

Public Consultation for the Ipswich Local Plan Review Final Draft

15th January 2020 – 2nd March 2020

Planning and Compulsory Purchase Act 2004

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

Consultation Comments Form



e-mail:
planningpolicy@ipswich.gov.uk

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

website:
www.ipswich.gov.uk

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

PART A PERSONAL DETAILS

	1. Personal details	2. Agent's details (if applicable)
Title		Mr
First name		John
Last name		Bowles
Job title (<i>where relevant</i>)		Director
Organisation (<i>where relevant</i>)	Associated British Ports	Savills
Address (<i>Please include post code</i>)	Ipswich Port	33 Margaret Street London W1G 0JD
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):	Savills on behalf of Associated British Ports ('ABP')
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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>ABP is the owner and operator of the Port of Ipswich which is the UK's leading grain exporter and largest of ABP's short-sea ports and which, together with ABP's other East Anglian Ports at Kings Lynn and Lowestoft, contributes some £360m directly into the UK economy every year and supports 3,700 jobs in the region and 5,300 jobs nationally (2019 figures).</p> <p>The Port of Ipswich provides an extensive range of facilities to meet the needs of businesses and industry based in Norfolk and Suffolk. It is the UK's leading grain exporter and largest of ABP's short-sea ports with the ability to handle containers, dry bulks and aggregates, forest products, general cargo and offering extensive roll-on roll-off facilities. The total port area (including water) is approximately 111 ha (275 acres) and the Port handles more than three million tonnes of goods per year. The Port is rail connected and can offer intermodal services from the Port to inland facilities including rail terminals such as ABP's own Hams Hall Railfreight Terminal in the Midlands. The Port is also the base for expanding marina activities.</p> <p>The importance of the Port continuing to flourish as a major economic driver in the sub-region and its 'significant role' in driving further growth in the region through future expansion is recognised in the NALP Strategic Economic Plan and the adopted Core Strategy.</p> <p>As well as maintaining its operational activities, ABP is concerned to ensure that it retains the right and ability to fully use its land and infrastructure for port purposes in the performance of its statutory duties and responsibilities as a harbour undertaking. Whilst, therefore, ABP is keen to support the realisation of the wider development objectives and aspirations of the Core Strategy and Policies DPD Review, it must protect its 'significant (economic) role' and ability to expand further and assist in driving growth in the region. New development should be sensitive to these existing uses and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.</p> <p>The 'Island Site', which is identified by Ipswich Borough Council (IBC) and its partners as one of the key regeneration opportunities in central Ipswich, is within ABP's land ownership and presently accommodates successful high profile marine businesses and the commercially successful Ipswich Haven Marina (which has contributed significantly to the regeneration so far of the Waterfront area).</p> <p>ABP is supportive of the redevelopment of the Island Site (it is one of ABP's 'pathfinder projects') subject to its redevelopment being commercially viable and deliverable. ABP's vision for 'Ipswich Island' is that it will be a viable, high quality, sustainable, residential led mixed use development that maximises its waterfront location. The development will be true mixed use, incorporating (alongside homes); boat building, other maritime activities and leisure uses, enhancing connectivity between the site, the Town Centre and the Station as well as around the Waterfront (including via a new circular Maritime Trail).</p> <p>However, until a satisfactory scheme is agreed with IBC for its redevelopment, ABP reserves the right to continue to use the Island Site as operational port area</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>and to restrict access in the interests of public safety and port security.</p> <p>ABP's representations on the Core Strategy and Policies DPD Review Final Draft below are made in this context.</p>
Policy CS2	<p>The Island Site is situated within the Waterfront area to which this policy applies. As noted at para 5.21, parts of the operational port are also within it. In that context, ABP notes the desire of IBC to secure high density development in the interests of maximising the use of previously developed land, subject to that not compromising heritage assets and the historic character of Ipswich.</p> <p>For a variety of reasons, including the mix of existing and proposed uses on the site, ABP's vision for the Island Site (agreed with the partners and the LEP) does not envisage 'high density' development as currently defined in Final Draft Policy DM23. Given this, ABP request the inclusion of additional wording in the final paragraph of Policy CS2 which should be amended as follows <i>"...and low elsewhere, unless otherwise agreed through masterplans and provided that in all areas it does not compromise heritage assets.."</i> or wording of similar effect.</p>
Policy CS3	<p>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 port uses and activities so as to ensure that they are protected.</p> <p>The Port of Ipswich is situated both within and immediately adjoining the Waterfront area of IP-One. As well as maintaining its operational activities, ABP is concerned to ensure that it retains the right and ability to fully use its land and infrastructure for port purposes in the performance of its statutory duties and responsibilities as a harbour undertaking. The importance of the Port continuing to flourish as a major economic driver in the sub-region is recognised in the NALP Strategic Economic Plan and at paragraphs 3.3, 5.6, 6.20, 8.171 – 8.172, 8.174 and 9.33.5 – 9.33.6 (consistent with the advice in the Ports NPS). ABP would wish to ensure that the Port's 'significant (economic) role' and ability to expand further and assist in driving growth in the region is protected.</p> <p>ABP requests that recognition is made in Policy CS3 and its accompanying text to the Port and to other important existing employment and other activities within and adjoining the IP-One area which the Council wishes to safeguard and support. New development should be sensitive to these existing uses and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.</p> <p>We request, therefore, the addition of a new criterion into any new policy based on Policy CS3:</p> <p><i>"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."</i></p> <p>We note and support the inclusion of similar wording to this effect in Policy CS13.</p>
Policy CS8 and para 8.121	<p>ABP welcomes IBC's policy on housing type and tenure mix and the recognition of potential exceptions to these requirements in response, for example, to viability constraints. ABP also notes the desire of IBC to secure high density development on central sites (para 8.121) which will also assist viability. However, high density may not be appropriate in all instances.</p>

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

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

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

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Plan 2 – Flood Risk	The Flood Risk areas defined on Plan 2 reflect, we understand, the definitive Flood Maps maintained and published by the Environment Agency. However, whilst the Environment Agency Flood Maps distinguish between Zone 3 and Zone 3 with tidal flood defence, Plan 2 does not. Given that it is the Environment Agency who are responsible for the update of these Maps (and that the frequency of these updates may not coincide with updates/reviews to the Local Plan), we request that Plan 2 and/or the Core Strategy and Policies Development Plan Document should include a note making clear that the flood zones shown on Plan 2 are indicative and that IBC will rely on the current Environment Agency Flood Maps to determine what flood risk zone any site may fall within for decision making purposes.

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.
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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.

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Consultation document(s) to which this comments form relates:	Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft
Please return this comments form to:	planningpolicy@ipswich.gov.uk or Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
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	Part B – Your comment(s).

PART A PERSONAL DETAILS		
	1. Personal details	2. Agent's details (if applicable)
Title		Mr
First name		John
Last name		Bowles
Job title (<i>where relevant</i>)		Director
Organisation (<i>where relevant</i>)	Associated British Ports	Savills
Address (<i>Please include post code</i>)	Ipswich Port	33 Margaret Street London W1G 0JD
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):	Savills on behalf of Associated British Ports ('ABP')
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	<p>ABP is the owner and operator of the Port of Ipswich which is the UK's leading grain exporter and largest of ABP's short-sea ports and which, together with ABP's other East Anglian Ports at Kings Lynn and Lowestoft, contributes some £360m directly into the UK economy every year and supports 3,700 jobs in the region and 5,300 jobs nationally (2019 figures).</p> <p>The Port of Ipswich provides an extensive range of facilities to meet the needs of businesses and industry based in Norfolk and Suffolk. It is the UK's leading grain exporter and largest of ABP's short-sea ports with the ability to handle containers, dry bulks and aggregates, forest products, general cargo and offering extensive roll-on roll-off facilities. The total port area (including water) is approximately 111 ha (275 acres) and the Port handles more than three million tonnes of goods per year. The Port is rail connected and can offer intermodal services from the Port to inland facilities including rail terminals such as ABP's own Hams Hall Railfreight Terminal in the Midlands. The Port is also the base for expanding marina activities.</p> <p>The importance of the Port continuing to flourish as a major economic driver in the sub-region and its 'significant role' in driving further growth in the region through future expansion is recognised in the NALP Strategic Economic Plan and the adopted Core Strategy.</p> <p>As well as maintaining its operational activities, ABP is concerned to ensure that it retains the right and ability to fully use its land and infrastructure for port purposes in the performance of its statutory duties and responsibilities as a harbour undertaking. Whilst, therefore, ABP is keen to support the realisation of the wider development objectives and aspirations of the Site Allocations and Policies DPD Review, it must protect its 'significant (economic) role' and ability to expand further and assist in driving growth in the region. New development should be sensitive to these existing uses and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.</p> <p>The 'Island Site', which is identified by Ipswich Borough Council (IBC) and its partners as one of the key regeneration opportunities in central Ipswich, is within ABP's land ownership and presently accommodates successful high profile marine businesses and the commercially successful Ipswich Haven Marina (which has contributed significantly to the regeneration so far of the Waterfront area).</p> <p>ABP is supportive of the redevelopment of the Island Site (it is one of ABP's 'pathfinder projects') subject to its redevelopment being commercially viable and deliverable. ABP's vision for 'Ipswich Island' is that it will be a viable, high quality, sustainable, residential led mixed use development that maximises its waterfront location. The development will be true mixed use, incorporating (alongside homes); boat building, other maritime activities and leisure uses, enhancing connectivity between the site, the Town Centre and the Station as well as around the Waterfront (including via a new circular Maritime Trail).</p> <p>However, until a satisfactory scheme is agreed with IBC for its redevelopment, ABP reserves the right to continue to use the Island Site as operational port area.</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>and to restrict access in the interests of public safety and port security.</p> <p>ABP's representations on the Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD Review Final Draft below are made in this context.</p>
Policy SP1	<p>ABP supports the safeguarding of sites for the uses they for which have been allocated, subject to the recognition that where sites (such as the Island Site) are in existing use and are allocated for alternative use(s), redevelopment will be dependent on commercial viability. Until a satisfactory scheme is agreed with IBC for redevelopment, such sites should reasonably be able to continue in their existing use. In the case of the Island Site, ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.</p>
Policy SP2	<p>ABP supports the allocation of the Island Site as Site IP037 for residential use or residential-led mixed use.</p> <p>The amount and proportion of land appropriate for residential use will be determined through the preparation of a detailed masterplan) and ABP notes and supports the references at paragraphs 4.7 and 4.10 that the figures included in table 1a listed in the Policy are "<i>indicative</i>". ABP will work with IBC to agree a deliverable masterplan for the Island Site which aims to deliver the Council's regeneration objectives subject to commercial viability.</p> <p>In that context, and based on based on ABP's vision and present thinking, the indicative capacity of 421 homes @ 100 dwellings per hectare stated in the Policy is considered to be high. We consider that the Island Site will deliver a reduced density of approximately 150 units.</p> <p>For the reasons set out in ABP's representations in respect of CS&P DPD Review Final Draft Policy CS20, we do not consider it appropriate for Policy SP2 to refer to the need for "<i>additional vehicular ... access (including emergency access)...to be provided to enable the site's development</i>". This is a matter which should be addressed in the masterplan preparation exercise and we would ask for this reference to be removed.</p> <p>The 'Island Site' presently accommodates successful high profile marine businesses and the commercially successful Ipswich Haven Marina (which has contributed significantly to the regeneration so far of the Waterfront area). ABP is supportive of the redevelopment of the Island subject to its redevelopment being commercially viable and deliverable. Until a satisfactory scheme is agreed with IBC for its redevelopment, however, ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.</p>
Policy SP6	<p>ABP objects to the requirement that the Island Site provides 15% open space which is more than the minimum amount of on-site public open space provision required through Core Strategy Review Policy DM6. Until the completion of the masterplan exercise and the necessary technical assessments accompanying it, it is not appropriate for the DPD to be so prescriptive about the amount of open space to be provided and we would request the removal of reference to it.</p>
Policy SP7	<p>ABP supports the Council's position that the amount of land for leisure or community uses on the Island Site should be determined through masterplanning. Whether there is a need to make provision for early years facilities is a matter best addressed through that masterplanning exercise.</p>

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

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<p>Policy SP9</p>	<p>ABP objects to the inclusion in the allocation for Site IP037 of the need for <i>“additional vehicular access to the Island Site to enable the site’s development”</i>.</p> <p>The extent to which the existing route via St. Peter’s Dock can accommodate vehicle access, and any need for additional vehicular access, will depend on the amount of development that can acceptably and viably be accommodated on the Island. This will need to be established through the masterplan exercise referred to on Site Sheet IP037. Until the completion of the masterplan exercise and the necessary technical assessments accompanying it (including transport assessment as referenced on Site Sheet 037), it is not appropriate for the DPD to be so prescriptive about the need for additional vehicular access and we would request the removal of reference to it.</p> <p>Whilst ABP is supportive of the redevelopment of the Island Site (it is one of ABP’s ‘pathfinder projects’), its delivery is dependent on commercial viability. Until a satisfactory scheme is agreed with IBC for its redevelopment, ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.</p> <p>ABP also objects to the inclusion in the allocation for Site IP037 of the wording that the <i>“development layout should not prejudice future provision of a Wet Dock Crossing”</i>. Whilst ABP remains supportive of IBC’s intention to continue to make a case for highway improvements including a Wet Dock Crossing through the Local Transport Plan (see comments on CS&P DPD Review Final Draft Policy CS20), given that there is no formal commitment to this Crossing it is not appropriate for Policies Map IP – One Area Inset to define an alignment of a potential route for a Wet Dock Crossing at this stage and for Policy SP9 to effectively safeguard this alignment. Whilst this may not be the intention of the wording of the Policy and Inset Map, both are capable of interpretation in this way. ABP requests, therefore, appropriate amendment to Policy SP9 and/or Policies Map IP – One Area Inset.</p>
<p>Policy SP11 and para 5.21</p>	<p>ABP supports Policy SP11 and welcomes the recognition at para 5.21 of the need for new development to take account of the Port’s operational needs.</p>
<p>Policy SP15</p>	<p>ABP supports the aspiration for a safe cycle and pedestrian access across the lock gates at the entrance to the Wet Dock to create a circular route subject to viability and ensuring Port operations are not compromised.</p> <p>ABP also supports the provision of new foot and cycle bridges across the New Cut linking Stoke Quay to St Peter’s Wharf and the Island site to Felaw Street subject to the provision of such bridges being supported by public funding.</p>
<p>Policy SP16</p>	<p>ABP welcomes the intention of IBC to continue to make a case for highway improvements including a Wet Dock Crossing through the Local Transport Plan (see comments on CS&P DPD Review Final Draft Policy CS20). However, in the context of the development of the Island Site (IP037), and as recognised at para 5.42 and at para 8.243 of the CS&P DPD Review Final Draft, provision of a Wet Dock Crossing is not a pre-requisite to enable development of the Island Site.</p> <p>ABP does not agree with inclusion of the statement at para 5.42 that <i>“which as a minimum will require a road bridge from the west bank to the Island Site... to enable any significant development”</i>. We request its removal. The extent to which the existing route via St. Peter’s Dock can accommodate vehicle access, and any need for additional road access, will depend on the amount of development that can acceptably and viably be accommodated on the Island. This will need to be established through the masterplan exercise referred to in Final Draft Policy SP2</p>

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	<p>and accompanying Site Sheet IP037. Indeed, based on present thinking that the Island Site will deliver a reduced density of approximately 150 units, additional vehicular access may not be needed.</p> <p>Until the completion of the masterplan exercise and the necessary technical assessments accompanying it (including transport assessment as referenced on Site Sheet 037), it is not appropriate for the DPD to be so prescriptive about the need for a new road bridge and we would request the removal of reference to it.</p> <p>ABP's general support for access improvements in and around the Waterfront and onto the Island Site is conditional upon there being no operational impact on the Port. ABP will continue to work with and assist SCC, IBC and its partners in securing a development solution which addresses all port safety, security and operational issues and avoids any adverse impact on port and marine operations, and which accommodates the existing marina and marine businesses in the future development of the Island Site so that they continue to contribute to an active and appealing waterfront environment for further regeneration.</p>
<p>Para 6.1 Opportunity Area guidance</p>	<p>ABP notes and welcomes the statement that the Opportunity Area descriptions, development principles and plans will act as concept plans to guide the development strategically that is expected to take place, and that they should be adhered to unless evidence submitted with applications indicates that a different approach better delivers the plan objectives. ABP also notes the statement that the allocation policies of the DPD take precedence over the Opportunity Area guidance and site sheets. In that context, ABP notes that there are discrepancies between these respective parts of the DPD which would benefit from clarification.</p> <p>In that context, ABP notes and makes the following comments to references in the text under "Opportunity Area A – Island Site" as follows:</p> <p>Under 'Development Opportunities'</p> <ul style="list-style-type: none"> • Concern about the amount of green areas including reinstatement of the tree lined promenade required • The old lock gate area is not suitable for leisure uses • Live Work units may not be viable in this location • Office use (other than small scale) is not considered appropriate in this location • The potential for small scale retail / café / restaurants will be subject to viability and market demand • A heritage /culture based visitor attraction is not considered appropriate here • The amount of public open space (see comments to Policy SP6 above) <p>Under 'Development Principles'</p> <ul style="list-style-type: none"> • The retention of historic structures may be unviable to retain • Reinterpretation of the historic lock as a focus to new public space may not be compatible with operational and safety requirements • Generally low to medium rise development (3, 4 and 5 storeys) • The requirement for vehicular access (including 73 emergency vehicles) and bridge across New Cut to link to Felaw Street is yet to be established and may not be necessary • What is meant by "<i>prejudice to the potential provision of a full Wet Dock Crossing</i>" needs to be better understood in the context of this being no more than an aspiration • Layout to facilitate location of new foot/cycle bridge from New Cut to St Peter's Wharf (it is not clear what this means)

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	<ul style="list-style-type: none"> • Ensure suitable public transport provision (it is not clear how this is expected to be achieved) <p>ABP requests correction and clarification of these matters in the guidance.</p>

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Public Consultation for the Ipswich Local Plan Review Final Draft

15th January 2020 – 2nd March 2020

Planning and Compulsory Purchase Act 2004

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

Consultation Comments Form



e-mail:
planningpolicy@ipswich.gov.uk

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

website:
www.ipswich.gov.uk

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

PART A PERSONAL DETAILS		
	1. Personal details	2. Agent's details (if applicable)
Title		Mr
First name		John
Last name		Bowles
Job title (<i>where relevant</i>)		Director
Organisation (<i>where relevant</i>)	Associated British Ports	Savills
Address (<i>Please include post code</i>)	Ipswich Port	33 Margaret Street London W1G 0JD
E-mail		J n
Telephone No.		i

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

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

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.</p> <p>ABP's representations on the Local Plan Policies Maps Final Draft below are made in this context.</p>
Policies Map IP – One Area Inset	<p>For the reasons set out in ABP's representations in respect of CS&P DPD Review Final Draft Policy CS20 and Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Policy SP9, ABP objects to the inclusion on the IP – One Inset Map of a route for the Wet Dock Crossing. Whilst ABP remains supportive of IBC's intention to continue to make a case for highway improvements including a Wet Dock Crossing through the Local Transport Plan (see comments on CS&P DPD Review Final Draft Policy CS20), given that there is no formal commitment to this Crossing it is not appropriate for Policies Map IP – One Area Inset to define an alignment of a potential route for a Wet Dock Crossing at this stage and for Policy SP9 to effectively safeguard this alignment. Whilst this may not be the intention of the wording of the Policy and Inset Map, both are capable of interpretation in this way. ABP requests, therefore, appropriate amendment to Policy SP9 and/or Policies Map IP – One Area Inset.</p>

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

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

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

RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

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

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

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