

Public Consultation for the Ipswich Local Plan Review Final Draft

15th January 2020 – 2nd March 2020

Planning and Compulsory Purchase Act 2004

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

Consultation Comments Form



**IPSWICH
BOROUGH COUNCIL**

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Consultation document(s) to which this comments form relates:	Core Strategy and Policies Development Plan Document Review-Final Draft Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review – Final Draft Site Sheets Part 2 – IP080-ISPA 4.1 Plan 5 – Ipswich Ecological Network
Please return this comments form to:	planningpolicy@ipswich.gov.uk or Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	11.45pm Monday 2nd March 2020
This form has two parts:	Part A – Personal details
	Part B – Your comment(s).

PART A PERSONAL DETAILS		
	1. Personal details	2. Agent's details (if applicable)
Title	Ms	
First name	Jill	
Last name	Crighton	
Job title (<i>where relevant</i>)	Conservation Planner	
Organisation (<i>where relevant</i>)	Suffolk Wildlife Trust	
Address (Please include post code)	Brooke House The Green Ashbocking Ipswich IP6 9JY	
E-mail		
Telephone No.		

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

Your name or organisation (and client if you are an agent):	Suffolk Wildlife Trust
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Please specify which document(s) and document part you are commenting upon.

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

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<p>Core Strategy and Policies Development Plan Document Review- Final Draft Chapter 5. Section 5.26, Table 2.</p>	<p>Biodiversity Section currently states – “The need to halt biodiversity net loss.”</p> <p>Suggest this is amended to state - “Prevent loss of biodiversity and implement measures for biodiversity net gain”</p> <p>The government is mandating that, through the new Environment Bill, all development (with a few exceptions) will be required to secure gains in biodiversity. It is therefore not sufficient to state that there will be a halt in net loss.</p>
<p>Core Strategy and Policies Development Plan Document Review- Final Draft Chapter 6, Objective 9.</p>	<p>“9. NATURAL ENVIRONMENT – To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use. “</p> <p>Consider addition of reference to ecological networks and connectivity. NPPF references the need to establish, conserve, restore and enhance ecological networks under Paragraphs 173-d. and 174-b.</p>
<p>Core Strategy and Policies Development Plan Document Review- Final Draft Policy DM8</p>	<p>With regards to development which could have an impact on an SSSI, Policy DM8 conflicts with the NPPF.</p> <p>DM8 states that “Sites of Special Scientific Interest (SSSI) will be protected from development, which directly or indirectly would have an adverse effect on their natural value. An exception will only be made where a proposed development:</p> <ul style="list-style-type: none"> a. could not be located on an alternative site that would cause less harm; b. would deliver benefits that clearly outweigh the impacts on the site’s special interest and on the national network of such sites; and c. would compensate for the loss of natural capital.” <p>Conditions a. and c. clearly conflict with Paragraph 175b of the NPPF which only allows for Condition b. (benefits outweighing impacts).</p> <p>This Policy should be updated to reflect this.</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Core Strategy and Policies Development Plan Document Review-Final Draft Policy DM12	In Policy DM12, point d. there should be an inclusion of the potential for installation of green roofs and walls as part of the strategy to introduce greener streets and spaces. This would make a more robust argument for the requirement for net gains in biodiversity.
Core Strategy and Policies Development Plan Document Review-Final Draft Policy DM15	<p>We have been informed by the RSPB that a suggestion was made to add a further point to DM15 – Tall Buildings with regards to the provision of swift bricks in new buildings.</p> <p>This is a sentiment we share at the Suffolk Wildlife Trust, and we note that there are no references to Green Space or biodiversity measures within this policy, which appears to be a valuable missed opportunity.</p> <p>We propose the addition of a further point: k. to incorporate integrated swift bricks”.</p> <p>In addition to this, other biodiversity features could be noted here, such as the provision of green walls and roofs which would help meet the biodiversity net gain requirements.</p>
Core Strategy and Policies Development Plan Document Review-Final Draft Policy DM17	In addition to the points made under Policy DM17 regarding small scale residential developments for infill, backland or severance plots, a point should also be made to deny permission for any development which could result in an unacceptable loss of semi-natural habitat, which could be important in its own right, or support protected and/or priority species.
Core Strategy and Policies Development Plan Document Review-Final Draft Policy ISPA2	Strategic Infrastructure Priorities - We consider that policy ISPA2 should also include delivery of strategic green infrastructure alongside the other types of infrastructure listed.
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review – Final Draft Site Sheets Part 2 – IP080-ISPA 4.1	<p>Policy DM10 of the Core Strategy and Policies Development Plan Document Review-Final Draft seeks to maintain and enhance green corridors and find opportunities to link existing green corridors.</p> <p>However, two of the sites proposed for development, IP143 and IP067b, currently make up quite a substantial part of Green Corridor F, forming the semi-natural habitat link between the south-western boundary of Landseer Park Carr County Wildlife Site (CWS) and the western boundary of the Volvo Raeburn Road CWS. If these sites are fully developed, this ecological network would be interrupted.</p>

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In association with Plan 5 – Ipswich Ecological Network and Plan 6 – Green Corridors	<p>Green Corridor F is the longest existing ecological network in Ipswich, and if sensitive development is undertaken in the Ravenswood area (Sites IP150b, c, d, e and IP152), maintaining a good proportion of the existing habitat, then this corridor could be continued to the east.</p> <p>This network would begin at Holywells Park, continue through Landseer Park, Sites IP143 and IP167b to Volvo Raeburn Road Site, Piper’s Vale, Brazier’s Wood, Pond Alder Carr and Meadow and fork at Bridge Wood (on the opposite side of A14) continuing to the River Orwell to the south and via Sites IP150b, c, d, e and IP152 onwards to Foxes Pit, Fox Farm Meadows and surrounding woodland blocks across the A14 to the east.</p> <p>We are pleased to see that so many of the recommendations from the Ipswich Wildlife Audit 2019 have been taken into account.</p>
Plan 5 – Ipswich Ecological Network	<p>This map refers to Wildlife Audit 2012/2013, which is not the most up-to-date Audit as a further Audit took place in 2019.</p>

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

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

RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

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

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

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

Adoption of the Ipswich Local Plan Review.

PRIVACY NOTICE

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

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

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

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