**Minerals and Waste Local Plan Publication Stage Representation Form**

**Page 1: Suffolk Minerals and Waste Local Plan Publication Stage Representation**

<table>
<thead>
<tr>
<th>Q1. Please state if you are responding:</th>
<th>As an agent</th>
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<tr>
<th>Q2. Personal Details:</th>
<th>No Response</th>
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<tr>
<th>Q3. Agent's Details:</th>
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<tbody>
<tr>
<td><strong>Title</strong></td>
<td>Mrs</td>
</tr>
<tr>
<td><strong>First Name</strong></td>
<td>Sarah</td>
</tr>
<tr>
<td><strong>Last Name</strong></td>
<td>Barker</td>
</tr>
<tr>
<td><strong>Job Title</strong> (where relevant - if this is not relevant, please write N/A)</td>
<td>Senior Planning Officer</td>
</tr>
<tr>
<td><strong>Organisation</strong> (where relevant - if this is not relevant, please write N/A)</td>
<td>Ipswich Borough Council</td>
</tr>
<tr>
<td><strong>Address Line 1</strong></td>
<td>Grafton House</td>
</tr>
<tr>
<td><strong>Address Line 2</strong></td>
<td>Russell Road</td>
</tr>
<tr>
<td><strong>Address Line 3</strong> (if this is not required, please write N/A)</td>
<td>Ipswich</td>
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<tr>
<td><strong>Address Line 4</strong> (if this is not required, please write N/A)</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Post Code</strong></td>
<td>IP1 2DE</td>
</tr>
<tr>
<td><strong>Telephone Number</strong> (if you do not wish to provide this information, please write N/A)</td>
<td><strong>[REDACTED]</strong></td>
</tr>
<tr>
<td><strong>Email address</strong> (where relevant - if this is not relevant, please write N/A)</td>
<td><strong>[REDACTED]</strong></td>
</tr>
<tr>
<td><strong>Name and address of the person or organisation you are acting as an agent for</strong></td>
<td>Ipswich Borough Council</td>
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<tr>
<th>Q4. To which part of the Local Plan does this representation relate?</th>
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<tbody>
<tr>
<td><strong>Paragraph</strong></td>
<td>-</td>
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<tr>
<td><strong>Policy</strong></td>
<td>WP4</td>
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<tr>
<td><strong>Policies Map</strong></td>
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Q5. Do you consider the Local Plan is

<table>
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<tr>
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<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>(1) Legally compliant</td>
<td></td>
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</tr>
<tr>
<td>(2) Sound</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>(3) Complies with the Duty to co-operate</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Q6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The submission draft plan does not address the concerns raised at Preferred Options stage and the Submission Draft continues to safeguard HWRC6 and CB5 at Portman’s Walk/Sir Alf Ramsey Way in Ipswich. The Borough boundary is drawn very tightly and the partner authorities within the Ipswich Housing Market Area will expect Ipswich Borough Council to explore all redevelopment opportunities that may exist within the core of the town to meet the Borough’s housing need. The site opposite, Bus Depot, Sir Alf Ramsey Way/West End Road, is already a mixed use allocation through the adopted Ipswich Local Plan, 2017 (IP004) The two sites safeguarded by the M&W plan – HWRC6 and CB5 – may represent important opportunities for residential development during the Ipswich Local Plan period to 2036. The Borough Council would welcome the opportunity to plan positively with Suffolk County Council for the relocation of these facilities and subsequent re-use of the land for housing.

Q7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Add within the WP4 policy box an additional clause... The County Council will accept development proposals on safeguarded sites where they have been promoted through a local plan process and an alternative facility has been provided. Alternatively, an amendment to Para 6.12 may be sufficient... HWRC will be safeguarded by the terms of WP18 unless their re-use has been promoted and an alternative facility provided as part of a Local Plan process.

Q8. SCC Response

No Response

Q9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

Q10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

If the Council’s amendments cannot be accepted some consideration of the related matters raised would be appropriate.
Q1. Please state if you are responding:
As an agent

Q2. Personal Details:
No Response

Q3. Agent’s Details:
Title Mrs
First Name Sarah
Last Name Barker
Job Title (where relevant - if this is not relevant, please write N/A) Senior Planning Officer
Organisation (where relevant - if this is not relevant, please write N/A) Ipswich Borough Council
Address Line 1 Grafton House
Address Line 2 Russell Road
Address Line 3 (if this is not required, please write N/A) Ipswich
Address Line 4 (if this is not required, please write N/A) N/A
Post Code IP1 2DE
Telephone Number (if you do not wish to provide this information, please write N/A) 01473 432937
Email address (where relevant - if this is not relevant, please write N/A) sarah.barker@ipswich.gov.uk

Name and address of the person or organisation you are acting as an agent for
Ipswich Borough Council

Q4. To which part of the Local Plan does this representation relate?
Paragraph -
Policy WP4
Policies Map -

Q5. Do you consider the Local Plan is
Yes (1) Legally compliant
No (2) Sound
X (3) Complies with the Duty to co-operate

Q6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.
The submission draft plan does not address the concerns raised at Preferred Options stage and the Submission Draft continues to safeguard HWRC6 and CB5 at Portman's Walk/Sir Alf Ramsey Way in Ipswich.
The Borough boundary is drawn very tightly and the partner authorities within the Ipswich Housing Market Area will expect Ipswich Borough Council to explore all redevelopment opportunities that may exist within the core of the town to meet the Borough's housing need. The site opposite, Bus Depot, Sir Alf Ramsey Way/West End Road, is already a mixed use allocation through the adopted Ipswich Local Plan, 2017 (IP004)
The two sites safeguarded by the M&W plan – HWRC6 and CB5 – may represent important opportunities for residential development during the Ipswich Local Plan period to 2036.
The Borough Council would welcome the opportunity to plan positively with Suffolk County Council for the relocation of these facilities and subsequent re-use of the land for housing.

Q7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Add within the WP4 policy box an additional clause... The County Council will accept development proposals on safeguarded sites where they have been promoted through a local plan process and an alternative facility has been provided. Alternatively, an amendment to Para 6.12 may be sufficient ...
HWRC will be safeguarded by the terms of WP18 unless their re-use has been promoted and an alternative facility provided as part of a Local Plan process.

Q8. SCC Response
No Response

Q9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?
Yes, I wish to participate at the oral examination

Q10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
If the Council's amendments cannot be accepted some consideration of the related matters raised would be appropriate.

Q11. Your details:
Name Sarah Barker
Date 19/07/2018
Dear Andrew,

Thank you for the support on the acronyms – We have now made submissions for the IBC in Sarah Barker’s name.

As the submissions look a bit short or terse due to the format of the survey vehicle, Sarah has asked me to submit the document from which we cut and pasted our submissions. It contains the explanatory and contextual commentary that we were unable to submit. Any issues arising please contact me or Sarah,

Many Thanks
Wharf protection – Aim 3 and Objective 8 on page 9 then Para 4.10 and Para 5.22

The West Bank Terminal and Cliff Quay wharves are safeguarded and this is supported. However, the relationship with the Upper Orwell crossings should be addressed in the supporting text to either ensure their retention / inclusion in future design work or to ensure that acceptable alternative locations are agreed prior to the commencement of the design projects.

Alteration suggested

Add to end of sentence 5.18 “All railheads and wharves handling crushed rock are safeguarded within the Plan from other forms of competing development” … unless their use or part use is required as part of an infrastructure programme delivered through a local plan process.

Page 26 - The Policy MP9 - Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt and recycled materials

The policy MP9 and the supporting text deals with the protection of sites for the manufacture of concrete, asphalt and recycled materials. The Borough Council is supportive of the policy, but raises objection to the effect of the Policy on its earlier submission at Preferred Options stage concerning the Concrete Batching Plant (CB5), Sir Alf Ramsey Way, Ipswich. In the earlier submission the Council suggested relocation for site CB5 as follows – “this site is a ready mix concrete plant; given that it relies on aggregates, this site should be encouraged to relocate to the port area.”

(Note: The Council has also made a related submission concerning the Household Waste Recycling Centre, HWRC6, on nearby land and which the Council believes should be jointly planned in a comprehensive manner and a separate submission is made in that respect.)

In the absence of there being some recognition of the Council’s ambition to upgrade this part of the river front in Ipswich, The Council has agreed to submit an objection, as follows:

The submission draft plan does not address the concerns raised at Preferred Options stage and the Pre-Submission Draft continues to safeguard HWRC6 and CB5 at Portman’s Walk/Sir Alf Ramsey Way in Ipswich. The Borough boundary is drawn very tightly and the partner authorities within the Ipswich Housing Market Area will expect Ipswich Borough Council to explore all redevelopment opportunities that may exist within the core of the town to meet the Borough’s housing need. The site opposite, Bus depot, Sir Alf Ramsey Way/West End Road, is already a mixed use allocation through the adopted Ipswich Local Plan, 2017 (IP004). The two sites safeguarded by the M&W plan – HWRC6 and CB5 – may represent important opportunities for residential development during the Ipswich Local Plan period to 2036. The Borough Council would welcome the opportunity to plan positively with Suffolk County Council for the relocation of these facilities and subsequent re-use of the land for housing.

Alteration suggested:

Add within the MP9 policy box an additional clause… The County Council will accept development proposals on safeguarded sites where they have been promoted through a local plan process and an alternative facility has been provided.
Aim 3 and Objective 8 Para 6.12 and Policy WP4 - Household waste recycling centres

The Council supports the terms of the Policy WP4 as worded because it provides for the identification of alternative HWRCs. However, as identified in the related matter of Concrete Batching Plant (CB5), Sir Alf Ramsey Way, Ipswich the Council objects to the safeguarding of the site HWRC6 for the reasons identified in the Preferred Options stage.

‘It is acknowledged that there are limited existing waste related sites in Ipswich Borough Council administrative area. However, the Council has for a number of years supported the relocation of the Sir Alf Ramsey Way/West End Road recycling plant. As you are no doubt aware, the Borough is not able to accommodate sufficient residential allocations within its boundaries to meet its housing need. This site has been championed as a potential housing site for a number of years and little progress has been made. For example, it was previously identified as a potential development site in the 2007 IP-One Area Action Plan Preferred Options. It would be useful if this ambition could be positively supported by the county as it is not located in an area suitable for such a use in the short to medium term.’

(Note: The Council has also made a related submission concerning the Household Waste Recycling Centre on nearby land and which the Council believes should be jointly planned in a comprehensive manner and a separate submission is made in that respect.)

In the absence of there being some recognition of the Council’s ambition to upgrade this part of the river front in Ipswich, The Council has agreed to submit an objection as follows:

The submission draft plan does not address the concerns raised at Preferred Options stage and the Submission Draft continues to safeguard HWRC6 and CB5 at Portman’s Walk/Sir Alf Ramsey Way in Ipswich. The Borough boundary is drawn very tightly and the partner authorities within the Ipswich Housing Market Area will expect Ipswich Borough Council to explore all redevelopment opportunities that may exist within the core of the town to meet the Borough’s housing need. The site opposite, Bus Depot, Sir Alf Ramsey Way/West End Road, is already a mixed use allocation through the adopted Ipswich Local Plan, 2017 (IP004) The two sites safeguarded by the M&W plan – HWRC6 and CB5 – may represent important opportunities for residential development during the Ipswich Local Plan period to 2036. The Borough Council would welcome the opportunity to plan positively with Suffolk County Council for the relocation of these facilities and subsequent re-use of the land for housing.

As this site might also be subject to the safeguard of Policy WP18 a separate objection is submitted but could be read in conjunction with the above.

Add within the WP4 policy box an additional clause... The County Council will accept development proposals on safeguarded sites where they have been promoted through a local plan process and an alternative facility has been provided. Alternatively, an amendment to Para 6.12 may be sufficient ... HWRC will be safeguarded by the terms of WP18 unless their re-use has been promoted and an alternative facility provided as part of a Local Plan process.

Para 6.34 and Policy WP18

The Council supports the terms of the Policy WP18 as worded because it provides appropriate safeguards for Waste Management sites during the plan period. However, as identified in the
related matter of Concrete Batching Plant (CBS), Sir Alf Ramsey Way, Ipswich the Council objects to the safeguarding of the site HWRC6 for the reasons identified in the Preferred Options stage.

‘It is acknowledged that there are limited existing waste related sites in Ipswich Borough Council administrative area. However, the Council has for a number of years supported the relocation of the Sir Alf Ramsey Way/West End Road recycling plant. As you are no doubt aware, the Borough is not able to accommodate sufficient residential allocations within its boundaries to meet its housing need. This site has been championed as a potential housing site for a number of years and little progress has been made. For example, it was previously identified as a potential development site in the 2007 IP-One Area Action Plan Preferred Options. It would be useful if this ambition could be positively supported by the county as it is not located in an area suitable for such a use in the short to medium term.’

(Note: The Council has also made a related submission concerning the Concrete Batching Plant (CBS), Sir Alf Ramsey Way, Ipswich, on nearby land and which the Council believes should be jointly planned in a comprehensive manner and a separate submission is made in that respect.)

In the absence of there being some recognition of the Council’s ambition to upgrade this part of the river front in Ipswich, The Council has agreed to submit an objection as follows:

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As this site might also be subject to the safeguard of Policy WP4 a separate objection is submitted but could be read in conjunction with the above.

Add within the WP18 policy box an additional clause... The County Council will accept development proposals on safeguarded sites where they have been promoted through a local plan process and an alternative facility has been provided. Alternatively, an additional sentence for Para 6.34 may be sufficient ... HWRCs will be safeguarded by the terms of WP18 unless their re-use has been promoted and an alternative facility provided as part of a Local Plan process.