastructure/travel plans. Improve Westerfield Railway Station and the Ipswich-Felixstowe line. Assess the viability of a further station in the vicinity of Futura Park.	As above	25051
Suffolk Chamber of Commerce	There is an urgent need for the provision of a taxi rank on the Waterfront, for both business development and public safety reasons, and this is a long overdue promise of the public authorities.	The Council will continue to negotiate within the constraints of land ownership for a Taxi rank for this area.	25165	
Private individual	Ipswich is very wide in comparison to other towns. This does not help in making the whole town accessible. Go north, put the infrastructure in and build the northern route. [See also response to Q4 regarding cycling infrastructure]. It is probably too late now, but there's a lot of remodelling of the junctions around East Ipswich; I wonder if any consideration for cycles has been put into those?	Please see comments above	24789	
East Suffolk Travellers Association	Improvements are needed to the local rail network. Atkins, consultants to East/West Rail, are putting the case for an increase in train service frequency into Ipswich from Bury St Edmunds and Felixstowe. This will require additional platform capacity at Ipswich and double-tracking the Felixstowe line. The proposed Ipswich Garden Village should benefit from a relocated Westerfield station served by more trains than at present. East Suffolk Line capacity should be enhanced to enable half-hourly services to Woodbridge and Saxmundham, and provide Woodbridge with a more attractive service into Ipswich. Ideally, the entire section from Woodbridge to Saxmundham should be re-doubled.	Please see responses above. Council supports east to west rail improvements - some of the enhancements are beyond the scope of the plan and require regional coordination.	24809	
private individual	Re-open the park and ride. Put in links to the hospital from each of them, reducing the need for so much parking at the Hospital, allowing the Hospital to develop and giving the staff a place to park. Replace 90% of pedestrian crossings in town with footbridges over roads. Reduce the number of traffic lights to allow freedom of movement. Increase the number and quality of cycle lanes by making sure that the road surfaces are suitable for bikes. Reduce the number of cycle lanes on paths. Maintain and repair sleeping policemen or find more effective ways of reducing speed.	The Park and Ride Bury Road site has been purchased by the IBC who have retained the key infrastructure should the service need to be reinstated. Other suggestions are likely to be prohibited by cost but speed reduction measures are under constant review along with other traffic management measures.	24833	
NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)	We would support a design policy that promotes social inclusion, particularly for the ageing population and provides easy access to local services, without the use of a private vehicle. We would also request that consideration is given to design of access within new developments for blue light services. We would like to highlight that in order for the NHS to introduce new ways of working and increase capacity in, and access to, primary care it is vital that our infrastructure is serviced by adequate public transport systems and communication infrastructure.	The Council supports social inclusion and through relevant planning policies will seek to improve connectivity in the Borough.	24899	
Private individual	It makes sense to invest now in Hybrid Electric and Pure Electric vehicles. Ipswich can benefit from grants and schemes that may have dried up by the time investment becomes obligatory in 2040. In addition, if infrastructure is installed on new developments now, it removes the potential future cost of retrofitting.	The Council will consider the inclusion of an EV Charging Point policy to encourage the availability of top up points.	24736	
Private individual	A trolley bus route for central area - going to Station, Shops and Waterfront	Comment noted	24750	
Q58: What type of transport infrastructure for the future, such as electric charging points.	Suffolk County Council SCC	Our authorities should plan for changes in transport, with a focus on encouraging sustainable and low carbon travel. Particularly in Ipswich, where journeys may be shorter than in the rural areas, our authorities should work towards an alignment of standards and design approaches.	Noted.	25449

		Private individual	Renewable energy seems to be not only the new trend, but a promising and sustainable future technology. Ipswich town centre has a scale that can support cycling and the use of electric vehicles. The current infrastructure needs to be improved, but mainly create a coherent route where people feel safe and tempted to cycle or walk to work. For further routes, electric cars and buses seem promising but you also need to think about charging stations.	The Council has invested in the provision of 28 electric vehicle charging points in the new Crown car park and is also intending to provide these in the Elm Street car park. Once the level of use of these has been evaluated, a decision on the potential provision of additional electric vehicle charging points elsewhere can be considered.	24797
		Private individual	See my answer to Q57 for the case for installing charging points now rather than in the future. Here are the main proposals: IBC to fit EV chargers to a percentage of all council-owned parking spaces; IBC to require builders of large commercial properties to provide EV charging, e.g. chargers at supermarkets, shopping centres, workplaces, etc. IBC to require builders of residential estates over a certain size to provide for future EV charging at home by the residents. IBC to investigate options for providing 'on street'; residential charging infrastructure to terraces where off street parking is not available.	The Council has included EVCP in development management policy alterations and has previously adopted the Suffolk County Council guidance for Parking 2015 that also deals with charging point issues	24737
		Ipswich Limited	A Northern Bypass is long overdue. A single-carriageway solution would be over capacity within months of opening, therefore a dual carriageway road is required to support further growth. An Ipswich Orbital will help with the housing, retail, commercial and industrial developments in the northern arc of Greater Ipswich. Suffolk Highways could allocate more resources to finish projects on time. Currently the same staff work on numerous projects in the area (even outside Ipswich) and it is unnecessarily damaging for the town.	Suffolk County Council are giving consideration to the provision of a new 'northern route' road and this is of particular interest to the Borough Council.	25418
Q59: What should be the approach to planning for long stay commuter parking and short stay shopper parking in central Ipswich?		Ipswich Community Media	Not having unnecessary new charges stuck on (i.e. - the Norwich road car park being till 8 now - I mean, you can park on yellow lines from 6).	The extension of charging hours on the Council's South Street car park has made it consistent with the Council's other off-street public car parks. Decisions on the time at which on-street parking restrictions apply rest with Suffolk County Council as the Traffic Authority.	25469
		Suffolk Chamber of Commerce	Multi storey car parks should be located as near as possible to those shopping zones highlighted as prime and underground parking facilities in flood free zones should be considered under any new multi storey building.	The Council is currently working with Suffolk County Council on a Parking Strategy for Ipswich and it is hoped that the issue of the location and size/type of new public car parks will be addressed as a result of work arising from this.	25163
		private individual	I feel there are many short stay parking spots in a 10-15 minute distance from the town centre, so my comment would not be with adding more, but with finding ways to encourage people using them more. Lighting, a green route, and cafes along the way would be some ideas to help with this.	As above	24799
		Private individual	The current system encourages long stay commuter parking and short stay shopper parking in central Ipswich. This is a mistake. It results in congestion and pollution and has made the town look like a permanent car park. I should like to see permit-holder schemes introduced for residents in the town centre and in the areas south of the river, adequate spaces for blue badge holders and electric vehicles. Overall there should be a reduction of the number of parking spaces available.	24732	24732
		Conservative Group	Short Stay parking in IBC car parks should be cheaper to encourage more visitors.	The charges set by the Council for the use of its town centre short-stay car parks are carefully balanced in order to try and ensure that they support the economy of the town centre whilst not seeking to encourage traffic that could use other more sustainable modes of transport owing to concerns over traffic congestion and air pollution. The Council provides some of the cheapest public car parking in Ipswich.	25311
		Private individual	I think the town would also benefit from more free parking. It is far too expensive at the moment. Pay and display car parks are also a bad idea, they discourage people from staying, shopping and eating in Ipswich, as they are always rushing back to the car to avoid a ticket.	As above.	25526
Q60: Is the boundary of the Central Car Parking Core in the right place?		Suffolk County Council SCC	The County and Borough Councils are already working together to consider potential answers to these questions. Car parking provision needs to strike a balance between supporting the vitality of the town centre and managing congestion. As part of this ongoing work, and based on the opportunity afforded by the Local Plan review, the Borough Council should reconsider the boundary of the central car parking core and how it relates to, for example, employment development in the Princes Street area.	The boundary will be made after the Ipswich Parking Strategy has been finalised and this matter will be kept under review.	25441
		Private individual	I have read the principle behind the Central Car Parking Core and disagree with the principle. Parking in this area should be restricted to a) residents, b) blue badge holders, c) electric vehicles, d) car-sharing vehicles. Of course, there should be allowances for loading for the businesses in this area.	The Council accepts the importance of restricting long stay in the heart of the town centre, it is necessary to allow some short stay public parking to support the economy of the town.	24733
		Ipswich Limited	Not at all. If the town centre is ever going to survive (let alone thrive) we need car parking capacity to support it.	Comments noted. The Ipswich Parking strategy will continue to seek additional parking provision.	25419
Q61: Are additional car parks needed to serve town centre shops or leisure facilities? If so, where?		Suffolk County Council SCC	The County and Borough Councils are already working together to consider potential answers to these questions. Car parking provision needs to strike a balance between supporting the vitality of the town centre and managing congestion. As part of this ongoing work, and based on the opportunity afforded by the Local Plan review, the Borough Council should reconsider the boundary of the central car parking core and how it relates to, for example, employment development in the Princes Street area.	As above	25448
		Private individual	Car parks are plentiful within the town. Why not turn a number of the car parks into multi-storey car parks and build on the other car parks. Cheap car parking is plentiful in the town. A reduction in the number of car parking spaces could seek to promote sustainable modes of transport reducing the traffic in the town. [N.B. Comment duplicated from Q20 to ensure it is also picked up under car parking].	As above	24953
		Private individual	Yes, at the various access points to the urban area (Park and Ride). Where possible these P&R access points should be increased and improved. (Incidentally, it might be of interest to have car-share and EV hire schemes running from these points.) With reference to my previous comment for this question, I want to make it clear that I think that no additional car parks should be built close to the town centre. I think that existing Park and Ride facilities should be extended and new Park and Ride facilities should be created at key entry points close to the A12 and A14.	The Council will seek to retain the existing P&R at Anglia Parkway, and will investigate the possibility of allocated further land for a future P&R at Ravenswood in SE Ipswich.	24734
		Ipswich Central	Whilst issues of congestion are noted, Ipswich must be seen to be 'open for business' for the car-borne visitor. We believe that the number of poor quality, temporary car parking sites should be restricted and that opportunities for quality, often multi-storey, provision stimulated. Ideally, the town would have four major car parks, one within each of the Eastgate, Westgate, Central and Saints/Waterfront Quarters.	The Council has a policy to prevent the introduction of new temporary car parks within the central car parking core area.	25092
		Ipswich Limited	Full retention of existing car parks including temporary (pending suitable change of use).	Existing temporary car parks have mostly had any renewal application permitted provided that the appropriate facilities are installed.	25420
Town, District and Local Centres	Q62: Do you agree that the town centre and Central Shopping Area boundaries are drawn in the right place? Which streets would you like to see included within the Central Shopping Area - or excluded from it?	Private individual	Norwich Road is a GIFT If we were in Norwich they would know this - they capitalise on such brilliant diversity and support it - lets celebrate it and bring it in to the BID areas etc. Support the Norwich Road development projects - whilst maintaining the unique and diverse quirky appeal (i.e. - NO gentrification).	Comments supporting Norwich Road noted. Whilst not part of the Central Shopping Area, Norwich Road is defined as a District Centre in the current Local Plan (2017). Nevertheless these comments will be considered in any review of the Central Shopping Area as part of the Local Plan review process.	25470
		Ipswich Community Media	The Suffolk Chamber of Commerce in Greater Ipswich Board supports the continued development of the Waterfront as a significant cultural and leisure hub and economic driver for the town.	Support for the Waterfront noted. The Waterfront is not part of the existing Central Shopping Area but this will be borne into consideration in reviewing whether the boundaries need to be amended as part of the Local Plan Review.	25167
		Suffolk Chamber of Commerce Ipswich Community Media CIC	Norwich road is the most vibrant road in the town centre. This should be celebrated and invested in. The group supports the idea of changing the axis of the town centre to draw it towards the waterfront. We believe that Westgate St after the Museum St junction and Carr St should be excluded from the Central Shopping Area. This would be to encourage more retail units in the streets towards the Waterfront and to allow a change of uses in the excluded streets to housing/leisure.	See response to Ref 25470 above. Comments noted. Suggestions on amending the Central Shopping Area will be considered in any revisions to the Central Shopping Area boundary that may be undertaken as part of the Local Plan Review.	25250 25312
		Conservative Group	We support the development of the town centre's retail offer but would also welcome innovative solutions to the challenges facing the retail sector including more creative use of vacant retail space and more consideration given to leisure and housing provision in the town centre.	Comments and suggestions noted.	25168
		Ipswich Limited	The Primary, Secondary and Specialist retail frontage designation doesn't work for Ipswich. The areas marked in the last local plan as Specialty should be Secondary, all Secondary areas should also be Primary with the exception of St Matthews Street.	Proposed change to the frontage designations noted and will be considered in the Local Plan Review.	25421
Q64: Should the Westgate site continue to be allocated for large-scale retail development or should other uses be pursued?		Ipswich Community Media	Like to know more about the Westgate plans.	The Council is currently working with a number of stakeholders to try and bring forward development but these discussions are still ongoing	25471
		Ipswich Central	New retail development within the Eastgate and Westgate Quarters should be abandoned once and for all. Any temptation for further out of town retail development should be resisted and replaced with a 'town centre only' policy. Failure to do this will continue to create confusion for potential developers, employers and other inward investment by retailers.	The Council must explore all options within existing site allocations and this includes encouraging retail where appropriate. This will be reviewed through a further Retail Study as part of the new Local Plan.	25090
		Ipswich Limited	Considering the borough has wrecked the top-end of Westgate Street (along with Carr Street) for its vision of making the town north to south (i.e. Cornhill to Waterfront), reduced the capacity of Crown Car Park and is planning on reducing car parking in the immediate area to this site, and has overcapacity Handford Road in close proximity, the infrastructure doesn't support such development on the Westgate site. I am sure this will become flats or just remain a car park. The Westgate site has the potential to become a major attraction within Ipswich. All possible uses should be considered, and it should not be just considered for retail usage. Currently the threshold for RfAs in the adopted Local Plan is 200 sqm for out of centre retail proposals. Asda considers that if this is to be increased at all then it should only be a modest increase. The requirement for retail impact assessments ensures an assessment of proposals, which are out with the Central Shopping Area and the District Centres, against the tests set out in the National Planning Policy Framework. This is vital to ensure that such proposals are correctly scrutinised and the relevant centres protected against unacceptable impact.	Comments noted with regards to car parking	25422
Q65: Should the threshold be changed? If you support a different threshold, please explain why.		Conservative Group (Cllr)	On behalf of Asda Stores Jigsaw Planning	Comments noted. The Council will seek to keep an allocation on the site which is flexible enough to respond to market demands. Comments noted	25313 24986
		Private individual	No - the importance of district centres has been reduced massively due to the growth of supermarket convenience stores (i.e. Sainsbury's Local), and closure of post office stores and smaller banks. Nacton Road District Centre is far too big, and there are duplicate stores opening up which will only take business away from other stores in the district centre, increasing the risk of such stores closing. What was a bank has been left empty for over a year. Nacton Road/Clapgate Lane/Raeburn Road are in competition with each other. The empty stores, kebab houses and off-licences do nothing for the area	Comments noted.	24671
Q66: Should we continue to protect all of the district centres?		Jigsaw Planning On behalf of Asda Stores	District Centres play a vital role within the retail hierarchy providing core facilities to the communities which they serve. Asda support the continued protection of the Stoke Park District Centre in the forthcoming LDF. The Asda store forms part of the District Centre along with a dentist, pharmacy and newsagent. The existing Local Plan (paragraph 9.123) states that District Centres are the more strongly performing centres and rely on a stronger convenience retail offer to underpin their function, vitality and viability. The Stoke Park Centre continues to meet this role and its continued allocation as a District Centre is appropriate.	Support for continued retention and performance of the Stoke Park District Centre noted.	24874
		Conservative Group	We should protect and promote local retail centres as far as possible. Encouraging use of the sites has extensive community benefits and is excellent for the environment by reducing car travel times.	Support for district centres and their benefits acknowledged.	25314

	Q67: Should we be planning for the expansion of any of the district centres, if so where?	On Behalf of Aquigen	There are no immediately available opportunities to the south and west of Ravenswood District Centre to support a viable extension. In the absence of this, affording the opportunity for a 'de facto' extension to the east of Nacton Road would have the particular benefit of enhancing the complementary relationship which already exists with Futura Park and promoting mutually beneficial linkage.	Recommendation to extend to the east of Futura Park noted. Any extension to the east will fall within the jurisdiction of Suffolk Coastal District Council and will need to be jointly planned accordingly if taken forward.	25108
	Q68: Should we continue to protect all of these local centres? Do they still provide the function intended of them? Do any need re-allocating to different uses, or extending?	On Behalf of East of England Co-operative Society	Prince of Wales Drive - The site is currently defined as Local Centre 39 under Policy DM21. Marketing of the site for retail uses has demonstrated that there is no demand for retail use in this location and that such use is not economically viable. In order to secure beneficial alternative use it is proposed that the Local Centre designation should be removed and reallocated to enable comprehensive redevelopment for residential purposes.	Comments on status of Prince of Wales Drive Local Centre noted. Whilst it is acknowledged that the retail uses have been marketed without success, the NPPF (2018) paragraph 92(a) requires planning policy to plan positively for the provision of shared spaces, community facilities (including shops) and other local services to enhance the sustainability of communities and residential environments. Current policy DM21 of the Local Plan does provide a degree of flexibility in terms of A1 to community facilities and residential uses provided that appropriate marketing has been done. Notwithstanding this, the recommendation will be considered as part of the Local Plan Review.	25381
	Q71: Do you agree with the approach taken to protecting pubs? If not, what measures would you like to see put in place?	Private individual	A categorization system could be used to show pubs that should be retained at all costs, those that should be retained using the current approach and those that should be used for housing. Certain pubs in Ipswich do nothing for the area apart from promoting crime and disturbance. Does Ipswich need all of the Social Clubs? Surely some of these could be incorporated into each other to provide space for housing??	Comments noted, the National planning policy recognises that public houses, along with other community facilities, enhance the sustainability of local communities and should be safeguarded and retained for the benefit of the community while allowing them to develop and modernise in a sustainable way. The Council is committed to protecting public houses which are of community, heritage or townscape value through policy DM23 (Protection and Provision of Community Facilities).	24672
Tourism	Q72: How can Ipswich continue to increase its offer as a tourist destination?	Conservative Group Ipswich Community Media	No, the market should determine whether a business is viable. There is a shocking absence of visual and contemporary arts. I am finding myself travelling to Bury, Cambridge and most usually Norwich for any whiff of contemporary arts. When the gallery was sadly taken from the college and eventually became a gallery - people thought, oh well, at least there would be life here. But having shows last 10 months, having a sterile silence and utter lack of challenging arts and visual work is sad. Support a growing arts and music centre and WET arts studios hubs! They DO bring in revenue!	Comments noted. The value of the Arts in helping to create a sense of place and community is understood. Although the Council has removed its "Public Art" policy DM7, the Council is working to promote arts and culture in the town through policy CS14 (Retail Development and Main Town Centre Uses).	25315 25472
		The Theatres Trust	Cultural facilities include your theatres, live music venues (include public houses), community spaces, museums, cinemas, libraries and other public and performance venues and are important in supporting the local/visitor economy by attracting people to centres where other businesses benefit from the flow on effects. Local plans should therefore support arts/culture at all levels to support the local economy and ensure that all residents/visitors, have access to cultural opportunities. Policies should protect, support and enhance cultural facilities and activities, particularly those which might otherwise be traded in for more commercially lucrative developments, and promote cultural led development as a catalyst for regeneration.	The value of cultural facilities in supporting the local economy is acknowledged. The Council is committed to improving leisure, arts, culture and tourism in the town through policy CS14 (Retail Development and Main Town Centre Uses).	24997
		Suffolk Preservation Society	SPS promotes investment in the historic environment as a major regeneration tool which in turn can be used to attract visitors.	We promote the use of heritage assets and local character as a catalyst for regeneration and to strengthen the sense of place. Ipswich is committed to preserving and enhancing its heritage assets through policy CS4 (Protecting our Assets) and policy DM13 (Built Heritage and Conservation).	24705
		Suffolk Chamber of Commerce	We feel that the visitor experience in the town centre would be enhanced by: more trees and planted areas; an increase in sitting areas; more town centre to Waterfront pedestrian and cycle routes; and more public toilets. Our highest priority would be to establish a high quality music venue, upon the lines of the Apex in Bury St Edmunds, with a capacity of around 350 / 400 possibly with a dance area. Likewise one or some of the de-commissioned churches in the borough, with good acoustic facilities, might both 'bridge the gap' and preserve an historic building. Other potential tourism attractions, building on Ipswich's key assets, should be developed or enhanced in town centre locations for example: Ipswich Transport Museum, BT Innovation zone, Maritime Museum; and an Ipswich Arts Centre upon the lines of St Mary's Arts Centre in Colchester.	The Council is working to green the streets of Ipswich through policy DM10 (Protection of Trees and Hedgerows). Similarly, a key objective of the Council is to improve accessibility between the Central Shopping Area and the Waterfront/Wt Dock. Regarding Ipswich's tourist offer, the Council promotes leisure, arts, culture and tourism in Ipswich through policy CS14 (Retail Development and Main Town Centre Uses).	25169
		Private individual	It needs to preserve its heritage assets somewhat better than it has to date. I am saddened every time I walk past the Gateway to Wolsey's College.	Ipswich is committed to preserving and enhancing its heritage assets through policy CS4 (Protecting our Assets) and policy DM13 (Built Heritage and Conservation).	24735
		Private individual	By joining the In Bloom movement. We have lots of old buildings - with flowers they could look a lot prettier.	Comment noted. The Council is working to green the streets of Ipswich through policy DM10 (Protection of Trees and Hedgerows).	24751
		Ipswich Community Media CIC	Promote the cultural and the cool.	Comments noted. The Council is working to promote leisure, arts, culture and tourism in the town through policy CS14 (Retail Development and Main Town Centre Uses).	25251
		Ipswich Limited	Before we can answer this question we must find out who can deliver marketing activities to better increase tourists and day visitors into the town. Proposed Tourist Attractions 1. County Hall should be utilised as a Museum 2. Old Post Office is an ideal place for an Art Gallery 3. Ancient House should be utilised as a Museum 4. A tourist attraction needs to exist at the Ipswich Waterfront Increasing the selection makes it impossible for the visitor to complete all the museums on a single day, so visitors would need to stay overnight/visit. "The Link" route from Tower Street to Waterfront should be revisited as a tourist/heritage trail. Pigs Gone Wild art trail and children-focused events such as Paw Patrol attracted large numbers of people into the town. The latter category are easily organised and Ipswich should utilise more of these events, i.e. once per week in the summer.	Comments noted. The Council is working to promote leisure, arts, culture and tourism. The Council is working with Ipswich Central, landowners and other partners to bring vacant premises in the town centre back into active use and introduce a scheme to make vacant premises look more attractive.	25423
		Conservative Group	Lots of ideas already outlined promote Ipswich as a cultural and leisure hotspot which in turn would increase tourism.	Comment noted, the Council is committed to promoting leisure, arts, culture and tourism in Ipswich through policy CS14 (Retail Development and Main Town Centre Uses).	25316
		Private individual	Better shops in the town centre.	The Council is continuing to promote high quality investment and development in Ipswich Central Shopping Area.	25515
	Q73: Do you consider the range of hotels in the town offers the appropriate mix and choice to visitors?	Private individual	Overall yes. Another Travelodge near the train station as planned will be good. Another up market hotel to rival the Sall House would be a welcome addition to encourage more tourists to Ipswich.	Comment noted.	24673
Climate Change and Flood Risk	Q74: How can we adapt to pluvial flooding through design?	Ipswich Central	Additional reasons to visit and stay, including additional hotel space and attractions, must be planned for.	Comment noted. The tourism sector is a significant sector in Ipswich and will be supported through the Local Plan.	25095
		Suffolk County Council SCC	Flood risk should be mitigated wherever possible via the use of SuDS and other water management features as outlined in the SCC Flood Risk Management Strategy (SFRMS). The County Council seeks inclusion of a requirement for new development of all scales to incorporate sustainable drainage systems into their design in line with the details contained within the SFRMS and any area specific Surface Water Management Plans (SWMP). It is recommended that the new Local Plan refer to the mitigation of surface water flooding and reference the protection of the water quality of watercourses. SCC would also welcome measures which increase water efficiency, such as water butts.	The recommendations outlined by SCC are welcomed and will be factored into the review of relevant development management policies as part of the Local Plan Review.	25439
		On behalf of RSPB	The RSPB fully supports a co-ordinated, planned approach to the implementation of SuDS. SuDS need to be incorporated at the earliest stage of the planning process, be on or near the land surface and delivered in broad partnership to the satisfaction of the end user (residents). Their effectiveness should also be monitored. In conjunction with the Wildfowl and Wetlands Trust (WWT), we have produced a report on this subject (Graham/Day/Bray/Mackenzie - Sustainable Drainage Systems - Maximising the potential for people and wildlife: A guide for local authorities and developers).	The comments of the RSPB are noted and will be considered as part of the Local Plan Review in formulating relevant policy reviews. IBC appreciates being made aware of the WWT report which should be helpful as part of the Local Plan Review process.	24687
		Suffolk Chamber of Commerce	Clearly a lot of money had been spent on the current flood defence scheme; is the scheme sufficient for future needs or does it need to be extended further down river?	Appendix 5.04 of the Level 2 Strategic Flood Risk Assessment shows the tidal flood barrier with an anticipated failure date of 2115. Paragraph 9.11 of the Development and Flood Risk Supplementary Planning Document (2014) demonstrates that flood frequency at 2110 with the barrier in place is anticipated to be sufficient. Flood risk and defence will continue to be monitored as part of future Local Plan reviews, in liaison with consultees such as the Environment Agency, to ensure that flood defences for the future are managed.	25170
		Suffolk County Council SCC	Q74 reads "SuDS are designed to reduce potential of new and existing developments with respect to surface water drainage." It should say SuDS are designed to manage runoff from new developments, reducing damage from flooding, improving water quality, protecting and improving the environment, protecting health and safety and ensuring - SuDS definition Floods and Water Management Act. IBC have endorsed The Suffolk Flood Risk Management Strategy, this provides guiding principles for SuDS in Suffolk. Appendix A provides guidance on SuDS designs and describes associated National Planning Policies/Guidance. Early consideration of spatial/location requirements for SuDS in the planning process is essential.	Commentary from SCC and suggested re-wording of question is helpful. The Local Plan review process will ensure that SuDS are integrated correctly into any planning policies that are reviewed.	24921
	Environment Agency	There is no mention in this section of the fluvial flood risk from the River Gipping, nor of the residual tidal risk remaining from the overtopping or breach of flood defences. Both of these sources of flood risk may need to be addressed by developers in their FRAs. The Local Plan should consider a local policy defining what development would be considered accessible in areas at risk of flooding. This would provide clarity and enable developers to understand what could be considered safe. We would welcome discussion with you to create such as policy.	Comments from Environment Agency useful and noted. Suggestion of defining what development is acceptable in certain areas at risk of flooding will be considered in Local Plan Review.	25338	
	Conservative Group	Ensure suitable drainage and sewerage infrastructure is in place before a development takes place rather than by the time it is completed.	Comments noted.	25317	
	Q75: What is your experience of SuDS? Are they successful and an efficient use of space? What is their main benefit?	Suffolk Wildlife Trust	SuDS can have not only a flood risk benefit, but can also be of benefit to biodiversity. All SuDS schemes should be designed with this dual benefit in mind, to maximise the opportunities for wildlife within new developments. Guidance on designing SuDS to benefit wildlife has been produced by the RSPB and WWT1 and provides examples of how their potential can be maximised for people and wildlife.	Comments from Suffolk Wildlife Trust noted and importance of biodiversity benefits of SuDS acknowledged. IBC will bear the guidance referenced in mind when reviewing relevant policies.	25020

<p>What is the long-term effectiveness?</p>	<p>On behalf of RSPB</p>	<p>This report (Environmental Policy Consulting - Sustainable Drainage Systems on new developments: Analysis of evidence including costs and benefits of SuDS construction and adoption, Final Report For the Welsh Government January 2017) sets out the significant economic, social and environmental benefits of SuDS. Including: * capital cost saving of £9000/home * Improve water quality and protect drinking water resources * Limit flows entering systems and therefore maximise network capacity * Improve health and wellbeing * Help manage air quality * Increase property value * Enhance biodiversity * Provide education * Improve thermal comfort * Provide amenity and recreation</p>	<p>Comments and summary noted.</p>	<p>24693</p>
	<p>The Woodland Trust</p>	<p>The plan should recognise the role trees/woods can play as part of SuDS. Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The FC's publication, The Case for Trees (2010) explains how: 'the capacity of trees to attenuate water flow reduces the impact of heavy rain/floods and can improve the effectiveness of SuDS'. Trees can help reduce surface water flooding in urban situations too, regulating the rate at which rainfall reaches the ground. Slowing the flow increases infiltration and the ability of engineered drains to take away excess water.</p>	<p>The comments regarding the role that trees/ woods can contribute towards SuDS is noted and will be integrated into the review of the Local Plan where necessary and relevant.</p>	<p>24898</p>
	<p>Suffolk County Council SCC</p>	<p>Ravenwood is a clear example of successful SuDS. Many others exist. see SUSDRAIN web site and many other references in our SuDS Guide.</p>	<p>The positive feedback of Ravenwood is welcomed.</p>	<p>24920</p>
	<p>Environment Agency</p>	<p>The Plan refers to SuDS as a means of surface water drainage. IBC should liaise with Suffolk County Council (as Lead Local Flood Authority) on potential opportunities to reduce and manage surface water flooding. We support the use of SuDS to help to prevent the pollution of groundwater and surface water, provide aquifer recharge and to provide ecological and amenity benefit. In addition to managing flood risk, it should also be ensured that appropriate measures for maintaining SuDS are put in place. SuDS should be integrated into schemes at an early stage and designed to provide maximum benefits without causing adverse impacts. Deep infiltration systems should be a last resort option for disposal of surface water. Appropriate pollution treatment steps must be in place (CIRIA C753).</p>	<p>IBC will endeavour to liaise with SCC as part of the Local Plan review process to reduce and manage surface water flooding. The additional information on the value and needs of SuDS is useful and will help inform the Local Plan Review where applicable.</p>	<p>25182</p>
<p>Q76: What measures do you consider can be introduced into urban areas to address climate change?</p>	<p>Suffolk County Council SCC</p>	<p>The Suffolk Climate Change Action Plan (SCCAP), published in March 2017, identifies four key themes which are: A Business and Community Resilience; B Business Energy Efficiency and Renewables; C Community Energy, and D Domestic Energy Efficiency. The Borough Council should consider this strategy and the extent to which planning policies can contribute to realising its objectives. The County Council would welcome measures which increase water efficiency, such as water butts.</p>	<p>The Council has dedicated policies to protect against climate change and is working with neighbouring authorities on a Water Cycle study which will look to increase water efficiency.</p>	<p>25440</p>
	<p>Historic England HE</p>	<p>Include a specific policy relating to the inclusion of renewable technologies within Conservation Areas and with regard to historic buildings and the wider historic landscape. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. The policy should seek to limit and mitigate any such cost to the historic environment. Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. See also Historic England guidance: https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-pf/</p>	<p>Comments noted</p>	<p>24941</p>
	<p>Suffolk County Council SCC</p>	<p>More rainwater harvesting, simple measures such as water butts, or perhaps not permitting developments which have long term requirements for pumps for drainage. Open landscaped/vegetated SuDS.</p>	<p>Comments noted</p>	<p>24919</p>
<p>Q77: How can we encourage new developments to reduce carbon emissions and be climate change resilient? Should we require development to meet higher standards of energy efficiency and lower levels of water usage?</p>	<p>Mersea Homes</p>	<p>We have consistently argued that sustainability targets within the Ipswich administrative area have failed to reflect the viability of development and are incompatible with the approach and standards set out by government. Unrealistic targets do not, in our view, provide an effective basis for securing compliance. Where government sets out a clear approach to standards - as is the case with Building Regulations - the Council should adopt those standards as its mandatory requirement, and encourage enhanced performance rather than establish that as policy.</p>	<p>Concerns for scheme viability is noted, however, the NPPF has encouraged the inclusion of local plan policies that support the government's stance on climate change and emissions.</p>	<p>25490</p>
	<p>On Behalf of The Kesgrave Covenant</p>	<p>As per our response to Question 34, the Council's policies need to be in line with national planning policy advice in respect of water consumption and energy efficiency. If the Council wish to encourage developers to pursue higher standards voluntarily, then in practice this may mean adopting greater flexibility on other development standards/requirements to encourage that to happen. For example, the Council could investigate a lower CIL rating for developments achieving certain standards.</p>	<p>The Council will continue to review the need to engage a tariff based approach to the delivery of infrastructure. The Council's environmental objectives include the preservation of water supplies as a part of the delivery of sustainable development anticipated in NPPF149</p>	<p>24889</p>
	<p>Environment Agency</p>	<p>We support the consideration on water efficiency for new development. The Environment Agency 'water stressed areas - final classification' report, July 2013, identifies the entire area as being under 'serious stress' and over time pressures from changing weather and population growth are likely to increase. As well as supporting the natural environment, water resources are critical to sustainable economic growth and housing development.</p>	<p>Support welcomed</p>	<p>25184</p>
<p>Q78: What measures should be encouraged to provide renewable and low carbon energy development within Ipswich?</p>	<p>Mersea Homes</p>	<p>Whilst we recognise that all opportunities for achieving low carbon energy development should be considered, there is no basis for mandating such opportunities beyond nationally prescribed standards.</p>	<p>Para149 of the 2018 NPPF asks councils to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.</p>	<p>25491</p>
	<p>Private individual</p>	<p>Low carbon is not just about the number of CO2 emissions, it is a symbolic idea of a behavioural change and a sustainable way of living. Energy is important, but a low carbon strategy that will address climate change needs to consider what a low carbon landscape means. This also includes history, culture, environment, interest and engagement of the visitors and also activities to support the economic development of the area. Low carbon landscape is so much more than energy and transport, it is a different way of seeing.</p>	<p>Comments noted - the Council remains committed to reducing the impact of future development on the environment.</p>	<p>24801</p>
<p>Design Q79: What in your opinion makes a well-designed development? Do you feel that high quality design is being delivered in Ipswich?</p>	<p>Ipswich Community Media</p>	<p>We all here passionately believe that design and style can bring people to a town and ALSO bring people down, the terrible new redesign of the back of the tower ramparts proves that. Maintaining our heritage and trying best to keep old buildings bring them back to life or utilise whilst empty is paramount - but we only need look to some of the greatest venues or clubs to understand that you can also bring energetic life to a place. There's a wealth of good creativity here in this town that seem to be underused.</p>	<p>The Council will publish its Supplementary Planning Guidance for the Public Realm. The NPPF 2018 has also given the Council the opportunity to take a stronger line on design in its development management processes.</p>	<p>25473</p>
	<p>Suffolk Wildlife Trust</p>	<p>High quality design should maximise the ecological value of sites, by retaining and enhancing existing features and creating new ones. This can include the use of green roofs and landscape planting to aid connectivity, permeable boundaries to allow hedgehogs to move through the site, integrated roosting opportunities for bats and integrated nesting opportunities for birds such as swifts.</p>	<p>Comments noted and supported.</p>	<p>25021</p>
	<p>Suffolk Preservation Society</p>	<p>SPS considers that high quality design that creates a strong sense of place while contextually sensitive. While there are some examples of exceptional design in Ipswich (Willis Building) much of the recent residential development lacks distinction and makes at best, a neutral contribution to the identity of the town.</p>	<p>The NPPF 2018 provides support for Councils to deal more firmly with design issues and encouraged the preparation of design codes to improve standards. When coupled with Public Realm improvements promoted by the Council's emerging SPD the Council anticipates a period of improved design standards generally.</p>	<p>24706</p>
	<p>Historic England HE</p>	<p>We strongly encourage provision for the historic environment throughout the plan, not solely within heritage focused policies. We particularly seek a specific requirement for consideration of the historic environment within the design policies of the local plan which should seek to draw on opportunities offered by the historic environment and reflect local character and distinctiveness. This should not stymie contemporary development but should require an appreciation of the significance and character of the historic environment in producing a high standard of design. We would also welcome this in relation to tall buildings policy that may come forward in the plan.</p>	<p>Please see comments above. The tall buildings policy has been removed from the policies in favour of a more broadly based set of design policies and SPD which combined with NPPF policy should improve the design standards in the borough.</p>	<p>24942</p>
	<p>Suffolk Chamber of Commerce</p>	<p>We strongly recommend that every attempt is made through the Plan and the planning processes to ensure that new developments contribute positively to, and help to drive up, the quality of the built environment. More iconic rather than simply utilitarian design would enhance the image of Ipswich and its attractiveness to investors and visitors alike.</p>	<p>As above</p>	<p>25171</p>
	<p>Private individual</p>	<p>Developments may be well designed in the first instance but the Council desperately needs to ensure that new developments are kept in a good state of repair. The social housing scheme off Hawes Street is a dump compared to the architects designs - the render is in an awful condition, building on the waterfront still hasn't been repaired after a storm a number of years ago. The Sir Bobby Robson bridge is covered in green algae. Better quality wooden cladding should be used as relatively new developments are beginning to look tatty because poor quality cladding is rotting.</p>	<p>Concerns noted for the quality of materials used. Improved design sought as above.</p>	<p>24674</p>
	<p>Suffolk Constabulary</p>	<p>A balance between the principles of Secured By Design, sustainable development and good architectural design.</p>	<p>Comments noted</p>	<p>24852</p>
	<p>Suffolk County Council SCC</p>	<p>I would suggest guidance on dwelling sizes, floor area, building height, garden size and open spaces, as well as densities, should be provided and followed when making allocations to individual sites. The guidance should also take into account spaces needed for appropriate SuDS and needs to avoid significant flood risk areas - i.e. taller dwellings and more open space would mean more space for SuDS is available.</p>	<p>Comments noted</p>	<p>24918</p>
	<p>Ipswich Community Media CIC</p>	<p>Sailmakers is an example of appalling design. Future improvements to design must be made - we have to up our game.</p>	<p>Comments noted</p>	<p>25252</p>
	<p>Ipswich Limited</p>	<p>Those running our town shouldn't be afraid of Ipswich becoming more city-like and should actively encourage it. Why not allow the town centre to have more beautiful modern buildings? All noticeable examples over the last 10 years or so are on the outskirts of town!</p>	<p>Comments noted</p>	<p>25432</p>
	<p>Suffolk Fire & Rescue Service</p>	<p>The Ipswich Local Plan needs to establish a framework which creates 'safe and accessible environments' (as set out in paragraph 69 of the NPPF). Fire safety is a relevant consideration, in respect of infrastructure needs, access by services to new development and water supply. Suffolk Fire and Rescue Service (SFRS) undertakes an Integrated Risk Management Plan (IRMP) every 3 years to evaluate the risks within our area and our response to them. Any large scale development would also be evaluated at the planning application stage. At the present time it is not envisaged that the scales and distributions of development in the emerging local plans would impact significantly on our emergency response, however, this would be kept under review using our IRMP process and may change due to specific developments in the future. SFRS encourages the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but if incorporated into the design/build stage it is extremely cost effective and efficient. SFRS will not have any objection with regard site access to specific developments, as long as access is in accordance with building regulation guidance. There will of course need to be adequate water supplies for firefighting, specific information as to the number and location can be obtained from our water officer via the normal consultation process.</p>	<p>The suggested promotion of sprinkler systems in the design of schemes is appropriate for inclusion in the supporting text, as it is not usual for the Local Plan to restate the contents of Building Regulations in policy. The Council uses the following "informative" clause which can be attached to relevant planning decision notices. It states: " Ipswich Borough Council supports the use of automatic sprinkler systems." As the Council wishes to be supportive of the Fire Service in encouraging the use of sprinkler systems a commentary is suggested that will be added to supporting/ explanatory text.</p>	<p>25498</p>
	<p>Private individual</p>	<p>Stop reducing light to existing residents by doing away with high-rise. Sunlight helps all.</p>	<p>Comment noted - The Tall building policy has been removed and will be replaced by a set of policies that seek to control design in a manner that is relevant to an individual site.</p>	<p>25504</p>

Q80: Should Building for Life 12 continue to be used as a tool to improve the design quality of new development?	Mersea Homes	As with other policies which seek to establish minimum standards, central government sets nationally applicable standards, and these should be reflected in policy. Where the Council wishes to encourage higher standards, it should only do so fully recognising the viability implications of those additional aspirations. In that context, we do not think that the Building for Life should be set as a policy target.	NPPF support for design codes has increased. Para 129 refers to "assessment frameworks such as Building for Life and remind that they are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments". The effect of the requirement should mean that expected design standards for development in the IBC plan area can be reflected throughout both viability and valuation exercises that surround the development process from scheme inception.	25492	
	Suffolk Preservation Society	SPS supports the use of Building for Life 12.	Support welcomed	24707	
	Suffolk Constabulary	Suffolk Constabulary supports the objective of Building for Life 12 to create a development that is safe and provides everything expected for a new community.	Support welcomed	24853	
Q81: Do you think the tall buildings around the Waterfront enhance the vibrancy of the area? Are there other areas of the town where additional tall buildings (of appropriate construction standards) would be appropriate?	Ipswich Community Media	Keep the wine rack as a monument - a piece of sculpture somehow it speaks for our time?	The Council notes that construction on the winerack has since re-started.	25474	
	Suffolk Wildlife Trust	The vibrancy of tall buildings could be enhanced through the inclusion of swift nesting opportunities integrated into the fabric of the buildings. Such buildings provide ideal opportunities for swift nest boxes and can play a significant part in swift conservation.	The Councils Design and Open Space guidance encourages wildlife home features to be incorporated into buildings, including swift bricks.	25022	
	Suffolk Preservation Society	Yes. We support tall buildings (not exceeding 7 storeys) where they are of a very high standard of design and they do not cause harm to the setting of designated heritage assets.	Comments noted. The Council supports tall buildings in appropriate locations however it is committed to ensuring that tall buildings do not harm the character and appearance of the historic environment.	24708	
	Historic England HE	The Waterfront, by the nature of the existing historic warehouse buildings, can potentially incorporate buildings of a more industrial scale and height. However, new additions along the Waterfront are of mixed success. Those truly tall buildings have had a significant impact on the skyline and nearby designated heritage assets. We are concerned that further tall buildings will cumulatively be severely harmful to Ipswich's historic environment. There is unlikely to be scope for additional tall buildings elsewhere in Ipswich's historic core and, owing to its topography, buildings at the edge could still have an impact looking out from the town centre.	The Council understands the impact that any further tall buildings across the Waterfront may have on existing heritage assets and this will be considered as part of any future planning applications for development in this location.	24943	
	On behalf of RSPB	Tall buildings around the waterfront which have integrated swift-bricks within them will undoubtedly increase the vibrancy of the waterfront area. Swifts have declined by 51% since the mid-1990s. They are the fastest bird in direct flight. Only landing to nest. They are the epitome of "vibrant". The RSPB in conjunction with Barretts has worked with Manthorpe building products and Action for Swifts to design and produce a low-cost integrated swift-brick (c.AE20)	Comments noted	24754	
	Ministry of Defence MOD	The MODs principle concern relates to ensuring that tall structures especially tall buildings do not cause an obstruction to air traffic movements at MOD aerodromes or compromise the operation of air navigational transmitter/receiver facilities located in the area. As you will be aware air traffic approaches and technical installations at MOD aerodromes are protected with statutory safeguarding zones which identify height consultation zones in the area surrounding MOD aerodromes relative to topography and distance from the site (s).	Comments noted	24814	
	Private individual	Decrease the number of high-rise buildings around the town and number of pointless office blocks standing empty for many years.	Comments noted	24836	
	Private Individual	I doubt tall buildings have enhanced the vibrancy of the area, particularly where development has stalled.	The Council notes that Tall buildings can provide an important contribution to the landscape and townscape of Ipswich and also that the winerack has since re-commenced construction.	24782	
	Ipswich Limited	The tall buildings didn't really take off. Tall buildings do not suit Ipswich. Whether we are talking office blocks or residential, there has always been a struggle for occupancy in the town.	Comments noted	25424	
	Private Individual	No more high rise buildings.	Comments noted	25501	
Q82: Do you feel more protection should be given to street trees? Do you have specific examples of trees which should be protected?	Suffolk Wildlife Trust	Street trees should not only be protected, but should also be managed to maximise their biodiversity value in the long term. It should also be ensured that new and replacement trees are planted so that the current target of 22% cover by 2050 (in policy DM10) is met.	Comments noted, the Council is committed to meet it's 22% canopy cover target by 2050.	25023	
	Northern Fringe Protection Group NFPG	Yes. It is too easy to bypass TPOs. Like for like planting needs to be enforced and a 2 for 1 replacement required for new developments.	The Council does insist on 2 for 1 replacement planting	24987	
	Save our Country Spaces SOCS	Yes. It is too easy to bypass TPOs. Like for like planting needs to be enforced and a 2 for 1 replacement required for new developments.	The Council does insist on 2 for 1 replacement planting	25050	
	On behalf of RSPB	The RSPB commends IBC for having a specific policy on street trees. This policy should look to enhance the existing network and not just consider their protection. We reference the following report - Forest Research (2010). Benefits of green infrastructure. Report to Defra and CLG. Forest Research, Farnham. Benefits of trees - provide clean air, reduce contaminants, reduce flooding, aesthetically pleasing, reduce "heat island", effect, support and connect wildlife and in particular the Ipswich Wildlife Network.	Comments noted	24755	
	Private Individual	The council should look to have more hedges rather than trees. Hedges have been shown to reduce pollution in urban areas much better than trees as it traps the pollutants at a lower level. Trees require pollutants to travel past head height which means that the pollutants are likely to be breathed in by the population before they are taken in by the trees.	Comments noted	24675	
	Private individual	Yes, trees and green areas in general should be protected and cared for. I was disappointed when a cluster of Elder trees were removed near my flat. There are so few trees near the town centre and these trees provided a habitat and source of food for birds and other wildlife.	Comments noted	24738	
	Ipswich Community Media CIC	Yes!	Comments noted	25253	
	Conservative Group (Clr)	Street trees should be protected in all cases and we should encourage the planting of far more trees within the Borough as they undeniably add to the fabric of the area and have social and environmental benefits.	Comments noted	25318	
	Suffolk Preservation Society	We support the concept that gateway buildings should be of a very high standard of design however we would promote high standards of design in all sensitive townscape locations.	The revised NPPF will help raise design as a key feature of development proposals.	24709	
	Historic England HE	Variety and repetition in buildings in response to area and function are key in building a cohesive town. Buildings are critical in wayfinding and encouraging people to explore and feel comfortable in an area. As such, buildings at critical locations in Ipswich should have greater attention to their architectural design. This does not mean that a proliferation of landmark buildings are required but that consideration to form and function, both as a building and in a streetscape, is essential.	As above	24944	
Historic Environment	Q84: What could be included in a positive strategy in the Local Plan to protect and enhance heritage assets?	Ipswich Community Media	Great questions - so we pay NO heed really to the strength of the heritage - maybe a stronger trail? Arts / murals - to support this (look to the mission or other areas in san fran to see how tourists love a good bit of street art! I was in east London Saturday and saw 7 groups of TOURS of street art!) could be celebrate our writers, artists, merchants in a more innovative way?)	Noted. The Council recognises the value of public art and the contribution it makes to the public realm. We promote the use of heritage assets and local character as a catalyst for regeneration and to strengthen the sense of place.	25475
	Suffolk County Council SCC	Policies should identify a means of ensuring that development protects and provides for enhancement of heritage assets, both on-site and cumulatively, at a strategic level, with integration into master planning and briefs and strategies for 'quarters' or 'opportunity areas'. The plan should clearly set out strategic and development management policies that ensure that the local and national/international significance of heritage assets can be understood in decision-making processes. The plan should have Development Management policies relating to different types of heritage asset (both built and below ground). The policy framework should be set out in such a way as to link heritage assets to the different objectives they support, and consideration of the historic environment should be integrated through the plan.	The Council will strengthen the protection of and seek to promote improvement to heritage assets through its strategic and development management policies and conservation area management appraisals. Separate policies relating to both built and below ground heritage will be proposed under the new plan.	25438	
	Suffolk Preservation Society	a clear requirement for a Heritage Assessment should be included within the council's heritage policy in order to fully understand the significance of the asset and any changes impacting on it.	Noted.	24711	
	Historic England HE	Ideally the strategy should offer a strategic overview including overarching heritage policies to deliver the conservation and enhancement of the environment. A good strategy will offer a positive holistic approach throughout the whole plan whereby the historic environment is considered not just as a stand-alone topic but as an integral part of every aspect of the plan. It will also be spatially specific, unique to the area, describing the local characteristics of the borough and responding accordingly with policies that address the local situation. See original for comments on the approach to site-specific policies also.	Noted. The Council is committed to conserving and enhancing its heritage assets through its strategic and development management policies. In addition Conservation Area Appraisal and Management Strategies, recognise the importance and quality of individual areas .	24945	
	Private individual	Ipswich has a rich history, it has some of the finest buildings in the country and I am not referring to some of the so called high spec buildings built since the 60s. It's time to shout about our history and build on it. We are not a London over spill. Suffolk is built on hard work and graft it is not based on pie in the sky. The town should serve the county. It would be great to see both the council and the county council work together to keep Ipswich together.	Noted. As per policy DM13 the Council intend to refuse proposals which result in the harmful loss of heritage assets.	24837	
	Suffolk Constabulary	Please refer to comments on DM8 above where greater emphasis is given to security in order to protect heritage assets as risk of damage through criminal behaviour. Also to ensure anyone living or working in such buildings is afforded the flexibility on security to ensure that inhabiting the building is viable, to prevent empty buildings which often then become a target for criminal and anti-social behaviour.	The Council encourages consideration of the principles of Secure by Design where appropriate.	24854	
	Suffolk Preservation Society	The existing use of Article 4 Directions in conservation areas, together with appraisals and associated management plans, are appropriate measures but rely on regular review and strict application of the adopted guidance.	Noted. The Council is committed to regularly reviewing its conservation area appraisals, which are treated as a material consideration in all planning decisions.	24712	
	Historic England HE	The local plan process provides a basis for the continued update and management of Conservation Management Plans, identifying each conservation area's local identity and distinctiveness. These should identify features that typify and contribute to this special distinctiveness as well as allow for less tangible judgments of character, quality of place and special distinctiveness. The plan will be more robust where it directs future development to take account of the special, distinctive character of Conservation Areas. Review the conservation area appraisals and boundaries for both Central and Wet Dock as part of the evidence base, and consider using Article 4 directions.	Noted, currently policy DM8 Heritage and Conservation failed to reference the adopted Conservation Area Appraisals and Management Plans.	24946	
	Historic England HE	We recommend a review of the conservation area appraisals and boundaries for Central and Wet Dock Conservation Areas, to ensure that historic Ipswich is understood and can inform the 21st century Ipswich which is emerging. This would include incorporating the archaeological information coming forward. Once an updated baseline of understanding is established, Article 4 directions could be considered to prevent erosion of character and quality in the conservation areas. We would also welcome provision for any future designation of conservation areas within the Borough as well as specific provision for the landscape setting of different parts of the area.	Noted, the Council is currently reviewing its Conservation Area Appraisals and boundaries including for the Central and Wet Dock Conservation Areas.	24947	
	Q87: How could our archaeological assets be protected?	Historic England HE	We welcome specific provision for the protection and enhancement of archaeology and emphasis that sites of archaeological importance can occur everywhere. Give clear guidance on expectations for archaeological recording and the submission of records with an appropriate public record for archaeological remains that are not retained in situ. Where suggested sites are located in areas of known archaeological potential, give weight to this as a consideration in site selection. Liaise with the County Archaeologist at site allocation stage. Emphasise in policies and supporting text that the setting of heritage assets should be considered holistically as part of the historic environment.	The Council will produce an Archaeology SPD to further enhance protection of the borough's archaeological assets.	24948

	Ipswich Archaeological Trust IAT	On the whole, the town's archaeological assets have been well-protected by the planning policies. However, some nationally important sites, excavated on the waterfront, have not been analysed and brought to archive or publication following the bankruptcy of the developers. The costs of excavating some of the more complex sites has rendered their development unprofitable. Serious consideration should be given to how the Local Plan Policies can be used to ensure that the necessary funds are available. One option would be to create the fund through an archaeological levy on ALL future planning consents or the use of the existing CIL.	Comments noted. The Council does not currently have CIL implemented and an Archaeology Levy is not a viable solution.	25258	
Q88: How can Ipswich better utilise its heritage assets and archaeology?	Historic England HE	We welcome the forthcoming SPD on archaeology. As mentioned before, the heritage assets (including archaeology) should be integrated into the development of policy for the vacant sites and regeneration areas in Ipswich. Understanding the importance of the remains, particularly in the Waterfront area, should influence the modern design solutions coming forward. As such we particularly recommend a review of the conservation area appraisals and their boundaries for both Central and Wet Dock as part of the evidence base for the new local plan to ensure that historic Ipswich is understood and can inform the 21st century Ipswich which is emerging.	The Council comments that the Archaeology SPD is underway and a review of the Conservation Area appraisal and their boundaries is also taking place.	24949	
	Suffolk Chamber of Commerce	We believe that much could be done to make more of the historic assets of Ipswich, which are not much or very effectively exploited for tourism and educational purposes. More could be made for example through improved displays and interpretation of: Christchurch Mansion; Ipswich's Anglo-Saxon heritage and associated archaeology; our industrial past; and Wolsey's Gate.	Comments noted	25172	
	Ipswich Archaeological Trust IAT	Archaeological excavation and research since 1974 has shown that Ipswich is one of England's earliest towns but this fact has been little utilised. The vast amount of information gained through excavations could and should be exploited both for the interest of local people and to attract tourism. Clearly, there is nothing above ground to see of the Anglo-Saxon town, apart the street system which dates from that period, but there is a vast collection of artefacts from the excavations and a fascinating story to tell. There is still no adequate display of the evidence for the town's origin and development in the town's museum. The Council should consider using the Community Infrastructure Levy to fund public displays and the dissemination of the results. The connection with the nearby contemporary Royal site at Sutton Hoo should also be exploited. For example, once the full size replica of the Sutton Hoo ship has been built at Woodbridge, it could easily sail to Ipswich waterfront as a tourist attraction and visitors could be better encouraged to visit both locations.	Comments noted. The Council does not currently have CIL but this is regularly reviewed	25259	
	Ipswich Archaeological Trust IAT	There is also potential to develop some of assets of the later town. In the future, there will inevitably be proposals to develop the site of Wolsey's College, near the waterfront, and this would provide an opportunity to promote the Wolsey connections to the town. Consideration should be given to preserving the remains of the College as an archaeological park or at least marking its outline within any new development. A Wolsey display could be housed in the adjacent St Peter's Church. These proposals could be pursued through specific planning policies for the areas of land within the Wolsey College precinct.	Comments noted	25259	
	Ipswich Limited	By utilising its heritage assets for tourism, sharing our great town with visitors and tourists, rather than modern half-baked regeneration projects to launch a university and to market overpriced flats. A new permanent place needs to be found for the Ipswich Market. The Ipswich Market should be an annex of The Saints - and it would be well situated in Cromwell Square. It is the perfect location along the streets of independents on the way to the waterfront with an iconic landmark as a backdrop. Having a stand alone location allows the possibility of a full-time market. Ipswich Borough Council needs to take back control over Ipswich Museums.	Comment noted. The location of the market will be under review once the redevelopment of the Cornhill is completed.	25425	
	Conservative Group (Cllr)	The Upper Orwell Crossings will have a major effect on the traffic around the town. This could ease the congestion within the gyratory allowing better pedestrian access to the waterfront and allowing increased exposure and usage to the cultural assets in this area.	Comments noted. The Upper Orwell Crossings are still under review.	25319	
Q89: How should the Waterfront be further developed as a heritage feature of the town?	Suffolk Preservation Society	We support further development of the Waterfront where a very high standard of design is employed (not exceeding 7 storeys in this location) which does not harm the setting of designated heritage assets and better reveals their significance.	Comments noted	24713	
	Historic England HE	As discussed under other questions, the Waterfront area conservation area appraisal and boundary would benefit from a review, particularly in light of the urban archaeological database. This evidence could then inform strategic policies and a masterplan for the area and how it can be reconnected with the town centre.	The Wet Dock Conservation Area is to be reviewed and re-named the Waterfront Conservation Area	24950	
	Private individual	Use some of the empty commercial units which clearly have no commercial interest as community space or more importantly a temporary museum showing the heritage aspects of the waterfront. space could be used to show old films etc.	Comments noted	24676	
	Ipswich Archaeological Trust IAT	The proposal to create a 'Gippeswyk Centre' on the waterfront, dedicated to telling the story of England's first town, and first advanced in a bid to the Millennium Commission, should remain an objective in some form. This would need to be co-ordinated with whatever display Ipswich Museum proposes but could concentrate on the maritime history of Ipswich from the 7th to 20th centuries. Such a display would be best housed at or close to the waterfront, perhaps in one of the many ground floor 'commercial' unit overlooking the river.	Comments noted. The proposal for a theatre on the ground floor of the winerack has now been altered to consider a retail unit instead. The Council would encourage any cultural enhancements to the waterfront.	25260	
	Ipswich Limited	Despite all the focus, there still isn't a tourist attraction at the Waterfront. There is no visitor centre. There isn't an ATM. Some nice restaurants, cafes and a pub - nothing the town centre hasn't got! Nothing most other settlements do not have including cities, towns and some villages.	Comments noted	25426	
Open Space and Biodiversity	Sports England	Sport England does not encourage a standards approach with regard to the provision of outdoor space for sport, as this fails to take account of current levels of provision and variations in existing supply and future needs. Policies should be based on the current Ipswich Playing Pitch Strategy (2015) which assesses current supply and demand, as well as future requirements, for playing pitches in the Ipswich Borough Council area.	Comments noted and the review of a standards approach will take place in due course	24879	
	Suffolk Wildlife Trust	Provided that the standard set is appropriate and achievable, we consider that using a standards based approach is an adequate way of ensuring that sufficient open space is delivered.	Comments noted	25025	
	Northern Fringe Protection Group NFFG	Yes.	Comments noted	24988	
	Save our Country Spaces SOCS	Yes.	Comments noted	25049	
	Natural England NE	Natural England considers that Accessible Natural Greenspace Standards (ANGS) should be applied to the Borough to ensure that everyone has access to good quality natural greenspace near to where they live. We advise seeking opportunities to link existing natural greenspaces in addition to the management of existing open spaces and the creation of new ones.	Comments noted	24999	
	The Woodland Trust	We favour the use of access standards to determine the amount of new greenspace which may be required, particularly as part of new housing or commercial development. The Woodland Trust has developed an access to woodland standard for use by local authorities. This aspires that everyone should have a small wood of at least two hectares in size within 500 metres of their home. Tree planting/woodland creation can be developed in other ways. Putting street trees in new and existing housing areas can be of great benefit, particularly in reducing air pollution.	Comments noted and Open Space provision is always considered as part of new developments	24905	
	Environment Agency	We welcome the recognition of the range of sizes and types of open space in Ipswich. Benefits of the provision of new, and enhancement on existing, municipal open space include reduced flood risk, leisure provision, social cohesion and an increase in the value of development. The Plan suggests that fewer large areas of open space would be more cost efficient to maintain than a large number of small spaces. However, the plan should also consider the benefits for urban biodiversity and amenity provided by a network of smaller open spaces. Policies should look not only to halt biodiversity loss but to provide net gains for biodiversity wherever possible. We would encourage policies for de-culverting, removal of redundant structures from Main Rivers, creation and maintenance of green corridors to buffer watercourses, native riparian tree planting where appropriate and removal of invasive non-native species. There is currently no mention of non-native species, and the River Cipping in particular has Himalayan Balsam, Japanese Knotweed and Giant Hogweed which are negatively impacting on biodiversity within Ipswich and must be addressed.	Comments noted	25187	
	Conservative Group (Cllr)	No, a standards approach should not be used. As with many other items this should be considered on a case by case basis. Some of the smaller areas of open space in recent developments have proved to be unpopular and difficult to maintain efficiently. If we have such a shortage of housing space, then we need to resist the addition of extra smaller open space areas and instead use contributions from developers to increase the standards of what we already have.	Comments noted and the standards approach will be reviewed.	25320	
	Q91: Is your perception that there is too much, too little or about the right amount of open space in the Borough?	Suffolk County Council SCC	In making decisions relating to open space and biodiversity, IBC should be mindful of the importance of open space and the natural environment to public health, the historic environment and the economy. Factors cited by companies in favour of investing in Suffolk and Norfolk include the area's quality of life and its environment. Our natural environment plays a huge part in the quality of life here and in our existing and future competitiveness. The Local Plan offers an opportunity - even in an urban area like Ipswich - to incorporate measures for enhancement of the natural environment into new development.	Comments noted	25437
		Northern Fringe Protection Group NFFG	Too little. This is evidenced by the deficit to standards across Ipswich in many categories.	Comments noted, although the deficits are not in every area and can be addressed through future plan making	24989
Save our Country Spaces SOCS		Too little. This is evidenced by the deficit to standards across Ipswich in many categories.	Comments noted, although the deficits are not in every area and can be addressed through future plan making	25048	
Greenways Countryside Project		Our perception is that there is not enough open space to meet the needs of a growing population and wildlife.	Comments noted	25348	
Ipswich Wildlife Group IWG		We believe that that there is not enough open space to meet the needs of the growing population and of wildlife.	Comments noted	24827	
NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. Ipswich Limited		When identifying potential land for development, consideration should be given to the role open space plays to the development of healthy communities and preventative care.	Comments noted	24907	
		There isn't enough open space in the borough and this is a direct consequence of boundary constraints which are not fit for the 20th century (not a typo!) and must be expanded.	Comments noted. A boundary review is not currently under consideration	25427	
Q92: There is a deficit of provision for teenagers – facilities such as teen shelters and multi-use games areas. What sort of provision should be made and where?		Ipswich Community Media	The youth we work with in Chantry, Westgate ward in particular are desperate for some youth spaces. Making them bright light and safe - particularly in jubilee area - that would be fantastic. I went down tonight and there were about 60 young people in the dark, in a broken up basketball court. What a treat to make it bright and safe (and keep the dealers out!).	Thank you for the comments, they will be considered further as the plan process continues.	25476
		Suffolk Constabulary	As previously described, this should be on the edge of housing areas - but close enough for young people to be safe and subject to some natural surveillance. Young people in the area, as well as those working with them, should be consulted at the time of any proposals to ascertain which facilities are required by that community. Design Out Crime Officers should also be consulted at the earliest opportunity.	The Planning Policy team will establish direct contact to agree inputs to the ongoing process of planning for community facilities.	24855
		private Individual	More places for young adults to meet and feel safe, without causing ASB.	Comments noted	25518
	private Individual	More music venues needed for youngsters. Something for youngsters to do in Ipswich would be good. No local sports facilities or anything in Stoke Park.	Comments noted	25502	

Q93: There is a deficit of Accessible Natural Greenspace in north Ipswich. A new country park at the Ipswich Garden Suburb will be provided as the development is built out. Do you feel there is a need for more Accessible Natural Greenspace in addition to this in north Ipswich?	Mersea Homes	As the Council notes, the IGS will deliver a new country park serving new and existing development and reducing potential impacts on sensitive habitats to the south of the town. The country park will provide the necessary mitigation for development both in the northern fringes and town-wide. There is therefore, in our view, no need for further mitigation to serve that function. Where development is located away from Ipswich and its fringes - for example further along the A14 corridor, it is possible that specific mitigation may be required to serve those new homes.	Comment noted. The need for additional green space is an important consideration in the delivery of sustainable development as it offers benefits to personal health, feelings of well being and the opportunity for moving around the town by foot or bicycle. Provision will be kept under review and opportunities taken as required.	25493
	Suffolk Wildlife Trust	Whilst we acknowledge that a new country park will be provided as part of the Ipswich Garden Suburb, we query whether this will address the existing deficit of accessible natural greenspace in the north of the town given the number of new residents that will result from the development? Opportunities to provide additional new accessible natural greenspace should be explored in order to address the existing deficit.	Please see comment above	25026
	Northern Fringe Protection Group NFFG	If there is no reduction in the green rim then we believe the current size of the planned country park is appropriate for the current Local Plan provided the other current open space (including sports space) requirements are implemented (including access to sports space at schools). An increase in accessible natural green space (and other outdoor space) will be required if further development to that under the current Local Plan is proposed for the revised Plan. The green rim needs to be geographically defined on a map.	Support noted but the green rim is unlikely to be mapped as the spaces must be brought forward as part of development proposals. A specific local plan allocation would not be appropriate.	24990
	Save our Country Spaces SOCS	If there is no reduction in the green rim then we believe the current size of the planned country park is appropriate for the current Local Plan provided the other current open space (including sports space) requirements are implemented (including access to sports space at schools). An increase in accessible natural green space (and other outdoor space) will be required if further development to that under the current Local Plan is proposed for the revised Plan. The green rim needs to be geographically defined on a map.	Please see comment above.	25047
Q94: What is the minimum size of development which should be required to provide on-site open space?	Greenways Countryside Project	More accessible natural greenspace is required in addition to the new Garden Suburb country park to meet the needs of a growing population/biodiversity. Although very positive, the new GS country park is small for the numbers of people living in the area. Expansion of natural greenspace around the green rim (from the GS country park and generally) is vital to increase the diversity of greenspace offered and accessibility to more residents. Pond Hall Farm should be included within Orwell Country Park to allow visitors to be drawn away from the protected estuary on routes that will cause less disturbance to wildlife.	The Council recognises that the delivery of green infrastructure needs to be achieved through the provision of a patchwork of connected sites. Opportunities will be taken as they arise and the local plan provisions will be monitored for its ability to deliver through the plan period.	25349
	On behalf of RSPB	The RSPB welcomes the Council's intentions for providing greenspace as part of the Ipswich Garden Suburb. However, the Council should ensure that it meets Natural England's Access to Natural Greenspace Standard.	Public access to Green Infrastructure remains a plan priority.	24759
	The Woodland Trust	We strongly support the Council's proposal to include a country park and around 20 ha of new woodland as part of the Ipswich Garden Suburb. We do not have sufficiently detailed knowledge of Ipswich to be able to recommend other areas for tree planting and woodland creation. However, we are ready to work with the Council on taking forward planting when you have identified suitable areas.	Support noted and the Woodland Trust's involvement will be also welcomed in the ongoing work of making quality land and spaces available for people to enjoy.	24911
	Ministry of Defence MOD	The aerodromes are protected with statutory birdstrike safeguarding consultation zones. Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking bird species hazardous to aviation safety.	The MOD will be consulted on relevant applications as they arise and are to include the "open water bodies" that are of concern.	24815
	Ipswich Wildlife Group IWG	In addition to the new Garden Suburb country park, more natural greenspace will be needed for the benefit of the increased population and for wildlife. Expansion of natural greenspace around the green rim is vital to increase accessibility to more residents.	Comments accepted - please see comments above.	24828
	Conservative Group	Personally living in the North West of Ipswich I have never considered there to be a lack of green space in the area and was surprised when I saw the statistic. With that in mind I do not think there is the need for additional green space.	Comments noted but access to open space for all residents remains an important priority for the Council.	25321
	Suffolk Wildlife Trust	Whilst we appreciate that not all development can incorporate on-site open space, all developments can incorporate on-site greenspace. On small sites this can be achieved through the use of features such as green walls, green roofs and well-designed SuDS.	Comments noted	25027
	Northern Fringe Protection Group NFFG	Current standards are appropriate.	Noted	24991
	Save our Country Spaces SOCS	Current standards are appropriate.	Noted	25046
	Greenways Countryside Project	Very small open spaces often provide little benefit for people or wildlife. Therefore on small sites it may be better to consider means to aggregate cash contributions to acquire and manage meaningful spaces across a wider area (rather than simply 'enhance' existing spaces). This would mean that all developments could contribute, and the overall area available and managed for people and wildlife would increase.	The ability to draw down cash contributions from smaller scale development to help bring together larger schemes of open spaces is constrained by the planning practice guidance and legislation concerning Planning Obligations which generally prevents pooling of funds - unless in the form of the Community Infrastructure Levy which is governed by its own legislative framework.	25350
On behalf of RSPB	Whilst it may not be practical or possible to provide on-site open space for small developments, the integration of SuDS, green walls or biodiverse roofs are still possible and as well as adding to Green Infrastructure network can provide wider benefits too. The energy saving potential for green walls is quite significant. In the right situations this can be up to 30% over winter in the right situations due to foliage insulation and a reduction in wind chill to building envelope). For public buildings there are the benefits of summer cooling which can reduce air conditioning requirements.	Comments noted	24757	
Q95: Which models for managing open spaces are effective?	Suffolk Wildlife Trust	With regard to maximising the biodiversity value of open spaces, we consider that strategic management as part of the wider network of sites is likely to be most beneficial.	Comments Noted	25028
	Greenways Countryside Project	Management of open spaces by local authorities (often in partnership with each other and specialist organisations such as Suffolk Wildlife Trust) is the most likely to maintain the wildlife benefit and provides local accountability and a fair distribution of the costs. Management companies and contractors are less likely to sensitively manage wildlife habitats and are not accountable.	Comments noted	25356
	The Woodland Trust	We recognise that the cost of maintenance of landscapes/open space is a significant issue for councils. We would ask you to consider planting of small areas of woodland on existing areas of grass, where these are less well used, or in new developments to put in woodland before the houses are built. Our report, Trees or Turf shows clearly that woodland gives many more environmental, social and economic benefits than does short mown grass (e.g. carbon sequestration, removal of pollutants from the atmosphere, shading of buildings in summer etc) and can also be managed significantly more cheaply.	The promotion of new woodland fits with the council's strategy to continuously increase the green canopy in and around the town. Comments noted	24913
	Ipswich Wildlife Group IWG	Management of open spaces by local authorities in partnership with specialist organisations such as Suffolk Wildlife Trust is the strategy most likely to maintain the wildlife benefit and provide accountability.	Comments Noted	24829
Q96: Are there existing routes around the fringe of Ipswich for cycling and walking that could form the core of the green rim? How wide would the green rim need to be in order to be an effective recreational and wildlife resource?	Suffolk Wildlife Trust	We consider that it is not possible to put forward a definitive figure for the width of the proposed 'green rim' as this will depend on a number of factors, including existing habitat features, existing land uses and the target habitats and species for the particular areas. The 'green rim' needs to be as wide as possible and also be connected to existing (and any new) green routes that run through the town.	These comments are noted and will accord generally with the approach the Council uses as future development packages are progressed through the plan process. The issue will be at the heart of major schemes that may arise in the peripheral areas around the existing boundary of the plan area. Each site will be expected to contribute in compliance with the NPPF and having regard for the viability assessment for the site.	25029
	River Action Group RAG	Whilst the river corridor does not form part of the green rim as such, it is the best and most continuous 'spoke' from the middle of the town to the green rim. As well as being a vital wildlife corridor, the river paths and associated open spaces provide much needed opportunities for people in a part of the town with limited access to open space, especially other natural or semi-natural spaces. The River Action Group would like the plan to reflect this importance and propose better management and more opportunities for formal and informal recreation along the river, by protecting existing undeveloped land and seeking to deliver items identified in the Ipswich River Management Plan, 'A River For All' (approved in draft form by IBC Executive in December 2012 and currently being updated by the RAG). Key future aspirations of the RAG are also contained in its 'Manifesto' for 2016-2021, published last year (copied below as Appendix 1).	The importance of the River as wildlife corridor and recreation space are accepted and will be maintained via policy protection. Ongoing management of the cycle paths and footpaths in the corridor cannot be achieved through planning obligations but specific improvement schemes that can be related to development proposals will be considered on their merits within the Local Plan policy.	24936
	Greenways Countryside Project	Strong support for the 'green rim' concept. It exists in places already from a wildlife perspective, especially Belstead Brook Park, Orwell Country Park and soon hopefully in the Garden Suburb country park. In other areas there is a need to maximise the space available to keep future options open. It is worth protecting open space in the green rim even if a continuous public foot/cycle and recreation space corridor cannot always be achieved.	Support welcomed.	25351
	On behalf of RSPB	Enhancing any existing routes around the fringe of Ipswich which are not going to impact upon the network of designated sites would be a logical progression for forming the core of the green rim. It will be important that cyclists and walkers are accommodated by separate paths to ensure that conflict does not arise between the two user groups. The width of the green rim should not be fixed, as it needs to take in to account existing habitat features and sensitivities. Evidence for landscape-scale conservation clearly sets out that the wider and more connected the better.	Comments noted	24758
	Private individual	Great to see that the new plan considers sustainability and climate change. For a successful green rim, a holistic approach is needed. Ipswich certainly has cycling and walking routes, however, especially for cycling these unexpectedly stop very often. I feel the new plan should consider the 're-creation' of new cycling/walking routes, using the existing infrastructure but also creating new infrastructure that will include IBC and expand to Suffolk areas. For a wildlife resource, you need strong focal points but a continuous network to support it.	Achieving an improved degree of connectedness will remain an overarching objective for this policy.	24800
	Ipswich Wildlife Group IWG	We strongly support the green rim concept. Belstead Brook Park, Orwell Country Park and the planned Garden Suburb country park form an existing basis for the green rim. In other areas, regardless of size, the open space is worth protecting as a link within the green rim.	Comments welcomed	24830
Q97: How can the Ipswich Wildlife Network be further enhanced and linked into surrounding areas?	River Action Group RAG	The Group would like to see the Plan identify and protect areas of undeveloped land alongside the river for wildlife (and public access) benefit. Proper maintenance and monitoring of the habitats and corridor is essential to ensure the wildlife network functions are delivered, and additional resources are required for this. A strong link along the corridor into Babergh district is vital - the river corridor as a route for people and a vital part of the wildlife network, doesn't stop at the Borough boundary. Closely linked policies in the neighbouring Local Plans would ensure sensible continuity of purpose.	The Council will explore the possibility of creating wildlife links along the river corridor.	25496
	Suffolk Wildlife Trust	The network needs to explore links into and out of the 'green rim', both into town and out into the surrounding districts. A joined up cross boundary approach should be taken to delivering the network on the edge of town and in Suffolk Coastal DC, Babergh DC and Mid Suffolk DC.	The Council will explore the possibility of creating green links with surrounding districts.	25030
	Greenways Countryside Project	The wildlife network of the town is excellent, but needs adequate resourcing to ensure efforts to maintain, enhance and monitor it are sufficient (i.e. the Greenways Project/Partners Service). In order to greatly improve the value of the network, it is clear that links into the surrounding districts are vital for it to be truly meaningful. Continuity could be achieved by the neighbouring districts having similar networks (and related planning policies) for the relevant areas around the fringes of Ipswich. This would ensure vital connections are maintained across political boundaries.	The Council will explore the possibility of creating green links with surrounding districts.	25352
	On behalf of RSPB	On a wider scale, extending the network across the IHMA through co-operation with neighbouring planning authorities is the first step. Integrating SuDS in to new developments (see earlier representations on Q74/75) and retrospectively will enhance the network whilst at the same time offer wider socio-economic benefits as previously stated. Working in effective partnership across agencies is critical to effective delivery.	The Council will explore the possibility of creating green links with neighbouring planning authorities. Furthermore, the Council recognises through policy DM4 that SuDS are an important method of reducing flood risk.	24756

	Ipswich Wildlife Group IWG	To improve the value of the Wildlife Network, creating links with surrounding districts would increase its value and effectiveness. Continuity could be achieved by the neighbouring districts having similar networks for the relevant areas around the fringes of Ipswich. This would ensure vital connections are maintained across political boundaries.	The Council will explore the possibility of creating green links with surrounding districts.	24831
Q98: Should more areas of the Borough be designated as Local Nature Reserves, and if so where?	Suffolk Wildlife Trust	We support the recognition of the nature conservation value of sites through appropriate designation. Whilst we support LNR designations, this requires an element of public access which may not be compatible with the habitats/species present. If the LNR designation doesn't prove suitable, consideration should be given to designating them as County Wildlife Sites. We recommend that a review is undertaken of all of the existing parks/open spaces with a view to designating any which meet the criteria. Areas bordering existing LNRs, e.g. Kirt Meadow which is adjacent to Spring Wood LNR and Bobbit Lane LNR, should be considered for designation.	Comments noted on requiring a parks and open spaces review.	25031
	Northern Fringe Protection Group NFPG	Yes. These could form part of the green rim.	Comment noted.	24992
	Save our Country Spaces SOCS	Yes. These could form part of the green rim.	Comment noted.	25045
	Greenways Countryside Project	Local Nature Reserve designation affords proper protection for areas valued by people and wildlife. New LNRs should be designated at: Holywells Park; Christchurch Park; Chantry Park; Bourne Park; Ellenbrook Meadow and open space; Gippeswyk Park, the Garden Suburb Country Park; Braziers Wood (the only Ancient Woodland within the Borough); Braziers Meadow and Ravenswood open spaces; Pond Hall Farm; Landseer Park; Bramford Lane open space; Stonelodge Park; and Bramford Road Recreation ground. Also, any site which is used as a receptor site for reptiles, being translocated from development sites, should also be given LNR status to ensure ongoing protection and management.	The policies in the local plan will support the protection of LNRs and the biodiversity value of the parks and open spaces in the Borough.	25353
	On behalf of RSPB	Yes. The Council should conduct a review of any significant areas of greenspace, i.e. the Parks network and designate any of these as Local Nature Reserves to ensure their statutory protection for not only the life of this plan, but for generations to come.	Comments noted.	24760
	Ipswich Wildlife Group IWG	Yes. Local Nature Reserves protect areas valued by people and wildlife. We suggest the following sites should be considered for Local Nature Reserve status: Holywells Park; Christchurch Park; Chantry Park; Bourne Park; Ellenbrook Meadow and open space; Gippeswyk Park, the Garden Suburb Country Park; Braziers Wood, Braziers Meadow and Ravenswood open spaces; Pond Hall Farm; Landseer Park; Bramford Lane open space; Stonelodge Park; and Bramford Road Recreation ground.	Comments noted.	24832
	River Action Group RAG	The river and its associated paths and open spaces offer a safer, traffic-free route for local people along with the chance to improve health and wellbeing from immersion in high quality green space. The river path is well used for running, but new surfaces, paths and links would increase use. The installation of a 'trim trail' would also increase use of the corridor as well as providing for health and fitness improvements. The river itself is currently underused as a sporting resource. The new Plan should recognise this opportunity and seek to identify suitable locations for providing access to the water. A launch facility could be linked to a riverside centre with canoe club facilities. Sites are now limited and our preferred option is the land bordering the river and Alderman Canal north.	The Council has recognised the importance of the River and pathways running through the town for their contribution to the green/blue corridors identified in the Plan. Specific initiatives, like those suggested, to increase the use of these corridors will need to be the subject of further discussion with the Council's Sports and Leisure Services.	25497
	Ipswich Community Media	There is a good mix - but many of the young people simply can not afford to swim - they really want to do this - can there be a better deal - i.e. cheap day swims etc?	Ipswich Borough Council (Sport and Leisure Services) offer a range of facilities, including swimming and there is a comprehensive concession policy ensuring that those families on low incomes are able to make use of all our facilities. The Council will maintain its commitment to the delivery of leisure and recreation initiatives such as this year's free Young Person iCards for all the school age Ipswich children, allowing free use of facilities for the 6 weeks of the summer holidays.	25477
	Sports England	Policies relating to provision for sport should be based on the findings of the Ipswich Playing Pitch Strategy (2015) (for outdoor sport), and the Ipswich Sports Facilities Strategy (2015) (for indoor sport). These assessments used the approved Sport England methodology for such studies and are therefore considered to be a robust evidence base on which to inform local plan policy.	Comment noted.	24880
	Northern Fringe Protection Group NFPG	No. It needs more outdoor sports space in areas where a deficit has been identified. Easy access for the general public to new schools on the Ipswich Garden Suburb must be agreed under planning conditions for the schools and enforced accordingly. New developments should be accompanied by a corresponding increase in provision.	The Sports Council have supported the Ipswich Playing pitch strategy and this will be used as a 'robust' evidence base to support requests for an appropriate level of additional provision to accompany new development.	24993
Save our Country Spaces SOCS	No. It needs more outdoor sports space in areas where a deficit has been identified. Easy access for the general public to new schools on the Ipswich Garden Suburb must be agreed under planning conditions for the schools and enforced accordingly. New developments should be accompanied by a corresponding increase in provision.	Comments noted, please see comments above.	25044	
Suffolk Chamber of Commerce	The parks in Ipswich and especially Chantry, Christchurch and Holywells are wonderful assets for residents and tourists alike as are wider green spaces such as Orwell Country and Belstead Brook Parks. These areas must be preserved, extended where possible, and Plan policies developed that might further enhance biodiversity in the town.	Support for the Council's approach (which is to be maintained) is welcomed.	25173	
Private individual	A parkour club for older children would be beneficial for the IP2 area. Youngsters in Chantry have a massive interest in parkour but no means to practise their interest. They use what they have, which can cause breakages. Currently only Pipers Vale offers this kind of club on Mondays until 10pm so it is not viable for youngsters from Chantry to get there - e.g. 2 buses home. It would be dangerous for children to make this journey. There are various suitable places the most ideal being Chantry Academy's new sports facility, Goals, Stoke. The space is there.	Comments noted - this matter will be considered further as part of the ongoing planning process and further information may be requested.	24794	
Environment Agency	This section could expand upon the use of multifunctional open spaces to contribute towards sport and leisure provision. These spaces provide playing fields and amenity space, which improve the physical health and mental wellbeing of the community. The Plan should take an integrated approach to combine the provision of sports and leisure with open space and biodiversity to best benefit people and wildlife.	The EA ethos explained in this response also lies at the heart of the Plan approach to the town's green rim public open space and alternative transport policies.	25185	
Ipswich Community Media CIC	We have no arts centre or cultural quarter - we have lost millions of pounds of inward investment because of this over the years.	The town has a strong artistic heritage with the performing arts catered for in a dispersed pattern of facilities. Other art forms have been addressed within other facilities (such as Christchurch mansion or the Town Hall) on an occasional basis, but the plan recognises that a central facility either within the town centre or on the waterfront would bring significant benefits to the town. Policy SP14 concerning the delivery of arts, culture and tourism will therefore be retained.	25254	
Ipswich Limited	Ipswich has inadequate sport and leisure facilities outside of educational establishments.	The Local Plan evidence base prepared in conjunction with the Sports Council has not identified a shortfall in provision. However, the delivery of the expected development through the plan period should not create such a shortfall and new facilities will sought as part of the planning and development process, in accordance with Policy CS16.	25428	
Conservative Group	If we want Ipswich to be considered as a regional 'hot-spot' for leisure activities then we need to increase the scope and quality of our services. We need to be bold in our visions and innovative with our ideas not stuck with 20th century standards in a 21st century world.	Comments noted	25322	
private individual	There is nothing for the people of Ipswich to make them stay.	Please see comments above	25507	
Private individual	Make use of school/university facilities for further use by charities/social organisations.	The policies of the local plan are generally supportive of shared uses of the existing facilities	25516	
Private individual	Improve the leisure offering in town	Please see comments above	25522	
private individual	Install posts next to the grass verges in roads in and out of the town centre to stop people parking and ruining the verge, it gives a poor impression to visitors. I think the town would also benefit from more free parking, it is far too expensive at the moment. Pay and display car parks are also a bad idea, they discourage people from staying, shopping and eating in Ipswich, as they are always rushing back to the car to avoid a ticket.	Where parking restrictions exist on the carriageway these also apply to the adjacent verge and footway. These can be enforced by the Council's Civil Enforcement Officers.	25528	
Demography, Social Inclusion and Health	Q100: How should we best plan for an ageing population in the Borough?	Suffolk's population is ageing at a faster rate than the national average. Meeting the needs of older people, with housing and the built environment designed to reflect changing requirements, offers a chance to improve older people's independence and quality of life whilst also contributing to reductions in overall demand for health and care services. IBC should give detailed consideration to retaining or expanding the policy requirement that a proportion of new homes be built to the optional standards allowed for through the Deregulation Act 2015. IBC should also consider the need to make specific allocations for housing with care.	Comments noted - The Council's response to planning for an ageing population will come with several key elements. Design guidance emerging for Ipswich's public realm will ensure that streets in the town centre can be easily understood and offer clear visual features that help to reduce opportunities for misunderstanding. The housing provision will continue to seek a mix of new homes in accordance with an updated strategic housing market assessment (policy CS8) and policy DM12 will encourage the delivery of the "homes for life" standard in larger housing developments. There seems to be a good level of response from the housing market to the delivery of "housing with care" and the Strategic Housing Market Assessment currently suggests a surplus in the type by the end of the plan period. Specific allocation does not appear warranted at this stage however, the matter will be scrutinised as part of the review process.	25435
Suffolk Constabulary	Older people can be more vulnerable than other members of the community, therefore any purpose built accommodation must be built to SBD standards. Design Out Crime Officer advice should be sought prior to planning purpose built accommodation to ensure that it is not located in known crime hotspots where a disproportionate level of distress may be caused to residents.	Secured by Design liaison will continue to be welcomed as part of the application process. In addition to creating sound residential areas the Council will also try to enhance the public realm as part of its drive for Alzheimer friendly environments.	24856	
Private individual	By planning for various age ranges. I understand "old" means over 55. 55 year olds have different needs than over 65's; over 75's, over 85's over 95's. Over 55's do not just want to move to sheltered accommodation.	Please see comments above	24752	
Gladman Developments	The provision of specialist housing to meet the needs of older people is of increasing importance and the Council need to ensure that this is reflected through a positive policy approach. The Council need to have a robust understanding of the scale of this type of need across the District. Therefore, in addition to the above suggested policy wording, which provides a positive framework in relation to sites which may come forward for extra care developments Gladman recommend that specific site allocations for this type of specialist housing should also be identified and included within the Local Plan.	Please see comments above in response to SCC	25394	
Ipswich Limited	We should encourage - through collaboration with the neighbouring district council for retirement housing and care homes to be concentrated in Felleslowe and the Suffolk Coast. We should encourage (not force) a better environment absent of the hazardous pollution associated with Ipswich, which should extend their life through better health and well-being of the ageing population. This would unlock existing housing stock, avoiding the need to build so many new poor quality developments, and best of all should reduce the demand for burial plots in the town each year.	The Council will continue to cooperate with the partner authorities operating within the housing market area identified for the town and its surrounding area. The Council's policies will not be able to intervene in the market in the manner or to the extent suggested.	25429	
Q101: The current Local Plan safeguards land for new or extended primary schools and sets out	Suffolk County Council SCC	The County Council welcomes that the Borough Council has these measures in place and would like to see them continued. As with consideration of the ageing population, consideration could be given to the way in which children and younger people interact with the built environment.	Comments noted.	25434

	standards for children's play provision. Are other planning responses	Gladman Developments	Given the existing evidence in relation to ageing populations, and the national strategy in relation to housing for older people, Gladman recommend that the Local Plan should include a specific policy in relation to the provision of specialist accommodation for older people.	The Council will maintain its commitment to the arts and theatres in the Town Centre (Policy CS14) and in Policy DM22	25113
	Q102: In what other ways could the land use plan help to tackle issues of deprivation and inequality in Ipswich?	The Theatres Trust (Planning Adviser)	The NPPF provides clear directions to LPA about safeguarding/promoting cultural activities/venues. One of the 12 core planning principles (para.17) is the need to plan for culture to support social wellbeing/sustainable communities. Para.23 recognises the important role town centres play in supporting communities and notes that cultural venues make a valuable contribution to the vibrancy and success of these centres. Para.70 states that in 'promoting healthy communities', planning decisions should 'plan positively for cultural buildings' and 'guard against the loss of cultural facilities/services.' Para.156 directs LPA to ensure their LP includes cultural policies that reflect the NPPF.	The importance of the issue is recognised by the proposed segregation of the matter (from a hybrid policy) to a dedicated Air Quality management policy.	24994
		Northern Fringe Protection Group NFFPG	The most obvious means is to improve air quality in AQMAs. IBC has ignored this major health issue and inequality in Ipswich for far too long.	See above	24995
		Save our Country Spaces SOCS	The most obvious means is to improve air quality in AQMAs. IBC has ignored this major health issue and inequality in Ipswich for far too long.	Comments noted - although they cannot be addressed through the land use planning system.	25043
	Q103: How else should the Local Plan tackle health inequalities?	Ipswich Community Media	Emerging communities are not understanding advice / letters / appointments, missing them and then losing all rights to attend dentist etc. - the repercussions we are seeing -terrible teeth and no glasses for kids - supporting this and encouraging a campaign to support all people to understand how the systems work. ICM / SRS can help	The Council has tried to address each of these issues throughout the plan review process.	25478
		Suffolk County Council SCC	Public health intersects with many areas of the planning system. The Joint Health and Wellbeing Strategy for Suffolk (refreshed in 2016) identifies four strategic outcomes with four cross cutting themes (see full comments). The plan should: make provision for play space on allocated sites and safe walking and cycling routes; include additional standards for accessible homes; increase the number of accessible homes in Ipswich; include dementia-friendly design. IBC should consider whether Building for Life Guidelines are sufficient, or whether to produce more detailed local design guidance. Access to the natural environment improves mental and physical health and wellbeing, prevents disease and helps people recover from illness. Green space delivered through the Local Plans, can help to reduce health inequalities.	The importance of the issue is recognised by the proposed segregation of the matter (from a hybrid policy) to a dedicated Air Quality management policy.	25436
		Northern Fringe Protection Group NFFPG	Improving air quality should receive greater focus and new developments must demonstrate that they will not worsen air quality before gaining planning consent.	See above	24996
		Save our Country Spaces SOCS	Address Air Quality issues within Ipswich as a priority.	Comments noted	25037
		Gladman Developments	The Framework (paragraph 69) also recognises that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. The development of sustainable new communities through strategic allocations within a local plan (crossing local authority boundaries where necessary) provides the opportunity to embed the principles of garden settlements and in doing so integrate an approach that will ensure that an attractive environment is developed to support the formation of healthy and sociable communities.	Comments noted	25395
		Ipswich Community Media CIC	Would be happy to pay more for investment in poorest areas .	These objectives are noted.	25255
Any Other Issues?	Q106: Parts 1 and 2 of this consultation paper have considered many different issues affecting Ipswich. Are there any other issues not mentioned here, which relate to land use in Ipswich, about which you would like to comment?	Ipswich Community Media	We want the arts, creativity and real grass roots opportunities. We would like to see equal chances to access the arts - as 100% of our young people are not attending any of the Wiseys young theatre groups - but have got seismic skills. Dance east are being fantastic at supporting us now - and we are all seeing the benefits, including community cohesion.	The local plan review has attempted to respond in the manner suggested.	25479
		The Theatres Trust (Planning Adviser)	Local plans should support arts and culture at all levels to support the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities. Policies should protect, support and enhance cultural facilities and activities and promote cultural led development as a catalyst for wider regeneration in town centres.	The Council has responded to the Minerals and Waste Plan and awaits further response as the respective plan aims will need to be resolved under the duty to cooperate.	24985
		Suffolk County Council SCC	Minerals and Waste issues are not a natural fit under any of the headings provided. However, they are of relevance to the development of the Plan. IBC will be aware that the County Council is currently developing a new Minerals and Waste Local Plan for Suffolk. Ipswich Borough Council will need to be most aware of the safeguarding policies designed to protect the use of waste sites and the use of various kinds of minerals sites as well as minerals resources. See full comments for relevant draft policies.	Advice and comments noted.	
		Historic England HE	Protection of the historic environment should be fully taken into account at all stages and levels of the local planning process. We have produced a number of detailed Good Practice Advice and Advice Note documents. We recommend that you review them as part of your local plan development, alongside our Conservation Principles. In preparation of the forthcoming local plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups. Absence of a comment on an allocation or document in this letter does not mean that Historic England is content with it.	The local plan review has addressed the issues raised in the National Planning Policy Framework. Prospective developers can make use of the policy guidance which the Local Plan makes available to inform the application process and Development Management staff will assist through the pre-application advice system. Details are available through the Council website.	24890
		Suffolk Chamber of Commerce	Planning processes and decisions should be supportive of private sector investment and job creation and must be undertaken in a timely manner across all of the topic areas with clear timetables and dedicated support for those businesses new to the planning process or unable to buy in specialist support.	Comments noted. The Council is working with the New Anglia LEP to assist the local economies of the region.	25156
		Private individual	Community growing spaces should be encouraged. This could go further than simply allotments, but herb beds could be located along district centres and in some brownfield sites where volunteers could grow food for the community. Where appropriate landscaping schemes could include fruit bearing trees which again could be eaten by the wider community. This would improve community spirit bringing people together.	Comments noted.	24677
		Private individual	Ipswich has a rich history, it has some of the finest buildings in the county and I am not referring to some of the so called high spec buildings built since the 60s. It's time to shout about our history and build on it. We are not a London over spill. Suffolk is built on hard work and graft it is not based on pie in the sky. The town should serve the county. It would be great to see both the council and the county council work together to keep Ipswich together.	The Council will continue with its public realm improvements and design management policies to seek a quality for the town which reflects its heritage .	24838
		NHS England (NHSE) and Ipswich and East Suffolk Clinical Commissioning Group. (CCG)	NHS England and the CCG will have further comments to make as details of specific developments become available. In order to provide a more detailed response, a clearer understanding of phasing and anticipated trajectory will be required. Increase in the provision of assisted living developments and residential care homes, although a necessary feature of care provision and to be welcomed, can pose significant impacts on local primary care provision and it is important that planners and developers engage at a very early stage with the NHS, to plan and implement suitable mitigations. It is also important we continue to be consulted in relation to emerging Neighbourhood Plans in order to work with local communities to deliver and maintain sustainable healthcare.	Council Officers have made information available to the CCG and welcomes the on-going dialogue.	24912
		Environment Agency	No mention is made of the Ipswich Tidal Flood Barrier and associated flood defences or to foul drainage capacity in Ipswich. Both topics are raised in the Sustainability Appraisal Scoping Report and should also be included here. If a Community Infrastructure Levy is to be adopted, we would welcome contributions towards flood risk infrastructure such as the future maintenance of the tidal barrier and existing tidal and fluvial defences. Also, the River Gipping and Orwell Estuary are overlooked in the plan. The Gipping is a neglected asset. Include proposals to enhance its visual and ecological quality and maintain water quality.	The Council is proposing to ensure the River Gipping and Orwell estuary are seen as an important part of the corridors that traverse the borough with a view to safeguarding them as habitat, wildlife corridors and acceptable corridors for cycling and walking.	25180
		Ipswich Limited	I would strongly welcome the borough council to explore adding such flexibility into planning policy. The borough council needs to work with landowners and developers, rather than alienate them. The council needs to inject confidence into the Princes Street office corridor area by building the third office block.	Comment noted	25430
		Private individual	Have less unused abandoned buildings that could be used for housing / social uses. Sort out the 'wine rack' building.	Comments Noted - the wine rack has now been restarted	25517
		Private individual	IBC needs to cover a bigger area i.e. you have a number 4 bus from the town centre to Martlesham Heath. You need to have Kesgrave and Martlesham Heath areas as part of IBC.	Comments noted. The Borough boundaries are set by the boundary Commission.	25510