

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 –2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

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

## **Consultation Comments Form**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH**  
BOROUGH COUNCIL

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

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

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

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
Title	Mr	
First name	Jamie	
Last name	Murphy	
Job title ( <i>where relevant</i> )	Conservation Officer	
Organisation ( <i>where relevant</i> )	RSPB	
Address ( <i>Please include post code</i> )	RSPB Minsmere Sheepwash Lane Westleton Saxmundham Suffolk IP17 3BY	
E-mail		
Telephone No.		

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

<b>Your name or organisation (and client if you are an agent):</b>	Jamie Murphy, RSPB
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Please specify which document(s) and document part you are commenting upon.

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

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
<p><b>Core Strategy and Policies Development Plan Document Review Final Draft</b></p> <p><b>DM15 – Tall Buildings</b></p>	<p>During the prior consultation on Ipswich Local Plan Review Preferred Options, the RSPB responded with comments on various policies and is very pleased to see that the majority of these have been taken into consideration. It also commends the explicit reference to take action to conserve and enhance swift populations in the Natural Environment Policy (DM8), Design and Character Policy (DM12) and Supplementary Planning Documents.</p> <p>There is however one notable omission from the Core Policies and Strategies Development Plan in relation to DM15 – Tall Buildings. A representation (24740) was made by the RSPB at the Issues and Options stage to include a further line in the policy, ‘k) to incorporate integrated swift-bricks.’ It is evident that this suggestion has not been taken forward and is seen as a missed opportunity.</p> <p>Such is the plight of swifts nationally (note that their breeding population has declined by 57% between 1995 and 2016 and they are consequently an Amber-listed species of conservation concern<sup>1</sup>), it is felt that failing to incorporate this basic measure could constitute a failure in the Borough Council’s ‘Duty to conserve biodiversity’ under Section 40 of the Natural Environment and Rural Communities Act 2006, whereby a public authority ‘must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity... which includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.’</p> <p>Given that the cost of incorporating swift bricks in buildings is insignificant (c£20 per brick) and that the attitude of housing occupants towards them is very positive<sup>2</sup>, it does not seem that inclusion would affect the Borough Council’s ability to exercise its functions and indeed would be consistent with the County Council’s Suffolk Nature Strategy which states “swifts need suitable spaces in buildings to nest.”</p> <p>Furthermore, this kind of inclusion is not unprecedented. The Hackney proposed submission local plan (Policy LP47D) asks that “all development proposals with an eaves height of 7 metres and above are required to provide</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>nesting boxes for swifts..."<sup>3</sup>.</p> <p>With this context in mind, the RSPB hope that Ipswich Borough Council will consider including this provision in its Local Plan to ensure the precedent is set for conserving biodiversity in its development management policies and demonstrate its continued commitment to swift conservation.</p> <p><sup>1</sup> <a href="https://www.bto.org/sites/default/files/shared_documents/publications/birds-conservation-concern/birds-of-conservation-concern-4-leaflet.pdf">https://www.bto.org/sites/default/files/shared_documents/publications/birds-conservation-concern/birds-of-conservation-concern-4-leaflet.pdf</a></p> <p><sup>2</sup> <a href="https://actionforswifts.blogspot.com/2018/06/the-attitudes-of-housing-occupants-to.html">https://actionforswifts.blogspot.com/2018/06/the-attitudes-of-housing-occupants-to.html</a></p> <p><sup>3</sup> <a href="https://hackney.gov.uk/lp33">https://hackney.gov.uk/lp33</a></p>

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

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

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

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

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

The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.

Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.

Adoption of the Ipswich Local Plan Review.

**PRIVACY NOTICE**

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

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

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

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

