

Town Centre and Waterfront – Public Realm Strategy Supplementary Planning Document, Consultation Statement, April 2019

Town and Country Planning (Local Development) Regulations 2012 Consultation Statement in accordance with Regulation 12(a).

1. The Town and Country Planning (Local Development) Regulations 2012 stipulate in regulation 12(a) that, before adopting a supplementary planning document, the local planning authority must prepare a statement setting out:

- i) The persons the local planning authority consulted when preparing the supplementary planning document;
- ii) A summary of the main issues raised by those persons, and;
- iii) How those issues have been addressed in the supplementary planning document.

2. In accordance with regulation 12(a), this statement outlines the persons and organisations consulted in preparing the Town Centre and Waterfront Public Realm Strategy Supplementary Planning Document (SPD) and sets out the responses received to the consultation and how the issues raised have been addressed in the final version of the document. There have been two stages in the preparation of the Public Realm Strategy SPD which have involved full public consultation. These are:

- The Call for Ideas – ideas were sought on both the scope of the SPD and what it should cover and aspects of the Core Strategy policy approach to the public realm; and
- Full Public Consultation on the Draft Town Centre and Waterfront Public Realm Strategy SPD document once it had been prepared.

Information on how the views of individuals and organisations were sought is included in notes below. A summary of main points raised in consultation responses and the response of the Council to these points is presented in tabular form under each consultation stage, with the most recent first.

Consultation on the draft Town Centre and Waterfront Public Realm Strategy SPD 16th January and 27th February 2019.

The consultation was carried out in accordance with the Ipswich Borough Council Statement of Community Involvement Review March 2018. It included:

- making the document available for inspection on the website and as a hard copy at specified venues, together with supporting documents;
- alerting everyone on the Council's Local Plan mailing list to the consultation;
- alerting people to the consultation through the Council's social media channels;
- publishing a notice of consultation advising where and when comments may be made;
- placing a public notice in the local press; and

- publishing Strategic Environmental Assessment and Habitats Regulations Assessment screening reports.

The Council's Local Plan mailing list includes the specific consultation bodies and general consultation bodies specified through regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which includes Historic England. It also includes private individuals who have opted to be notified of Local Plan matters (see also Appendix 1 to the Statement of Community Involvement Review March 2018

https://www.ipswich.gov.uk/sites/default/files/statement_of_community_involvement_review.pdf).

The table below sets out the feedback from the full public consultation on the draft Town Centre and Waterfront Public Realm Strategy SPD carried out between 16th January and 27th February 2019, and the Council's response indicating whether and where the document has been amended.

Table 1 Consultation comments received on the draft Town Centre and Waterfront Public Realm Strategy SPD.

Respondent	Comment	IBC response
Private individual 1	With regards to the £3million on hold may I suggest that some of it be used to revamp the Corn Hill.	Not relevant to the draft SPD. The comment offers an opinion on recently completed public realm works in the Cornhill.
Private individual 2	List in order in my opinion: 1 & 2) at same time if poss ie Arras Square- near to Historic heart and incorporating T I, plus Princess St bridge-important for first impressions from town centre rail station. 3)Lloyds Ave-very desirable aim. 4)Majors corner-very long term.	Not relevant to the draft SPD. The comment offers an opinion on a shortlist of preferred sites for public realm investment, following a separate consultation exercise by IBC.
Private individual 3	I feel that the best place to improve would be Arras Square. The TIC is much used and gives a good impression to visitors. The outside ought to do the same. A play area outside St Lawrence might be good but outside the old SSooffice at Tower st would be bigger and perhaps more open. What is really needed for visitors to Ipswich by private coach is a loo at Crown St lay-by or somewhere very near.	The Arras Square comment refers to a separate IBC consultation on preferred sites for public realm investment. The suggestion of a play area at St Lawrences is contained within the draft document at page 43 (Key Location Project X). The space in front of the former SCC office at Tower St is private land and currently used for carparking.
Private individual 4	I think the area most in need of investment is Arras Square	Not relevant to the draft SPD. The comment offers an opinion on a shortlist of preferred sites for public realm investment, following a separate consultation exercise by IBC.

Respondent	Comment	IBC response
Private individual 5	<p>1. I welcome the plan overall and agree with statements in the introduction about the wealth of public realm assets including the historic townscape and buildings. I endorse the ambition to make Ipswich a more beautiful place – the potential is there. Currently the vibrancy of the town centre is also more in its potential than reality.</p> <p>1.6 I welcome and endorse the key deliverable themes, especially for greater connectivity and identity, but in some areas the proposals don't go far enough. I have a concern that while individually laudable, the multitude of small projects may result in a patchwork of good and bad parts, and fail to achieve the larger vision for coherence, identity and beauty.</p> <p>1.9 The nine themes are clear but there are too many. Consider focusing on 'designing for people' and 'prioritising walking' as these would deliver on all the other themes. There is a conflict between the objectives of 'prioritising walking' and 'balancing vehicular movement' in failing to address the out-dated, damaging, dangerous and ugly gyratory system that divides the town from the waterfront as identified in the Allies and Morrison "Ideas for Ipswich" document published in 2018.</p> <p>It would be so disappointing to improve pedestrian access across the derelict St Peter's Port area to be met by HGVs and other traffic cramped into the narrow College Street / Key Street. Pedestrianising College Street and making Star Lane 2-way is the single most effective measure to make Ipswich more beautiful, enhance its identity and develop north/south connectivity.</p> <p>Some suggestions for strengthening identity and north-south connectivity:</p> <ul style="list-style-type: none"> • Ensure visual coherence, de-cluttering, and celebrate the heritage of the medieval town • Making College Street / Key Street pedestrian also offers the opportunity to make a pedestrian route from Fore Street, Salthouse Street and through to Wherry Lane, going from the heart of the town to the heart of the Waterfront. This would enlarge and enhance the sense of public realm and public life, and encourage greater use of the East side of the Waterfront. 	<p>i) The comment about SPD paragraph 1.6 refers to the strategic aspects of the document. Appendix 1 addresses this comment through the identification of 'Street Types' which share design characteristics which can be reinforced through issues such as surfacing design, street lighting, street furniture.</p> <p>ii) The comment about paragraph 1.9 raises some long term issues about the highways design of the town centre which are beyond the strict scope of the SPD, even if they ultimately have a direct impact upon the functioning of the public realm. The redesign of the waterfront gyratory would undoubtedly improve north-south pedestrian connectivity as well as enhancing the east-west waterfront corridor, but the proposal involves significant redesign of the vehicle circulation network, on a scale not currently being contemplated. The SPD could, however, have a significant impact upon future highways strategies that might address this issue.</p> <p>iii) Pedestrian prioritisation suggestions:</p> <p>Zebra / toucan crossings. The design and placement of crossings is an SCC (Suffolk County Council) issue, as the Highways Authority. The concerns expressed in the comment will be referred to SCC.</p> <p>Prohibition of HGVs between certain times. HGV access for loading and unloading is already restricted within pedestrianised areas between</p>

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	<p>Some suggestions for prioritising walking:</p> <ul style="list-style-type: none"> • Within the SPD designated area make all pedestrian crossings Zebra Crossings with Toucans retained for vulnerable people and those with sight impairments. In my experience, Zebras have a traffic calming impact with drivers taking note of what is happening around them rather than racing to beat the Toucan lights. Drivers can vary their speed as they approach Zebras and therefore often don't need to stop, and certainly don't need to stop when pedestrians have already crossed in a break in traffic. Toucans should also have a maximum wait of 10 seconds in build up areas to change in favour of pedestrians – longer waits encourage them to take risks in crossing. • Prohibit lorries and HGVs driving through the town at certain times, eg rush hours, limit them to 10.00am and 3.00pm. • The vibrancy of the town centre is inhibited by the cost of car parking which is charged by the hour. In contrast, drivers can park in out-of-town retail parks for free for as long as they like. The playing field could be partially balanced by introducing free parking in a couple of carparks during the daytime. I have yet to see a full carpark in Ipswich and this contributes to a dismal sense of decline. • Ban 'A boards' on pavements – they contribute to visual clutter and present hazards to pedestrians on narrow pavements <p>Some suggestions for designing for people:</p> <ul style="list-style-type: none"> • Ensure coherence and quality of design across the SPD area • Provide consistent hanging signs for independent businesses along St Peter's Street, Fore Street and other historic streets – this has been done in certain streets in London, eg Lamb's Conduit Street and effectively enhances the identity, beauty and consistency of the area • Consistent road and pavement surfaces – using the same materials across the whole area adds to coherence; consistent / coherent design of seating, lighting and sea-gull-proof waste bins • Avoid 'trails' embedded into pavements etc as they soon become dated, plaques on buildings celebrate the town's heritage more effectively and can be included in paper-based 'walking trails' • Consider the quality of public art and see it as contributing to the character of the town. It may 	<p>10:30 and 4:30. This will be extended if the pedestrianised areas of the town centre are extended. Restricting HGV access on the public roads within the town centre is an SCC highways issue beyond the scope of the SPD. The concerns expressed in the comment will be referred to SCC.</p> <p>Car parking costs. Only a proportion of town centre carparks are owned by IBC. Council owned parking is generally cheaper than private parking, but the Council has to generate an income from its assets. In addition, the distortion of demand that would be created through free parking would make vehicle movements within the town centre more difficult to manage. The Council is, however, aware of the need to meet the demand for parking, and is currently conducting a carparking strategy which will govern the future planning of new parking provision.</p> <p>A boards on pavements. Planning consent is required for A-boards placed on the pavement. It is only permitted to place them, without consent, on private business forecourts. IBC, as the planning authority, would refuse an application for boards which blocked the highway or caused unnecessary visual clutter.</p> <p>Hanging signs. The Council's shopfront design SPD provides guidance on the design of this kind of advertising. It does not attempt to enforce identical sign dimensions, as there is no consensus for this approach in any of the town's commercial areas, but sets standards (especially in our more historic</p>

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	<p>be that a small number of pieces that are quirky, human scale and light-hearted – along the lines of the Giles statue would do more for the town’s identity than any more meaningless or obscure pieces like the concrete pillars in the Cornhill</p> <p>i. St Peter’s Dock – greatly welcome and entirely endorse plan to realign the pedestrian crossing east / west over Stoke Bridge to connect Grafton Way and St Peter’s Dock and the provision of a pedestrian route connecting to Wolsey’s Gate, which would be much more attractive if College Street was no longer a dual carriage-way race track. North-south connections are entirely focused on the west end of the Waterfront, currently the least attractive area and mainly still derelict. A pedestrian route along Fore Street, Salthouse Street and Wherry Lane would create new connections further West, nearer the University and embrace some of the gems of Ipswich.</p> <p>11. Bridge Street Gateway – the Star Lane Gyratory is the single biggest problem and barrier to north-south connectivity, is damaging to the historic buildings along College Street, inhibits development of the derelict sites at the entrance to the Waterfront, as well as being ugly and dangerous. Zebra crossings would be better than Toucan crossings.</p> <p>iii. St Peter’s Port area – welcome the ambition to address the derelict site and enhance the setting for Wolsey Gate. A pop-up garden might be one solution. Removing the temporary wire barriers would be an immediate improvement. There is no evident logic to fencing off the area of wasteland. This type of temporary fencing should be temporary and only allowed for up to 6 months. The pedestrian route along the southern part of Foundation Street already exists but leads nowhere, only to a dual carriageway – routes need to connect places that people want to walk between. If College Street was less dangerous, St Mary at the Quay could use its front door rather than face the car park.</p> <p>viii. Princess Street Bridge gateway – the station needs to be seen as the gateway to Ipswich. Currently, visitors have the choice of walking along ‘dustbin alley’ (Burrell Road) or via ‘shed row’ to the town or waterfront. The front of the station is already fit for purpose and attractive, there is a danger that public art will diminish both its design and its utility.</p>	<p>streets) regarding the position of signs on frontages, the overall size and type of signs, and the preservation of historic fascias.</p> <p>Consistency and appropriateness in the design of paving, street furniture, lighting and street planting is encouraged in several sections of the SPD including Chapter 3: Design Guidance and Appendix 1: Design Approach, Street Types.</p> <p>Careful design of ‘trails’. It is, as the commentator notes, important to avoid redundancy in the design of trails. <u>Additional text added to Supporting Project 40 ‘Discover Ipswich Trails’</u>, referring to the need to consult during trail development, to ensure that popular and durable links are established.</p> <p>Public art. The SPD encourages site specific and relevant artwork that adds to the attractiveness and interest of an area – the Giles statue being a perfect example. More detailed guidance on the subject of public art is beyond the scope of this SPD.</p> <p>(i) St Peter’s Dock. Regarding the point about enhancing waterfront connections on the east side of the town centre, several projects address these areas, including Key Location projects (vi) Upper Orwell St and (vii) Regent Gateway / Majors Corner and Supporting projects nos 20 Fore St Pool area, 21 St Michaels and 32 Christ Church Cox Lane.</p> <p>(11) Bridge St Gateway. It is not currently practicable to redirect traffic from the gyratory,</p>

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	<p>Welcoming signage to parts of the town other than the football ground is more important. Adjusting the traffic lights to prioritise pedestrians and taxis would be an improvement. 14. St Peters Street – a good pace to ban ‘A boards’ on the pavement and provide consistently designed hanging signs. Feature lighting could be helpful and should be magical and twinkling in style 24. River Path – the potential to widen the path and provide lighting would really enhance this asset which is currently under-used as it does not feel safe. 25, 26. Waterfront north and east side – the lighting needs to be maintained rather than replaced by something more contemporary, if they have to be replaced the current twinkly, magical character should be maintained. Extending the lighting and seating along the east side would improve visual coherency encourage people to walk further along the Waterfront, but there is still limited reason to do so – the pedestrian crossing over the dock would have helped, as would the re-opening of the Brewery Tap – as it stands the walk is a dead end. A walking connection along Fore Street, Salthouse Street and Wherry Lane would encourage more use of the East side of the Waterfront and embrace some of the historic gems of the town.</p> <p>32. Tacket Street – ban A frames on the footpath and provide hinging signs – this is one of the worst streets for footpath clutter. 33. Burrell Road link – a really dreadful, ugly but major route from the station to the waterfront. The dustbins on the pavement outside the houses of multiple occupancy are the worst aspect and narrows the pavement to require stepping onto the road at times. The loss of the island crossing from Burrell Road northside to the station leaves pedestrians without a safe, sensible crossing – vehicles have been prioritised over walkers.</p>	<p>because of the consequent impacts upon vehicle circulation throughout the town centre. Its future remains under review, however. Crossing types are under the control of SCC, the Highways Authority. These concerns will be passed on for their consideration.</p> <p>(iii) St Peters Port Area. Pop up garden idea is noted; comment included in text. Regarding the fencing, the land is privately owned and the fencing meets a legitimate security need. The management of the site is, however, subject to monitoring by the Council.</p> <p>(viii) Princess St bridge gateway. The public art proposal is adaptable to a number of locations within the vicinity of the bridge, including on the bridge itself. It will not necessarily be located within the station concourse area where space is indeed quite restricted.</p> <p>(14) St Peters St. A boards on pavements. Planning consent is required for A-boards paced on the pavement. It is only permitted to place them, without consent, on private business forecourts. IBC, as the planning authority, would refuse an application for boards which blocked the highway or caused unnecessary visual clutter. The lighting spec will be given careful consideration in such a prominent area, but the SPD avoids being overly specific in design specification.</p> <p>(24) River path. Comment noted.</p> <p>(25, 26) Waterfront North and East side. Comments noted.</p>

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		<p>(32) Tacket St. A boards on pavements. Planning consent is required for A-boards placed on the pavement. It is only permitted to place them, without consent, on private business forecourts. IBC, as the planning authority, would refuse an application for boards which blocked the highway or caused unnecessary visual clutter.</p> <p>(33) Burrell Road link. Comment noted about the bin storage. Many HMO conversions, for instance within conventional terraced housing are below the threshold (of individuals involved) requiring planning permission. Decisions regarding pedestrian islands are made by the Highways Authority, Suffolk County Council, and the comment will be passed on for their attention.</p>
Theatres Trust	<p>4.2.vii In principle the Trust is supportive of the Council's aspiration to transform the southern end of the theatre car park to create a new public square and entrance space for the Regent Theatre. This would improve the environment around the theatre and enhance the experience of visitors to the theatre. We would just note that any intervention of this nature which reduces the car park area ensures the theatre's needs for get-in/get-out and general servicing requirements are protected. We are also supportive of the re-use or redevelopment of the former Odeon, bringing a prominent site within the town back to active use. We would however caution that should residential use be promoted at this site the design guidance should make clear it must be appropriately soundproofed so as to avoid conflict with the neighbouring theatre. This principle has been included within paragraph 182 of the NPPF (2018).</p> <p>36. In common with our formal response to recent planning applications concerning the public square outside the New Wolsey Theatre, we are supportive of efforts including a new crossing across Civic Drive which would enhance the environment and public realm and improve pedestrian connectivity and permeability to and through the area.</p>	<p>Key Location Project (vii) – Regents Gateway / Majors Corner. Comments noted. Any project affecting the theatre environment would be carried out in close consultation with the theatre management. Residential development of the Odeon site would be subject to normal planning consultation requirements, and this would include neighbouring uses such as the theatre.</p> <p>(36) St Matthews Greenspace. Comments noted.</p>

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Sports England	<p>Sport England is supportive of this document because it seeks to enhance the public realm in Ipswich Town Centre, making it more attractive for people to engage in informal activity such as walking and cycling.</p> <p>Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments/master plans incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link: http://www.sportengland.org/activedesign</p>	Comments noted.
Suffolk Constabulary Southern Area Policing Command	<p>Comments in relation to the general strategy outlined in sections 1-3:</p> <p><u>Seating</u></p> <p>Whilst seating can be beneficial to the town, it can also encourage congregations of people whose behaviour then impacts negatively onto neighbouring properties, residents and businesses. In order to mitigate this risk;</p> <ul style="list-style-type: none"> · seating should only be located in areas where there is high passing footfall and good natural surveillance. This includes in places such as churchyards. · Seating should not be located against a wall or building to ensure maximum surveillance and prevent the seating being used as a climbing aid to gain access to private areas. · Seating must be designed to prevent people from sleeping or cycling/skateboarding on it (for example with arm rests along a bench or seats that are a curved shape). · Seating should be designed such that packages cannot be concealed on or under them. <p><u>Public Parks</u></p> <p>Ipswich has several large and established parks which are well used by members of the community and an asset to the town. However, they have increasingly become hotspots for drug related activity. There is a fine balance to be struck between providing a relaxing natural</p>	<p>Seating. Comments noted. It may be necessary to seek compromise in some instances, but the points raised are also good general design practice. <u>Comments incorporated into Section 3, 'Design for Security'</u></p> <p>Public Parks. The SPD does not include any of the larger public parks, although it does include smaller areas such as churchyards, where these recommendations could apply. <u>Comments incorporated into Section 3, 'Design for Security'</u></p>

Respondent	Comment	IBC response
	<p>environment and deterring this sort of activity but where possible;</p> <ul style="list-style-type: none"> · natural surveillance should be encouraged by keeping vegetation cut back. · Consideration should be given to the provision of toilet facilities in the park. Maximising natural surveillance around the toilet blocks, reducing the opening hours and carrying out regular checks on the toilet may assist in deterring criminal activity. Redevelopment of the blocks to create individual cubicles opening directly onto the street should also be considered. <p><u>Cycle storage</u> Cycle crime is high in the town centre and the fear of having a bike stolen will deter some people from bringing their bikes into town. In many cases, cycles locks are cut or forced in order to steal the bikes. In order to mitigate the risk of thefts:</p> <ul style="list-style-type: none"> · Consider a scheme whereby Sold Secure Gold standard D locks could be loaned for a returnable deposit from public buildings with cycle storage nearby (i.e. libraries, sports facilities etc). Ideally these locks would be used in addition to the owners lock. · Ensure cycle facilities are covered by monitored CCTV. <p><u>Lighting</u> Good lighting can enhance both natural and formal surveillance. However, care must be taken to avoid illuminating areas that are not subject to regular surveillance as this may encourage congregations of people behaving in a negative manner.</p> <p><u>CCTV</u> CCTV coverage is often negatively impacted upon by tree coverage, especially when the trees are in leaf. Planting and pruning strategies must take this into account.</p> <p><u>Embedding technology</u> Providing public charging points and free Wi-Fi can also encourage negative congregations of people. Any such facility should be within an area subject to close surveillance and have the facility to be disabled quickly as required.</p> <p><u>Bus shelters</u> Bus shelters should be located in places of good natural surveillance and not against walls to encourage natural surveillance.</p> <p><u>Waste bins</u> Waste bins should be constructed of transparent material to reduce the risk of suspect packages being left in them and to</p>	<p>Cycle storage. Comments noted.</p> <p>Lighting. Comments noted. Lighting schemes will be planned with security as well as aesthetic considerations in mind. Do not agree with comment that unsupervised areas should also be poorly lit – this creates a security hazard.</p> <p>CCTV. A balance will need to be struck between the need to create pleasant environments and to provide adequate security surveillance. <u>Comments incorporated into Section 3, 'Design for Security'</u></p> <p>Embedding technology. Comments noted.</p> <p>Bus shelters. Guidance on bus shelter location is provided in Design Guidance section, page 72. It recommends clear space behind bus stops.</p> <p>Waste bins. Comments noted, but do not agree that the contents should be visible – not aesthetically desirable and</p>

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	<p>maximise the opportunity for detection if this is the case.</p> <p><u>Bollards</u> Care should be taken to ensure that bollards or other street furniture to deter traffic should be designed to avoid being possible to sit upon, especially in areas not subject to good surveillance.</p> <p><u>Key Location Projects</u> The generic points made above should be applied to each of the key location projects and the DOCO consulted when more detailed plans are known. However, please see below some comments in response to the details provided thus far:</p> <p>i. St Peter's Dock</p> <ul style="list-style-type: none"> · Planters/bollards or similar street furniture should be installed to provide protection to users of quayside café facilities from vehicles sharing the space. · Ensure that narrow passageways between buildings are subject to good quality monitored CCTV. · Investigate methods of collecting waste from the water to avoid the 'broken window' effect whereby more rubbish and crime is generated. · Ensure that any new boardwalks are inaccessible from underneath to deter rough sleeping or drug related activity. <p>ii. Bridge Street gateway</p> <ul style="list-style-type: none"> · Ensure that any tree planting in front of the church does not obscure natural or formal surveillance. <p>iii. St Peter's Port area</p> <ul style="list-style-type: none"> · Ensure that planting does not obscure natural surveillance from the road. · Ensure that any seating is subject to good natural surveillance. · If a play space is proposed, build in the option to make it secure in the evenings if required and avoid installing any equipment that could be used to conceal drugs or weapons. · If the rear of the church yard is to be opened up, ensure that this will not allow access into secluded areas within the church yard that had previously been secure. <p>iv. Westgate/Tavern/Carr streets</p> <ul style="list-style-type: none"> · Install barriers to deter vehicular access out of agreed times (ie at Majors Corner and also from Northgate St). · Ensure that street furniture (ie benches, planters etc) provide protection for pedestrians when vehicular access is required. <p>v. Upper Brook St/Northgate</p>	<p>some semi transparent materials, eg perforated steel, are less resistant to vandalism.</p> <p>Bollards. Comments noted. The existing recommendation on page 68 (Design Guidance section) is for as few bollards as possible, using more informal elements to create separation.</p> <p>(i) St Peters Dock. Disagree that this comment should be added as suggested. Use of street furniture to provide informal separation can be considered, although it is also possible to create separation through, eg shallow kerbs, as on the existing waterfront.</p> <p>CCTV. Disagree that this should be identified as a distinct point; the design proposals are general in character and a CCTV coverage assessment will be part of a detailed design approach.</p> <p>Collection of rubbish from water. Comment noted. <u>Comment added to Key Location Project (i)</u></p> <p>Boardwalk security. Specialised security point – too detailed for SPD.</p> <p>(ii) Bridge Street Gateway. Points noted. Tree management in churchyards is a specialist area associated with the environmental and heritage value of the tree specimens. Security issues will be assessed as part of these considerations.</p> <p>(iii) St Peters Port. Points about ensuring adequate surveillance are noted, but the individual</p>

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	<ul style="list-style-type: none"> · Ensure that there is clear physical demarcation between the pedestrian areas and those intended for vehicles and cycles. For example, if the loading and disabled bays are to be raised to footway level, ensure that there is a barrier to prevent the pavements being driven or parked upon. vi. Upper Orwell Street streetscape <ul style="list-style-type: none"> · Redevelopment of the public realm area adjacent to St Michael's church is welcomed. Steps should be taken to prevent access to the neighbouring flats unless there is right of access. Access into the private car park behind this land must also be restricted. Consideration to be given to selling this land for private development. vii. Regent Gateway/Major's Corner <ul style="list-style-type: none"> · As per the generic points — paying particular attention to the importance of not obscuring CCTV with new or existing trees. · Consider totally redeveloping the toilet block to consist of individual cubicles accessing directly onto the street to deter drug use in the cubicles. viii. Princes Street Bridge gateway <ul style="list-style-type: none"> · Ensure that there is no access under the bridge from the station side to deter rough sleepers/drug related activity. ix. Arras Square/St Stephens <ul style="list-style-type: none"> · This is currently a priority area for police due to the volume of incidents relating to ASB and issues relating to the street community. · The proposed development is broadly welcomed, in particular the thinning of the trees and repairs to the paved areas. Where possible, surfaces should be level or sloped and steps avoided. Any benches in this area must be close to areas of high footfall and formal surveillance. · It is also suggested that the audio function is enabled on the existing CCTV to allow IBC staff to converse with anyone acting inappropriately in this area. · Consideration may also be given to installing convex mirrors at the rear of Wilkinsons in order to increase natural surveillance over the area. · The owners of the service yard should be encouraged to remove/reduce the height of the dividing wall to increase natural and formal surveillance along St Stephen's Lane. A barrier such as welded mesh could still be used to create a boundary if required. 	<p>points raised are too detailed to be inserted into the SPD.</p> <p>iv) Westgate. Comments noted.</p> <p>v) Upper Brook St / Northgate St. Disagree with recommendation for insertion of additional barriers within an already restricted pavement space, unless essential. Also, disagree with proposal to demarcate cycle areas; segregating uses leads to higher speed cycling.</p> <p>(vi) Upper Orwell streetscape. Comments noted. New designs will seek to eliminate redundant space.</p> <p>(vii) Regent Gateway/Major's Corner. Comments noted</p> <p>(viii) Princes St bridge Gateway. Comments noted.</p> <p>(ix) Arras Square/St Stephens. Comments noted. CCTV audio function is a valid point, but too security-specific for the SPD. Disagree with the installation of convex mirrors; a traffic-management measure not appropriate in a pedestrian area. Disagree with the proposed lowering of the wall on the south side of the churchyard, which currently helps screen the unsightly service yard from the main pedestrian area. Removal of recessed doorways could be considered in unlisted buildings, but this is a specific security measure not appropriate to a public realm SPD. Metal railings to churchyard. Security fencing of any kind would not be appropriate in a listed building setting, but a more designed approach to separation between paving and</p>

Respondent	Comment	IBC response
	<ul style="list-style-type: none"> · The recessed doors along St Stephen's church lane should be brought forward to deter congregation and rough sleeping. · Monitored CCTV must be installed along St Stephens Church Lane. · Consideration should be given to erecting metal railings along the outer edge of the retaining wall of the graveyard area. Gates could be opened to allow families and members of the public access during the summer but secured at night or times when there may otherwise be anti-social congregation in this area. · Relocate the cycle parking area so that it is to the left of the rear entrance of BHS where it will be subject to better natural surveillance. <p>x. St Lawrence Church area</p> <ul style="list-style-type: none"> · Include CCTV coverage of this area. · Consider enclosing this area so that it can safely be used by customers of the cafes adjoining the area, but is not a cut through/escape route into a secluded area. Gates that were closed but not locked would assist this and deter (drug related) ASB being displaced from nearby locations where partnership work is currently underway to prevent it. <p>xi. Tower Street and Tower Ramparts East.</p> <ul style="list-style-type: none"> · Ensure that any consolidated area for commercial bins in Tower St is enclosed and accessible only to the owners and waste collectors to avoid rough sleeping/drug activity. · Seating should only be provided in areas subject to high footfall and surveillance. · Consider if public access around Oak Lane and Hatton Court are necessary 24/7 as this is an area that attracts a high volume of drug related activity and other criminal behaviour. · Consider the use of cycle lockers in this area instead of simple racks. <p>xii. Lloyds Avenue</p> <ul style="list-style-type: none"> · Shared surface streets are not encouraged in this area. This would mean no protection for pedestrians using the area. As this is a long stretch of road which then leads into the main Corn Exchange area, the risk from hostile vehicles could not be ruled out. <p>It is understood that funding is limited and therefore the level of work that can be achieved is limited. Therefore specific comments have not been made on the 'Other Supporting Projects'</p>	<p>churchyard might be considered. <u>Comment added to Key Location project (ix)</u> Cycle parking point noted.</p> <p>(x) St Lawrence Church area. Creating partial enclosure / more controlled access to the area could be considered. <u>Comment added to Key Location Project (x)</u></p> <p>(xi) Tower Street and Tower Ramparts East. Bin and seating comments noted</p> <p>Restricted access to Oak lane – Comment noted</p> <p>Cycle lockers – Comment noted</p> <p>(xii) Lloyds Avenue. Disagree with comment about avoiding shared surfacing in this area. The street environment can be managed with informal barriers such as tree planting, seating etc, to restrict vehicle access.</p>

Respondent	Comment	IBC response
Ipswich Central	<p>1.3 - the rationale for the strategy is set out as (a) helping to boost confidence and image, and (b) acting as a catalyst for further development and investment. Our view is the driving force must be (b) rather than simply (a).</p> <p>1.6 – we recommend that a key theme for any investment must be that it is consistent with the agreed Vision for Ipswich, which is to develop ‘East Anglia’s Waterfront Town Centre’. Partners to the Vision (including ourselves and Ipswich Borough Council) agree that the priority is to ‘turn the town around’ such that its historic east-west trajectory is replaced by a north-south axis, better linking the retail and commercial core with the Waterfront. Investment in the public realm needs to be consistent with this priority. Additionally, the unique selling points for any place should further inform both its Vision and any resultant investment strategy – in our view, this should prioritise Ipswich’s dominant role as a ‘cultural capital’ alongside the ambition to be East Anglia’s Waterfront Town Centre, and cultural assets should be preserved and enhanced as points of distinction.</p> <p>1.8 – here, the north-south axis is mentioned, but alongside the ambition to “improve [the] Carr-Tavern-Westgate route”. Given the crisis in the retail sector, it is unrealistic to expect large swathes of this former ‘golden mile’ to ever be returned to gainful commercial activity, and alternative uses (yet to be delivered) will need to be agreed. At this stage, we would strongly resist public investment in anything other than the current retail core (Cornhill and extensions; Buttermarket and surround) which are the areas around which renewed “development and investment” will most likely support such spend.</p> <p>3.5 – we have some concerns here that design guidance will reflect current uses of the space. Town centres are changing fast and future uses must be anticipated in line with the Ipswich Vision. Often, more ambitious treatments are better suited to stimulating “development and investment” rather than more anonymous outcomes.</p> <p>Street furniture – we agree with the proposal to remove all unnecessary street “clutter” and would suggest an audit is undertaken of the whole town centre (including work undertaken) prior to any major public realm commencing as this would, on its own, benefit many areas.</p>	<p>1.3. These are interdependent objectives; the SPD addresses the need to improve the town’s image and also to focus investment in areas most likely to produce economic benefits.</p> <p>1.6. Although not a primary source for the design strategy, the Ipswich Vision of improved north-south connectivity is expressed through the objective of improving connectivity between key places, and the significant number of Key Location Projects and Supporting Projects which coincide with the identified town / waterfront routes – see map on page 79.</p> <p>Cultural assets are given prominence in the Strategy through the Objectives (1.9) of strengthening identity, celebrating public life, prioritising walking, enhancing legibility. Many projects are designed specifically to enhance the public realm settings of historic buildings and important public uses such as the museum on the High St.</p> <p>1.8. The focus of public realm investment will remain subject to review. The number and coverage of projects ensures that choices are available to meet the evolving requirements of the town centre, for instance in response to the contraction of the traditional retail core.</p> <p>3.5. The recommendation to analyse existing uses is a starting point for design, not an end point. It follows good practice to establish existing patterns of use, as it draws attention to weaknesses as well as strengths. Once identified, a design decision could be to change a pattern of use rather than retain or enhance it.</p> <p><u>Proposed street audit – comment added to 3.7 Street Furniture Strategy</u></p>

Respondent	Comment	IBC response
	<p>3.8/3.10 – we recommend far more ambitious seating designs than those illustrated.</p> <p>3.11 – wherever possible, and beneficial, we would like to see surfacing treatments that become an attraction in themselves through innovative, rather than conventional, design solutions.</p> <p>3.12 – wherever possible a ‘tree-lined boulevard’ approach should be adopted (e.g. Museum Street, Lloyds Avenue etc.).</p> <p>3.13 – in a similar way to the surfacing treatment, we would advocate creative use of lighting, not just to illuminate buildings and spaces, but to enliven them such that they become an attraction in their own right.</p> <p>3.14 – we would like to see damaged wayfinding signage repaired and maintained. It should also have improved digital connectivity.</p> <p>4.2 – in outlining our priority projects, we return to our main point made in response to 1.3 and 1.8, which, combined, lead us to strongly recommend that proposed schemes are prioritised according to (a) their contribution to improving north-south linkages, and (b) their acting as a catalyst for further development and investment. We are also mindful that work to St Peter’s Dock (i) is underway, funded by a Coastal Communities grant.</p> <p>Further comments received following on from the (4 projects) Public Spaces consultation. These set out Ipswich Central priority of projects provided - in no particular order are: viii – Princes Street Bridge ix – Arras Square xii – Lloyds Avenue</p>	<p>3.8/3.10. Seating choices, along with other street furniture selection, will be undertaken according to the conditions of the space and the requirements of the design. Bespoke seating design of the type installed in the Cornhill recently is not excluded from the SPD.</p> <p>3.11. Dependent upon location, highly distinctive paving design will always be a consideration – the green granite setts in the Cornhill, for instance. Practical considerations will always be relevant, however, such as the funds available for maintenance, the availability of replacement paving in the future, the involvement of the highways authority, and the need to bear loads in trafficked areas.</p> <p>3.12. Ipswich town centre has narrow medieval streets which do not lend themselves readily to street tree planting. There is more potential for Individual or group trees in squares or churchyards.</p> <p>3.13. There are a number of examples of recommendations involving the creative use of light sources. See, for example, Key location projects (iii), (vii), (viii), (x)</p>
JTS Partnership	<p>Cardinal Lofts (Mill) Ltd owns the freehold interest in a number of sites located towards the western end of the Waterfront / Wet Dock area. These representations, made in respect of the Town Centre and Waterfront — Public Realm Strategy SPD should be read in conjunction with the related representations that are to be made, by the Company, in respect of Ipswich Local Plan Review. <u>Introduction</u>. The Company welcomes, and supports, both the objectives (para 1.6) and themes (para 1.9), as set out in this section. The Company does, however, suggest that an</p>	<p>Para 1.9 ‘Achieving the Objectives’. The SPD sets out in para 1.3 the benefits of urban renewal; ‘bringing higher footfall and more commercial activity. Tangible, physical improvements will help boost confidence and image, and help catalyse further development and investment, underpinning long term resilience and competitiveness of Ipswich’.</p>

Respondent	Comment	IBC response
	<p>additional theme should be included within the text, which commits the Borough Council to promoting, and enhancing, the viability of development in the Town Centre and Waterfront area. Enhancements to the Public Realm can act as a catalyst to further investment in the area and the development of the many derelict, and empty, sites that detract from the town's character. 3. Design Guidance. The Company offers its general support to the design guidance for streets and public spaces as set out this section of the document.</p> <p>4. Identified Projects iii. St Peters Port area. The Company looks forward to working with the Borough Council to bring forward the development of the St Peter's Port site, in a manner which properly respects the sensitivity, and heritage interest, of Wolsey Gate, St Peter's and St Mary at the Quay churches, together with the listed building at No's 1 to 5 College Street. Whilst the Company's emerging proposals include the enhancement of the north / south route between St Peter's Street and the Waterfront, it considers that it may be over ambitious to try and, effectively, provide three new pedestrian routes through the site (Turret Lane — Foundry Lane: St Peter's Port to DanceEast Square: Fountain Street to DanceEast Square).</p> <p>Three routes through the site, when taken together with the proposals to improve the setting of, and the focal points around, St Peter's Church and Foundation Street / St Mary at the Quay, could considerably restrict the amount of development that could be achieved on the site (so threatening its viability). It would also create multiple crossing points, in close proximity of each other, on College Street, which could potentially be unsafe in advance of any firm proposals to realign the Star Lane gyratory system.</p> <p>The Company is also concerned about the potential impact, upon the viability of the site, of the proposals to provide new areas of green space - adjacent to St Peter's Church, Wolsey Gate and along the Star Lane boundary. Further information about the viability of developing the site is set out in the representations submitted in respect of the Site Allocations and Policies Development Plan Document Review.</p>	<p>The SPD is a design rather than an economic development document, but it embodies the ambition of enhanced economic performance. It is not, therefore, necessary to restate this within the 9 'themes', which are concerned with design approaches.</p> <p>Key Location Project (iii) St Peters Port. Comments about through routes and green space noted. The recommendations refer to the potential within a site, which it may not be possible to fully realise, due to site constraints at the development stage, however the objective of open space creation and north-south connectivity can be achieved in other ways. The Turret Lane alignment is of great historic significance; retaining the potential for a route should remain in the SPD.</p>

Respondent	Comment	IBC response
	<p>5. Identified Projects: 17. The Company supports the Council's proposals to make better use of this important public space.</p> <p>4. Identified Projects 18. Foundation Street South. The Company generally supports the proposals for Foundation Street. They must, however, recognise the fact that Foundation Street will, most likely, provide the main vehicle entrance for any future development of the St Peter's Port site.</p>	<p>Supporting Projects (17) DanceEast Square. Comments noted.</p> <p>Supporting project (18). Foundation Street south. Comment noted, but the emphasis in the SPD will remain. A solution will need to be found which protects the proposed pedestrian space in front of St Marys Church – it is a potential asset for the redevelopment of St Peters Port as well.</p>
Natural England	<p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p><u>Green Infrastructure</u> This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure;'. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> · green roof systems and roof gardens; 	<p>In response to comments about green habitat networks, green infrastructure and biodiversity enhancement, it is agreed that this information is absent from the SPD, and should be included, for instance in relation to the river corridor other green areas such as churchyards.</p> <p><u>Biodiversity and green infrastructure paragraph added to 3.12.</u></p>

Respondent	Comment	IBC response
	<p>· green walls to provide insulation or shading and cooling;</p> <p>· new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).</p> <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is include within The Town and Country Planning Association's ""Design Guide for Sustainable Communities"" and their more recent ""Good Practice Guidance for Green Infrastructure and Biodiversity"".</p> <p><u>Biodiversity enhancement</u></p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p><u>Landscape enhancement</u></p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p><u>Other design considerations</u></p> <p>The NPPF includes a number of design principles which could be considered, including</p>	

Respondent	Comment	IBC response
	the impacts of lighting on landscape and biodiversity (para 180).	
Historic England	<p>We are pleased, to have the opportunity to comment on this document at this stage. These comments should be read in conjunction with our previous consultation response, submitted on 26 July 2017. Paragraph 185 of the National Planning Policy Framework (NPPF), is relevant.</p> <p><u>General Comments</u></p> <p>We welcome the timely production of this SPD, and are pleased to see that the historic environment of Ipswich is at the forefront of considerations in this strategy, with its rich heritage highlighted in the first paragraph of the document. Moreover we appreciate the sentiment it espouses of ‘making the town a more beautiful place’. We would suggest that the word ‘heritage’ could be replaced with ‘historic’, for a more formal use of language.</p> <p>Para 1.5 - there is a minor typo in this paragraph: “three key objectives”.</p> <p>We support the three key objectives identified in para 1.6, and are pleased to see that one of the key outcomes of achieving those objectives is intended to be a celebration of Ipswich’s heritage. We would suggest, however, that the enhancement of Ipswich’s historic townscape could be included as a key objective in itself, which could be achieved through the successful implementation of positive changes to the public realm, improvements to permeability and legibility etc.</p> <p>We welcome the identification in paragraph 1.8 of ‘celebrating Ipswich’s heritage’ as a key beneficial outcome from achieving the document’s three objectives. We also welcome the intended outcome of strengthening north-south axes across the town to the waterfront. Achieving this outcome would, if implemented appropriately, also reinforce the historic character and urban morphology of this most historic section of Ipswich.</p> <p><u>Para 1.9 - themes</u></p> <p>Many of the themes identified will undoubtedly have tangential benefits for the historic environment, and we are pleased to see the inclusion of improvements to public spaces such as church yards, as well as the public realm in the town centre, included. Given the stated intention of ‘identifying the good “things about Ipswich’, we would welcome further emphasis on the potential for improvements to the historic character of Ipswich within these</p>	<p>1.5. Typo noted. <u>Corrected.</u></p> <p>1.6. Comment noted. The conservation of Ipswich’s unique historic townscape is an important objective. <u>In response to HE’s comment, the third objective has been amended to reflect conservation concerns.</u></p> <p>1.9. Themes – in response to <u>HE’s comment, the historic references in the ‘Strengthening Identity’ theme have been enhanced, and the word ‘incidental’ removed from the second theme ‘celebrating public life’</u></p>

Respondent	Comment	IBC response
	<p>themes, perhaps as additional text within ‘Strengthening Identity’, given that Ipswich’s identity is inextricably linked with the town’s historic environment.</p> <p><u>Policy Context</u> In addition to the legislation already referenced, we suggest that the statutory duties placed upon Local Planning Authorities in Sections 71 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 should also be referred to, in support of the proposals. In addition, we would highlight that the NPPF has recently been updated (February 2019). We would suggest that there are various sections within the NPPF that it would be worth highlighting, particularly those found in the sections on design and conserving the historic environment.</p> <p><u>Design Guidance</u> We welcome the comprehensive guidance found in this section regarding the principals of good urban design and we are pleased to see that the best practice found in Historic England’s advice ‘Streets for All’ is evident throughout. In particular, we welcome the emphasis on reducing street clutter, minimal signage, and local distinctiveness on pages 8 and 9. We would recommend that, in the section on surfacing materials on page 12, consideration is given to ensuring that where high quality materials are installed they are not subsequently removed and not replaced during excavations for utilities maintenance etc, undermining the benefits.</p> <p><u>Focus Projects</u> In general, Historic England welcome these projects, and consider that overall their implementation will result in a positive change to the historic townscape of Ipswich, particularly where programmes of new public realm, decluttering and improved lighting and signage will create new spaces and routes through the historic townscape of Ipswich enhancing the setting of listed buildings and better revealing the significance of the conservation area. As a general comment, we consider that the language within the packages could be more definitive in places, providing more certainty about what the council expect to see in certain locations, rather than simply providing suggestions as to what ‘could be done’. We do not wish to make detailed comments on each of the proposed projects, but offer the</p>	<p><u>Policy Context. Comment noted about inclusion of Planning (Listed Buildings and Conservation Areas) Act 1990, and sections from the NPPF. Additional paragraph (2.6) added to reflect comment.</u></p> <p><u>NPPF – Policy Context paragraph no. 2.7 added referencing the heritage aspects of the NPPF.</u></p> <p>Page 12 – surfacing. This issue is addressed in Appendix 2 – Maintenance & Management.</p> <p>Focus projects. The SPD avoids design masterplanning in order to retain flexibility, given the medium / long time period for which guidance is being provided.</p>

Respondent	Comment	IBC response
	<p>following specific comments and queries on certain key projects.</p> <p>Project i - St Peter's Dock We welcome this project, and consider that it will represent an enhancement. Specifically, we're pleased to see that consideration is given to the unification of the public space with areas further east through the use of a coherent palette of materials. We are also pleased to see that the area's maritime heritage will provide an underpinning theme for works along the water's edge, which will help reinforce a 'Waterfront' identity and potentially enhance the conservation area. "</p> <p>"Project ii - Bridge Street gateway We concur that this is an important arrival area for both the Waterfront and Town Centre parts of Ipswich, and that the proposed redesign will result in some benefits in terms of north-south connectivity, the area around St Peter's Dock, and the increased area of open, landscaped space would be an enhancement to the setting of St Peter's Church. However, we consider that the project will only provide relatively superficial benefits to this area whilst the gyratory remains. In particular, we would question the use of a public seating area that faces out onto the busy two lane highway approaching the roundabout. We consider that the brief statement regarding the Star Lane Gyratory is limited in ambition, and the second sentence, moreover, appears to be incomplete. Please see below for additional comments regarding this point.</p> <p>Project iii - St Peter's Port Area We welcome the intention to sensitively redevelop the site to the east of St Peters, and are pleased to note that the setting of both the church and the Wolsey Gate is referenced. We would welcome early discussions with relevant stakeholders regarding detailed design proposals for this area, given the sensitivity of this location.</p> <p>Project v - Upper Brook Street/Northgate We welcome the general principles of this project, but suggest an additional aspiration could be to reduce the carriageway width, in order to provide a better environment for pedestrians using the shops and other amenities along the street. The possibility for street trees in this location could also be explored, if thought appropriate.</p> <p>Project vi - Upper Orwell Street</p>	<p>Project (i) St Peters Dock. Comments noted.</p> <p>Project (ii) Bridge Street Gateway & Project (iii) St Peters Port Area. Comments noted. The provision of pedestrian spaces alongside the junction will be managed through closure of the sliproad, which will create space for an environmental screen.</p> <p>IBC and SCC understand the negative impact of the gyratory, and continue to work together to find a long term solution which will enhance the waterfront setting and improve north south pedestrian connectivity, whilst allowing for efficient vehicle movement east-west through the town centre.</p> <p>(v) Upper Brook St / Northgate. Comment noted. The street is part of the bus circulation route and traffic management currently precludes pavement widening.</p> <p>(vi) Upper Orwell St. Comment noted – <u>reference to high quality and distinctive added to SPD.</u></p>

Respondent	Comment	IBC response
	<p>In the second bullet point it is unclear what 'special materials' might be, and suggest that the words 'high quality and locally distinctive' are substituted.</p> <p>Project viii - Princes Street Bridge We welcome this project, and consider that the unification of public realm, signage and lighting (including the reinstatement of authentic nineteenth century lamps on the bridge itself) will enhance the route between station and town.</p> <p>Project ix - Arras Square Improved and consistent public realm around the church of St Stephens is welcomed, subject to design details, as it will create a sense of unity and coherence to this area. We are pleased also to note the intention of making reference to the site's Anglo-Saxon origins in the design for new public realm, and consider that this has the potential for better revealing the area's significance. "The 'viewpoint' indicator for the map on this project appears to be incorrectly located.</p> <p>Supporting Projects We suggest that for clarity a small map of each of the numbered Supporting Projects could be included to help orientate the reader. Otherwise, we welcome the general principles that underpin these supporting projects, but do not wish to offer detailed comments for each one. In particular, however, we consider the proposed Ipswich Trails (40) to be a positive idea and project that will enhance the way people are able to engage with and appreciate Ipswich's historic environment.</p> <p>The Star Lane Gyratory We note that the gyratory is briefly mentioned on page 28, but this comment appears vague and non-committal regarding what should be one of the key considerations of any public realm strategy that focuses on the integrity of Ipswich's historic core and the linkages between the town centre and the waterfront. We appreciate that the gyratory represents a long term issue, and that solving the problems of connectivity it creates will require a long term plan. However, we consider that this SPD lacks the firm commitment to addressing the issue we would like to see from a strategic document. We consider that not fully addressing the question of the Star Lane Gyratory at this stage would be a fundamentally missed opportunity for Ipswich, and undermines the document's ability to achieve its key objectives - i.e.</p>	<p>(viii) Princes St Bridge. Comment noted. The options for bridge parapet lighting may include modern as well as traditional designs, but this will be dependent on the approach developed.</p> <p>(ix) Arras Square. Comments noted. <u>Correct viewpoint on inset map.</u></p> <p>Supporting Projects. Inset maps will not be necessary, but it may be possible to repeat the orientation map on page 25, at the start of the Supporting Projects section.</p> <p>Star Lane Gyratory. Comments noted. See IBC's response in relation to project (ii), above. The gyratory is subject to continuing review, but IBC do not share HE's view that a comprehensive reappraisal of its future, with implications for traffic movement throughout the town centre, is a priority.</p> <p>SCC have been party to the production of this document and have not sought the inclusion of significant changes to the gyratory system. Ultimately the SPD seeks to improve public spaces, and the environmental improvement of</p>

Respondent	Comment	IBC response
	<p>enhancing connectivity, permeability, legibility and coherence - in the long term.</p> <p>The problems the gyratory causes, including inhibiting connectivity between the town centre and waterfront for active modes of transport; a lack of townscape coherence; the degradation of the setting of listed buildings and the character of both Waterfront and Town Centre conservation areas; and indeed other environmental effects such as air pollution, are commonly discussed. Although, as noted above, many of the individual packages of works - particularly those in and around the area of the gyratory - would result in improvements, the overall benefits of the improvements in the area affected by the gyratory will be limited and consequently Ipswich will likely not achieve its full potential until the overarching issue of the gyratory is addressed.</p> <p>This SPD has the potential to set the agenda for the long term improvement and enhancement of Ipswich's internal connectivity, and it is the ideal document to begin to set out some broad strategic intentions with regard to the gyratory that can be subjected to public consultation at an early stage. Ideally this document should be underpinned by a thorough, detailed and objective analysis of the gyratory and its impact on movement through Ipswich, using this as an evidence base to support the SPDs discussion and recommendations. However, we recognise that unless this work has already been commissioned and carried out, this would result in a delay to the SPDs adoption that may not be desirable and therefore in lieu of this, we strongly recommend that a more proactive, ambitious approach is taken. Specifically, we would recommend that this SPD actively commits the local authority to commissioning a detailed study into the gyratory and possible approaches to its future management as one of its key recommendations.</p> <p>"We would highlight also that there is presently a renewed focus by Government on potentially large scale and strategic improvements to our town and city centres, including for instance the Future High Streets Fund: The Housing, Communities and Local Government Committee has also very recently published its research on High Streets and town centres.</p> <p>Appendix 2 - Maintenance</p>	<p>the gyratory is sought through a number of the projects, including identifying the improvement of connectivity between important spaces across the SPD area. Any significant change to traffic flows, as identified by HE, is beyond the scope of the document. Officers will continue to work with SCC as the Highways Authority with regards to any proposed changes to the highway.</p>

Respondent	Comment	IBC response
	<p>We welcome the consideration given to ensuring continuity of supply for bespoke materials and their storage (p84). We also welcome the consideration given under 'Reinstatement', on page 85, to ensuring that high quality and non-standard materials are replaced on a like-for-like basis after interventions, for example by utility companies.</p> <p><u>Concluding Comments</u></p> <p>In conclusion, we welcome the production of this SPD and consider that the principles and projects that it proposes to implement are positive and will, overall, result in enhancements to Ipswich's historic town centre over the medium to long term.</p>	<p>Concluding Comments. Noted.</p>
<p>Savills on behalf of ABP</p>	<p>The SPD area covers the town centre and includes the Wet Dock and Island site, which comprise parts of ABP's land ownership. As IBC is aware, the Island Site is allocated for comprehensive development as Site IP037.</p> <p>ABP is supportive of the general aims of the three projects which are relevant to its landholding at the Island Site and in the surrounding area, namely:</p> <ul style="list-style-type: none"> i. St Peter's Dock (a 'Key Location Project') 25. Waterfront – North Side (an 'other supporting project') 40. Discover Ipswich Trails – Maritime Heritage (a 'potential future link') <p>However, where IBC seek contributions towards the realisation of these projects through CIL and s106 obligations, such contributions should be reasonable and proportionate to the development proposed and should not jeopardise the commercial viability of the scheme being promoted (consistent with Policy CS17 - see particularly paragraph 8.199 - of the adopted Local Plan). This is particularly critical in respect of the Island Site given the existing constraints of the site and the recognised need for the redevelopment of the site to address these constraints in a economically viable and deliverable manner.</p> <p>In particular, we note the reference in respect of Project i. St. Peter's Dock to the "potential to create wooden boardwalk over water between Albion Quay and New Cut East, potentially stepping down to water level from the road" and "In long term investigate the feasibility of a new pedestrian and cycle bridge between Foundry Lane and Whip Street which reinstates this historic connection". The impact of construction over the navigable waters of the Wet Dock and</p>	<p>Officers are glad that ABP as a main landowner are supportive of this SPD. Where financial contributions are sought they will need to pass the tests as set out in the Community Infrastructure Levy Regulations 2010, in that they must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.</p> <p>The governments NPPF sets out that individual site viability will be assessed at the time of actual applications. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p> <p>The projects identified within the Public Realm Strategy SPD identify where potential for improvements to public space can be made. The deliverability of the projects themselves, are subject to feasibility and landowner/stakeholder involvement. Where development is forthcoming as part of wider regeneration projects such as the Island Site, or in isolation, the respective</p>

Respondent	Comment	IBC response
	<p>a crossing of the New Cut are matters which ABP will need to scrutinise carefully and would expect to be involved in respect of its statutory duties as a harbour undertaker.</p>	<p>statutory consultees will be consulted at the appropriate time.</p>
<p>SCC Senior Archaeology Officer</p>	<p>The potential is exciting, especially for archaeology/heritage elements but also more generally as a resident. There might be a need to mitigate tree pit holes in some places. The following sites would benefit from discussion of/mitigation for planting where deeper areas may be proposed, as areas of archaeological sensitivity – although a note in 3.12 that archaeology should also be considered when schemes are developed might cover them all? ii) Bridge St Gateway, vii) Regent gateway/Major's Corner, xi) St Mary le Tower, 15) Cromwell Square, 21) St Michael's Church, 22) St Margaret's Green, 36) St Matthew's Churchyard, 37) St Mary at the Elms.</p>	<p>Comment noted. <u>As suggested, a 'Consider Archaeology' subheading within 3.12 'Urban Planting', provides a single comment covering all sites. Ref to archaeology SPD also inserted in Policy section.</u></p>