

Appendix D

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## Scoping Report Comments

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
1	Katie	Norton	NHS England - East Anglia Local Area Team	General comment	While there are no specific comments at this time, indeed the document looks extremely comprehensive, it is clearly essential that the health implications of any future plans and developments are considered fully. The Health and Wellbeing board will have a key role in the on-going work and we would anticipate being able to offer our support and input through this forum.	Health implications are fully considered through the assessment of policies and site allocations against the SA objective <i>HW1 To improve the health of those most in need.</i>
2	Sue	Bull	Anglian Water	3.3.13 Themes and issues	Agree with main themes and issues identified (3.3.13) in particular: 1) the need to promote and protect the water environment including issues such as quality and resource use 2) the need to adapt to the threat posed by climate change	N/A
			Anglian Water	3.4.2 Issues and Opportunities	We believe the key sustainability issues relevant to Anglian Water have been identified in table 3-2 under the water and climatic factors topics.	N/A
			Anglian Water	5.5.2 Issues and Opportunities	We believe the key sustainability issues relevant to Anglian Water have been identified in table 5-2 under the water and climatic factors topics.	N/A
3	Janet	Nuttall	Natural England	General comment	Natural England promotes the use of our guidance document 'Environmental Quality in Spatial Planning', produced jointly with the Environment Agency and English Heritage, and would recommend that reference is made to this document during the preparation of the new local plan. In particular, Supplementary File 14 provides a checklist to be used during the development of local development frameworks. The guidance can be found at the following link: <a href="http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/default.aspx">http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/default.aspx</a>	The topics listed in Supplementary File 14 overlap with most SA objectives included in the Core Strategy Interim SA report. IBC will check the guidance and the Supplementary File 14.
			Natural England	General comment	We welcome the efforts made by Ipswich Borough Council in preparing the draft Scoping Report. We are satisfied at present that the Sustainability Appraisal of the Local Plan is proceeding in a proper, logical and comprehensive manner.	N/A

			Natural England	General comment - Approach to SA	We are pleased to see recognition of the Government's objectives for sustainable development. We would advise that reference is made to the requirement for a Habitats Regulations Assessment, required under the Conservation (Habitats and Species) Regulations 2010 to assess the effects of plans, programmes and projects on Ramsar sites.	Reference included in Chapter 1.
			Natural England	Scoping Process	We welcome reference to issues of importance to NE including landscape character, the protection and enhancement of biodiversity and geodiversity, green infrastructure, soils and climate change mitigation and adaption. We would recommend that the SA adopts a suitable topic based approach to assessment of the effects of Plan policies on the environment.	The topic based approach has been adopted through a selection of topic based SA objectives.
			Natural England	Scoping Process	In addition to statutory designated wildlife sites, the effects of the Plan on locally designated sites such as County Wildlife Sites, should be fully assessed through the SA process.	Locally designated sites such as County Wildlife Sites have been taken into consideration and effects on these sites have been assessed. In addition, in order to facilitate the assessment the location of the locally designated sites is shown in GIS maps supporting the assessment.
			Natural England	Scoping Process	The assessment should consider the inter-relationships between topics, for example a number of topics can have a significant influence on biodiversity such as air quality, noise, water quality and resources.	The inter-relationship between topics is considered throughout the assessment.
			Natural England	Scoping Process	The report should reference and consider the objectives of the local Green Infrastructure Plan and the decision making criteria relating to the multi-functionality of the GI network. Objectives and targets of the GI Plan should be used to inform the assessment of impacts on the GI network.	Reference to the standards listed in the Haven Gateway Green Infrastructure Study is made and the objectives have been taken into consideration.

			Natural England	Scoping Process	Recommend consideration of NE's standards for accessible natural greenspace (ANGSt); these provide a set of benchmarks which should be used to ensure new and existing residential development has access to nature. A further useful evidence document in relation to green infrastructure is NEs Analysis of Accessible Natural Greenspace Provision for Suffolk. This identifies levels of deprivation, in terms of access to open space, across the ANGSt standards within each LPA area.	Taken into consideration during the assessment process.
			Natural England	Scoping Process	Regarding potential water resource / quality impacts, reference should be made to the local Water Cycle Study. The findings and recommendations of this should be fully considered as part of the assessment process. Consideration should be given to the deliverability of drainage infrastructure requirements ahead of, or at least in line with, development to ensure environmental impacts are minimised.	The findings and recommendations included in Haven Gateway Water Cycle Study Stage 2 – Ipswich have been taken into consideration with regards to drainage issues, flood risk and surface water and ground water quality. Deliverability is covered in the Implementation Chapter 10 of the Core Strategy.
			Natural England	Scoping Process	Welcome reference to SuDS and advise that the report includes recognition of the multi-functional benefits enhancing landscape, amenity, biodiversity, in addition to drainage and flood management.	The multifunctional benefits of SuDS are included as part of the assessment.
4	Lizzie	Griffiths	Environment Agency	Part 1 Draft Core Strategy Focused Review	We are generally supportive of the topics included in the tables. However, we consider some of these topics could be expanded to incorporate our comments below.	N/A

			Environment Agency	Table 3-2 Issues and Opportunities SA Topic Water	Much of Ipswich, an urban built-up environment and yet water quality has not been identified as a key sustainability issue. Most of the central and western area of Ipswich is designated as Source Protection Zone (SPZ) 2, with two smaller areas designated as SPZ1. SPZs are used to identify those areas close to drinking water sources, where the risk associated with groundwater contamination is greatest, and are important for identifying highly sensitive groundwater areas. SPZs are also recognised within the Environmental Permitting Regulations as a zone where certain activities cannot take place and should therefore be included in the list of key sustainability issues. New development should be encouraged to use Sustainable Drainage Systems (SuDS). These provide the opportunity not only to manage runoff and further reduce flood risk on development sites, as mentioned in the SA report, but also to help protect groundwater and surface water quality.	Water quality is picked up in the assessment framework through sustainability objective ET7. Recommendations to use SuDS are included in the sustainability appraisal. The SA report will include the wide variety of benefits of SuDS such as protection of groundwater and surface water quality.
			Environment Agency	Table 3-2 Issues and Opportunities SA Topic Climatic factors	In this section, it is acknowledged that the risk of flooding may increase as a result of rising sea levels. While the Ipswich Flood Defence Management Strategy will help to reduce flood risk to some areas of Ipswich, it should not be solely relied upon as mitigation. Development should be directed to areas of low flood risk wherever possible, through the Sequential Test process, and highly vulnerable development should not be permitted in the high risk Flood Zone 3.	Considered in the assessment of policies. Where appropriate, recommendations for additional mitigation measures are suggested.
			Environment Agency	Table 3-2 Issues and Opportunities SA Topic Biodiversity	The Scoping Report recognises that opportunities should be sought to develop and enhance the network of public open space. However, it fails to recognise the benefits that can be brought about by seeking opportunities to provide multifunctional open spaces that can help to reduce flood risk, to promote biodiversity and provide recreational areas. These areas can also be a draw for businesses who want to be able to provide an attractive environment to their workers and customers. The provision of both green and blue infrastructure is also important in helping wildlife adapt to the impacts of climate change.	Taken into consideration in the assessment of the revised policies.

			Environment Agency	Table 3-3 SA Objective ET7	Despite not being identified as key issue, we are pleased to note that Water Quality has been included in the SA Objectives. Indicator ET7a is 'water quality in rivers and groundwater quality'. This can be assessed through consideration of whether or not waterbodies are achieving 'good ecological status' or 'good ecological potential' under the Water Framework Directive.	N/A
			Environment Agency	Part 2 Draft Site Allocations DPD Table 5-1 Topic Water	<p>The SA Scoping Report recognises that flood risk should be taken into consideration when allocating sites for development. This should include directing development towards low risk areas through the Sequential Test process, which should be informed by the Ipswich Borough Strategic Flood Risk Assessment. This is particularly relevant to the IP-One Area, of which a relatively large area is currently at high risk of flooding from the River Orwell.</p> <p><b>Appendix A</b> We welcome the inclusion and reference to the Water Framework Directive. This is an important piece of legislation which sets the requirement that nothing should be done to a water body which could cause its status to deteriorate. Ensuring that waste water treatment facilities and infrastructure is adequate enough to ensure the Water Framework is achieved is an important consideration as part of the Core Strategy.</p> <p>The recently adopted Ipswich Development and Flood Risk SPD should be included in the list of relevant local plans and programmes.</p>	<p>Considered in the assessment of site allocations. Where appropriate, recommendations for additional mitigation measures are suggested.</p> <p>Ipswich Development and Flood Risk SPD is included in the list of relevant local plans and programmes.</p>
			Environment Agency	Table 5-1 Topic Climatic Factors	In the SA Topic 'Climatic Factors', it is acknowledged that the risk of flooding may increase as a result of rising sea levels. While the Ipswich Flood Defence Management Strategy will help to reduce flood risk to some areas of Ipswich, it should not be solely relied upon as mitigation. Development should be directed to areas of low flood risk wherever possible, through the Sequential Test process, and highly vulnerable development should not be permitted in the high risk Flood Zone 3. This is particularly relevant to the IP-One Area, of which a relatively large area is currently at high risk of flooding from the River Orwell	Considered in the assessment of policies. Where appropriate, recommendations for additional mitigation measures are suggested.

			Environment Agency	Appendix A	We welcome the inclusion and reference to the Water Framework Directive. This is an important piece of legislation which sets the requirement that nothing should be done to a water body which could cause its status to deteriorate. Ensuring that waste water treatment facilities and infrastructure is adequate enough to ensure the Water Framework is achieved is an important consideration as part of the Core Strategy	N/A
			Environment Agency	Appendix A	The recently adopted Ipswich Development and Flood Risk SPD should be included in the list of relevant local plans and programmes	Included.
5	James	Meyer	Suffolk Wildlife Trust	General comment	It is essential the SA should be an iterative process. It should be ensured that the document recording the appraisal is kept under review so that subsequent amendments to the development plan documents are properly appraised and the outcomes recorded. This should include appraisal of any amendments which arise as a result of other parallel assessment, such as those required through the Habitats Regulations Assessment (HRA) process. The HRA accompanying the adopted Core Strategy and Policies development plan document (The Landscape Partnership, 2009) identified a need, linked to new residential development, for the provision of a significant area of publically accessible open space in order to mitigate potential significant impacts on sites of European nature conservation importance. We consider that it is important that such impacts are also addressed, where appropriate, through the SA and Strategic Environmental Assessment (SEA) processes. Appropriate criteria should be included in the SA in order to appraise this.	Impacts are assessed through the SA process at the next stage. (SA objective ET8 <i>To conserve and enhance biodiversity and geodiversity , including favourable conditions on SSSIs, SPAs and SACs</i> ).
			Suffolk Wildlife Trust	Part One Core Strategy Focused Review 3.3.13 Results from the Review	We support the identification of the objectives to 'conserve and enhance biodiversity as an integral part of economic, social environmental development' and the 'need to protect and enhance biodiversity resources particularly sites of international importance'.	N/A

			Suffolk Wildlife Trust	Appendix B	We recommend that ecological information including that on Country Wildlife Sites (CWS); veteran trees and protected Biodiversity Action Plan (BAP) habitats and species, available from Suffolk Biological Records Centre (SBRC) is used in collating a baseline for this appraisal.	Taken into consideration.
			Suffolk Wildlife Trust	Table 3-3 SA Objective ET8	Recommend that SBRC are included as a source of information under Objective ET8 in Table 3-3.	Included.
			Suffolk Wildlife Trust	5.5.1.2 Baseline Data	In para 5.5.1.2 we suggest that the same objectives are used as those identified in para 3.3.13. Specifically, 'conserve and enhance biodiversity as an integral part of economic, social and environmental development' and the 'need to protect and enhance biodiversity resources particularly sites of international importance'.	The same objectives are used for the assessment of both DPDs.
			Suffolk Wildlife Trust	Table 5-2 Issues and Opportunities	Suggest that the following wording is used in the "Key sustainability Opportunities" for "Biodiversity, Flora and Fauna". We consider that this better reflects the opportunities presented. <i>Development proposals should protect existing habitats and species and should maximise opportunities to enhance habitats or create new habitats in order to deliver the biodiversity objectives of the relevant BAPS. When allocating sites for development the current ecological value of the land should be taken into consideration, alongside the most appropriate use of the land and the proximity of the development to designated sites.</i>	N/A
			Suffolk Wildlife Trust	Appendix A	In 2012 the UK BAP (1994) was succeeded by the UK Post 2010 Biodiversity Framework (July 2012). The list of national plans and programmes in Appendix A should include reference to this document.	Included.
			Suffolk Wildlife Trust	Appendix B Section B-9	Appendix B Section B.9 should include reference to SBRC as a source of data for the first bullet point. This section should also be updated to make reference to the UK Post-2010 Bio Framework (July 2012) succeeding the UK BAP (1994).	Included.

			Suffolk Wildlife Trust	Map 1	Map 1 (Sites of Eco Importance). Update this map to include County Wildlife Sites. Whilst CWSs are recognised in the Scoping Report for the SA they should also be included on this map in order to show an accurate reflection of sites designated for their ecological importance across the borough.	CWSs are included in the GIS maps used in the assessment.
6	Brian	Samuel	Northern Fringe Protection Group	General comment / Appendix B - evidence based approach	A more robust and evidence-based approach for the SA is required that better takes account of the views of the general public which have been shown to be informed and accurate. The NFPG has always supported an employment-led strategy. However, we argued that IBC's Core Strategy (CS) was not sustainable and therefore unsound as it was based on job targets that had no supporting evidence base and were clearly unrealistic and unachievable. The previous SA failed to recognise these legitimate and material concerns and omitted any form of assessment of the implications of the jobs target being unrealistic. Evidence now shows that the jobs target was indeed unsustainable and that the original SA was incorrect in assessing the CS as sustainable.	The employment targets used in the adopted Core Strategy were based on the East of England Plan and its background data, and the 2005 Haven Gateway Employment Study. Delivery is a separate issue and is to do with economic recession.
			Northern Fringe Protection Group	General Comment - consideration of alternatives	We are disappointed that IBC has ditched the employment-led strategy despite this being widely supported by officials, councillors, politicians, businesses and the general public in favour of a housing-led approach. This has been done without any assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy and the associated impacts on sustainability. Such an approach is fundamentally flawed.	The revised strategy set out in Core Strategy Focused Review combines a focus on development delivery with an approach which is policy compliant to the National Planning Policy Framework.

			Northern Fringe Protection Group	General comment - scope of SA	The SA needs to consider the implications of this key change in IBC's strategy and in particular consider the implications of new homes being constructed in Ipswich Borough that will result in either higher unemployment levels in the Borough or new residents having to travel outside the Borough to sites of employment. Previously one of the main arguments that the NF housing development is sustainable was that residents will walk/cycle or travel by bus to new jobs created in Ipswich town centre, which will no longer be the case in a housing-led strategy. The SA of the NF will also need to be revised to take account of this.	The Council has prepared a topic paper on population and household projections and this considers the alternative strategies available to the Council including whether they are policy compliant and realistic in market and deliverability terms. It does not necessarily follow that a larger local workforce will be competing for a smaller number of jobs. For example, some of the population and household growth will be accounted for by people over the retirement age; some residents can travel to jobs using sustainable modes e.g. at Felixstowe, BT Martlesham or London; and at the 2001 Census there was net travel to work into Ipswich.
			Northern Fringe Protection Group	General Comment - consideration of alternatives	We support Paragraphs 2.20 and 2.21 of the IBC Executive paper REF NO: E/13/60 Northern Fringe - Draft Supplementary Planning Document Ipswich Garden Suburb and Sustainability Appraisal confirming that the Core Strategy Focused Review (CSFR) 'will look at alternatives to the Northern Fringe allocation itself'. The Scoping study must include details of how this will be carried out. This should include a 'mapping' of the proposed sites of major employment and new homes in and around Ipswich and analysis of the potential impact and sustainability of likely travel routes. The process should also include an assessment of whether the proposed numbers of proposed new homes and jobs in the area are feasible and sustainable.	See above re separate paper.

			Northern Fringe Protection Group	General Comment - Part One	Clearly sustainability is not just about building sufficient homes to meet anticipated demand but about wider social and environmental issues. The implications of a larger local workforce competing for a relatively smaller number of jobs, for example on average salary levels which have already fallen substantially in Ipswich, need to be fully considered in the SA of the CSFR. Lower average salary levels will inevitably result in higher levels of deprivation and poverty with associated health implications especially in relation to increased fuel poverty. Unless property prices fall to mirror lower average salaries, homes will become even less affordable.	See above. Also refer to City Deal which is being used to address skills issues in the workforce.
			Northern Fringe Protection Group	General Comment - evidence base	The full sustainability implications of the change in the focus of the CS on the wider transport network must also be fully assessed in the SA of the CSFR and in considering alternatives to the Northern Fringe allocation itself. Clearly this can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring authorities that takes full account of relevant employment sites and proposed new housing developments. This needs to assess the impact on air pollution as traffic from the NF will pass through AQMAs and areas of pollution concern as residents travel to work.	The SA assesses the implication of each policy with regards to travel through <i>ET4 To reduce the effects of traffic upon the environment</i> and air pollution through <i>ET1 To improve air quality</i> .

			Northern Fringe Protection Group	General Comment - Part One / Consideration of alternatives	<p>The SA of the CSFR must assess and compare the sustainability benefits of a realistic jobs-led CS to a housing-led strategy. This needs to include relative assessments of a co-operative approach between Ipswich Borough and neighbouring authorities where new homes are built near to the location of new jobs across. Such an approach is required under the NPPF requirement for local authorities to co-operate. We are concerned that the Ipswich Housing Market Area Strategic Housing has not taken full account of neighbouring authorities and could result in sub-optimal decision-making.</p>	<p>Refer to NPPF requirement to meet objectively assessed housing need. The Ipswich SHMA looked at the whole housing market area (Ipswich, Mid Suffolk, Babergh, and Suffolk Coastal).</p>
			Northern Fringe Protection Group	General Comment - Part One / Consideration of alternatives	<p>In particular, the SA of the CSFR needs to consider whether there are alternative brownfield sites outside of the Borough that can accommodate new housing with better access to new sites of employment, such as the Sroughton Sugar Beet site, which would be a more sustainable option than building on the high grade agricultural land of the NF with residents commuting through Ipswich to access employment sites. The impact of utilising sites such as Grafton Rd, Cox Lane and Westgate for a larger number of new homes, rather than leaving them vacant, needs to be appraised.</p>	<p>Sugar Beet Factory site is outside IBC's control. Babergh Core Strategy identifies it for employment to meet job needs. People living there would still need to travel through Ipswich to job opportunities. Plan has to be realistic - in terms of Coastal and Babergh which have just completed Core Strategy processes and market delivery of housing on brownfield sites.</p>

			Northern Fringe Protection Group	General Comment - Part One	<p>The current CS allows for a phased approach for the development of the NF and the previous Suffolk County Council Northern Fringe Sustainability Appraisal and the Core Strategy independent Inspection judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the entire NF without any locational restrictions. A detailed examination of the implications of this change must be included in the new SA along with a full assessment of the rationale behind the proposed changes. This should include analysis of the comparative risks of unfinished sites and/or stalled developments being left on the NF for whatever reason. This is already a major problem for Ipswich in relation to the waterfront developments, as a result of the unsustainable multi-starts that were allowed to commence and become a major blight on Ipswich.</p>	<p>The SA of revised policy CS10 fully consider the implications of multiple starts compared to the original CS10. The majority of mitigation measures proposed to reduce significant negative effect will involve a number of infrastructure improvements (SuDS, pedestrian and public transport infrastructure such as bus stops, etc.) and multiple starts will allow a more comprehensive construction planning.</p>
			Northern Fringe Protection Group	Table 2-1 Stages in SA Process	<p>Stage A runs from September to October 2013 and includes this consultation process, which has a submission date of 28th November 2013. Clearly Stage A needs to be extended and allow time for the inclusion of comments from the consultation process.</p>	<p>Updated.</p>

			Northern Fringe Protection Group	Table 2-1 Stages in SA Process	Stage B, running to the end November 2013 does not provide sufficient time given the proposed shift to a housing-led strategy. The DPD assessment and evaluation process needs consider the relative merits of a realistic jobs-led strategy compared to a housing-led approach and the cross-boundary implications between Ipswich Borough and neighbouring authorities.	Updated.
			Northern Fringe Protection Group	Table 2-1 Stages in SA Process	Stage D. We object to the proposed consultation of the SA during the summer holiday period given its importance. We are pleased that IBC has listened to our concerns with other proposed major consultations being released over the Xmas holidays by commencing them in early January instead. We would be grateful if similar consideration be given to the scheduling of the SA consultation. The timetable should also allow for the SA to go before the Executive/Council.	IBC aims to avoid holiday periods but it is not always possible.

			Northern Fringe Protection Group	Table 2-1 Stages in SA Process	Given the work required in the new SA and the previous delays/issues with the NF SPD appraisal, we have some concerns with the timescales. Sufficient resources need to be made available to ensure a robust SA is completed in a timely manner.	IBC has appointed consultants to undertake the work and they will provide the necessary resources.
			Northern Fringe Protection Group	3.2.1 Review of Core Strategy	Paragraph 3.2.1 needs to reference the proposal for the Core Strategy to no longer be jobs-led but a housing-led strategy. The SA must compare and assess the relative benefits of these alternative strategic approaches and alternatives to the NF allocation itself as committed to by IBC in the recently approved Executive paper REF NO: E/13/60.	The emphasis now through the NPPF is on delivery so the strategy is more delivery focused. For housing it aims to meet needs, for employment local and regional strategies aim to play to the area's sectoral strengths.

			Northern Fringe Protection Group	3.3.2, 3.3.11, Table 3-1, PPPs	Paragraphs 3.3.2 and 3.3.11 and Table 3-1 need to specifically reference the CSs of neighbouring authorities and the critical work of the Ipswich Policy Area Board given the duty to cooperate and the proposed approach to build homes in Ipswich Borough for people working outside the Borough. These are more important than the New Anglia Local Enterprise Partnership 'Towards a Growth Plan' 2013, which is more of a wish list than an evidence-based document. The quoted growth forecasts are out of date.	Table 3-1 just summarises the NALEP plan. Reference to the neighbouring Core Strategy is included.
			Northern Fringe Protection Group	Table 3-1 PPPs	Table 3-1 should refer to Ipswich Borough-specific data rather than quoting East of England data and should reference the most recent data e.g. the EEFM August 2013 modelling. This projects a lower level of jobs than previously. Population 2011: 133.7k 2031: 163.4k Increase: 29.7k (22.21%) Resident jobs 2011: 63.2k 2031: 71.4k Increase: 8.2k (12.97%) This means that additional residents will either have to commute outside of Ipswich Borough to find work or will be unemployed; neither of which is sustainable.	Aug 2013 modelling results came out too late to inform this draft but will be taken into account in future drafts of the plan.

			Northern Fringe Protection Group	3.3.9 PPPs	The East of England Plan is no longer relevant.	3.3.10 indicates that it has been revoked.
			Northern Fringe Protection Group	3.3.12 PPPs	PPPs needs to be defined here rather than later in the document.	Agreed and will be updated in final SA Report.

			Northern Fringe Protection Group	3.4.1.3 Question B	Ipswich Central's vision for Ipswich needs to be considered <a href="http://ipswichcentral.com/thebigdebate/">http://ipswichcentral.com/thebigdebate/</a> along with the work of the Ipswich Policy Area Board especially in relation to employment and the 2012 Air Quality Updating and Screening Assessment for Ipswich Borough Council (January 2013), which concludes that 'St Matthews Street and Woodbridge Road are both areas where NO2 results were high. These areas have therefore undergone a detailed assessment and as a result AQMA's will be declared.'	The additional AQMAs have not yet been declared - boundaries are being considered.
			Northern Fringe Protection Group	Table 3-2 Issues and Opportunities / Appendix B7	Table 3-2 needs to reference the proposed new AQMAs (as does Appendix B.7) as referenced above and utilise more recent data where available. There are also opportunities to improve cross-town transport infrastructure and access to the A14/A12. This will become a fundamental requirement if the CS is changed to housing-led as residents will need to be able to easily commute to employment sites outside the Borough.	See above

			Northern Fringe Protection Group	4.1 Geographical Scope	As the CSFR proposes to a housing-led strategy with residents commuting to jobs outside of Ipswich Borough, the SA clearly needs to undertake a full and detailed assessment of the associated travel implications outside of Ipswich Borough.	<p>The purpose of the SA is not to undertake detailed transport assessments. That would be considered through transport modelling once 2011 Census Travel To Work data has been published.</p> <p>The SA assesses the implication of each policy with regards to travel through <i>ET4</i> To <i>reduce the effects of traffic upon the environment</i>.</p>
			Northern Fringe Protection Group	4.2.1.1 Aspects of DPD to be assessed	<p>Paragraph 4.2.1.1 needs to make clear that the proposed CSFR is no longer a jobs-led strategy but a housing-led strategy. To fail to mention this fundamental change is misleading and lacks transparency. Likewise the major proposed changes to CS10 need to be outlined here i.e. the intention to allow simultaneous multiple starts across all three areas of the NF without restricting the number of construction sites at any one time etc and prior to the agreement of a Masterplan also needs to be specifically mentioned.</p>	See above.

			Northern Fringe Protection Group	4.2.2 Assessment of Alternatives	As stated above, the SA of the CSFR needs to assess the alternative of an evidenced-based jobs-led strategy. It also needs to assess the alternative of a phased and controlled development of the NF that does not allow multi-site starts or places restrictions on when the three areas of the NF can be developed and/or on the number of sites that can be developed in any one area at the same time.	Done through the assessment process of alternatives.
			Northern Fringe Protection Group	6.2.2 Aspects of DPD to be assessed	Paragraph 6.2.2 the SA of site allocations DPD needs to consider the relative benefits of having new housing built in neighbouring authorities nearby new employment sites compared to housing being built in Ipswich that requires residents to commute to new employment sites outside of Ipswich. It also needs to assess the relative benefits of more housing being built in the town centre for example on the Westgate site as proposed in the Ipswich Central vision for Ipswich and on the Grafton Way site.	The SA cannot assess the effects of developments located outside the boundary of the Borough.
7	Barbara	Robinson	Save our Country Spaces	N/A	SOCS strongly object to the change by IBC within the SPD issued on 15th November by removal of text from 'Establishing Priorities' within its Chapter 2 Vision and Core Objectives for Core Strategy Policy Area CS10 as this is likely to have a significant adverse impact on the steer and sustainability of the Core Strategy Focused Review.	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.

			Save our Country Spaces	General comment	SOCS to date have failed to see a Sustainable Development Strategy which outlines the over-arching Government objective to raise the quality of life in our communities referenced within the Hyder SASR. Assessed need is weak within the document.	Core Strategy sets out the sustainable development strategy. Assessed housing need will be identified in a separate paper. This scoping report sets the framework for the future assessment of the plans.
			Save our Country Spaces	General comment / Core Strategy CS10	As an Environmental Impact Study will not be delivered until the end of the exercise and will be done by the developers, - almost at a point of no return- it is hard to securely ascertain whether the revision of the Core Strategy and changes to CS10 are sustainable.	The purpose of the scoping report is to set the framework for the SA not to undertake the SA.
			Save our Country Spaces	General comment	SOCS feel the NPPF guidance structured around specific sections indicates a predominantly negative ( N) rather than a positive outcome, specifically for: Building a strong, competitive economy; Ensuring the vitality of town centres; Supporting a prosperous rural economy; Promoting sustainable transport; Supporting high quality communications infrastructure; Promoting healthy communities; Protecting Green Belt land; Meeting the challenge of climate change, flooding and coastal change; Conserving and enhancing the natural environment; Plan-making; Decision-taking.	The purpose of the scoping report is to set the framework for the SA not to undertake the SA.
			Save our Country Spaces	N/A	Having appraised the available evidence base and applied a grass roots knowledge of the area and the town, SOCS feel that the deliverability and viability of the NF developments together with potential short, medium and long term adverse social, economic and environmental impacts of proposals present possible unacceptable adverse effects for the entire Ipswich population. SOCS suggest that sustainable development proposed on the NF is, in its present form, highly questionable.	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.

			Save our Country Spaces	General comment	The Hyder SASR is highly selective and imbalanced.	The scoping report is produced in compliance with the relevant legislation and baseline data are gathered from various available sources.
			Save our Country Spaces	Appendix A	Ipswich Housing Market Area Strategic Housing is unsound as it failed to assess this with other LAs required under Duty to Cooperate.	See earlier comment re NFPG - SHMA was joint research and looked at whole housing market area.
			Save our Country Spaces	Appendix A	The Suffolk Growth Strategy March 2013 - referenced with in the Hyder SR appears more hot air and aspiration than substance. The language it uses is unwise and cannot be validated. It applies less to IBC than other LAs.	As a Suffolk strategy for growth it is a key document for Ipswich and is therefore included in the list of plans policies and programmes.
			Save our Country Spaces	Appendix A	New Anglia Local Enterprise Partnership 'Toward A Growth Plan 2013- SOCS suggest the Confidence Factor here is totally misplaced with respect to Ipswich's situation.	The NALEP Growth Plan is a key document for Ipswich and is therefore included in the list of plans policies and programmes.

			Save our Country Spaces	Appendix A	Suffolk Haven Gateway Employment Land Review-Flags up the importance of the A14 and surrounding area, which is a more realistic scenario for employment as suggested by NFPG and SOCS.	This document has been included in the list of plans policies and programmes.
			Save our Country Spaces	Appendix B	Population data has been selectively and subjectively presented and should show the pattern over a range of time scales, bearing in mind the population of Ipswich in 1960 mid way was 126,000 when a similar level of expansion was being planned AND got halted after an initial start; the problematic legacy which still exists within Ipswich today and is recently paralleled within Ipswich Docks.	Population change is shown annually from the 2001 Census and the course is the ONS. A separate topic paper on population will be prepared as part of the evidence base for the plan to fully set out the modelling the Council has used.
			Save our Country Spaces	N/A	Sewage and water issues constraints and resolutions need further confirmation. Community Steering panel were promised an update on this from Anglian Water March 2013.	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.
			Save our Country Spaces	Appendix B	There is added dissatisfaction with reliance on questionable and previously unreliable projections and modelling of future needs which translate into targets. (Projections which agency such as OEM readily admits are an imprecise science and were overly optimistic). These targets themselves appear, on close scrutiny, to be unsustainable. Lack of consistency by the Borough in using consistent modelling methodology adds to the problem	A separate topic paper on population will be prepared as part of the evidence base for the plan to fully set out the modelling the Council has used.

			Save our Country Spaces	General Comment / Appendix B	With regard to Sustainability Appraisals, Strategic Environmental Assessments and Scoping work, there has been criticism of the fitness for purpose of this vital work by the main residents groups. This may be in part due to paucity of available data and available information being provided by IBC at the outset to the independent company. It may have been in part due to unrealistic expectations by IBC as to the necessity and extent of the work which would be required.	This is the first stage in the SA for the Core Strategy Focused Review and Site Allocations DPD. Data have been made available and/or is accessible via the Internet.
			Save our Country Spaces	N/A	The initial failure of IBC to conduct a formal SEA Screening Exercise to evaluate potential social, economic and environmental impacts of their emerging plans for the Northern Fringe at the outset of the masterplanning work was unfortunate. If this had been addressed properly, it would have clearly demonstrated their obligation under the SEA Directive 2001/42/EC. The statement below from Executive paper E/13/60 26th November 2013, 2.2, finally validates resident groups' stance on this obligation with the final recognition and acceptance by IBC's Executive of obligation under the SEA Directive 2001/42/EC2 for the IBC's North Fringe/Ipswich Garden Suburb SPD. '2.2 The development of the Northern Fringe involves major challenges due to its large-scale, multiple ownership, the need to incorporate a wide range of supporting infrastructure and the mitigation of impacts on local communities.'	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.

			Save our Country Spaces	N/A	SOCS feel the following comment from Executive paper E/13/60 26th November 2013 is disingenuous and misplaced. (SOCS emphasis) '2.21 NFPG/SOCS were, at their request, afforded the opportunity to comment on earlier draft versions of the SEA/SA and their views are attached as appendices 3-5. The SEA/SA as well as the draft SPD has been amended in response, e.g. by removing sequencing diagrams which it is agreed were too prescriptive at this stage. However, many comments made by these groups conflate the principle of the development with its environmental effects.' If proper consideration of the environmental and wider concerns and had taken place in a timely fashion, then current difficulties with the scope of the SPD may have been avoided. SOCS always held the view it had been wrong to re classify the North Fringe work from a DPD to an SPD status. Rather than conflating the principle of development, SOCS believe the environmental effects and possible impacts are fundamental to that principle of development on Sustainability grounds. As already stated, an Environmental Impact Study will not be delivered until the end of the exercise and will be done by the developers; - almost at a point of no return- it is hard to securely ascertain whether the revision of the Core Strategy and changes to CS10 are sustainable.	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.
			Save our Country Spaces	General Comment	It appears, following SOCS conversation with Wild Anglia, that IBC have failed to meet their obligations to inform all Statutory stakeholders for the SASR. Does this mean the statutory notice period for consultation may need to be extended?	The Council consulted Wild Anglia on the draft Scoping Report but received no comments from them.

			Save our Country Spaces	Part One Core Strategy	<p>The manner and delivery of last minute, poorly drafted revisions and additions to the Executive paper on the 15th October on CS10 were, in SOC's view totally unacceptable, and in breach of their own policies, (protocols and SCI) . The unacceptably poor practice, was possible outside proper process in the public's view. The subsequent failure by IBC to properly clarify the changes and place them in the public domain in a timely and transparent fashion added to the confusion and was not in the best public interest. SOCS consider this breach of process to be further example of maladministration and may pursue this as a complaint or further, at the appropriate time through examination of the CSFR. Whilst this may appear to digress from the purpose of this response to the SA Scoping Consultation, SOCS feel the above criticism of the process is key and material to it. SOCS is still unclear about the full future implications these last minute changes might have on the soundness and sustainability of the Core Strategy and DPD as there has been insufficient time to appraise this situation and seek our own independent legal opinion. It is SOCS (&amp; NFPG ) worry, that the changes and revision to CS10, are essentially so great and so fundamental a change in direction and steer for the Borough , that there may be seriously undesirable unintended consequences which should be properly referenced, appraised and evaluated within this SA Scoping report. The CS10 revision /changes currently are not even properly referenced nor track changed within the SASR.</p>	<p>This Scoping Report sets the framework for the appraisal of policies including revised CS10. The policy appraisal itself follows on from this scoping stage.</p>
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			Save our Country Spaces	Part One Core Strategy	<p>It is SOCS (&amp; NFPG) worry, that the changes and revision to CS10, are essentially so great and so fundamental a change in direction and steer for the Borough, that there may be seriously undesirable unintended consequences which should be properly referenced, appraised and evaluated within this SA Scoping report. The CS10 revision /changes currently are not even properly referenced nor track changed within the SASR. Equally, there is no reference or evaluation as to whether an SPD status document was/is a suitable vehicle to take these proposals forward to a proper sustainable conclusion. This therefore does not follow best practice guidance issued by the Chief Planner and DCLG in 2012. The verbal claim by IBC officers that changes and revision to policy CS10 within the CSFR were deemed necessary to prevent the risk of unfettered development via early planning applications before the due processes were completed is as yet, an untested and unevaluated opinion. It should be a proposal that is referenced and explored within this scoping document. If planning consents by legal challenge was deemed to be a risk, references should be made to the guidance 2012 from DCLG 6 and an evaluation of the relative risks incorporated within the SA SR.</p>	<p>It is not the role of the Scoping Report to list the policies. The Scoping Report sets the framework for the appraisal of policies.</p>
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				N/A	<p>SOCS have always pragmatically supported a jobs-led / employment - led Local Plan and Core Strategy. This is deemed as a proportionate, balanced and sensible approach which would engender much public support. However, the public cannot and will not support a skewed and unsustainable homes led policy approach which they consider to be unsound. The public look to Spain, Ireland and Portugal who have learnt this fundamental fact to their cost. The public feel attempting to build your way out of recession is not going to work, especially in Ipswich. Yes, IBC have repeatedly consulted the public but have repeatedly failed to listen and respond to the public's majority common sense view. As Russell Williams CEO stated at the IBC Examination in public 2011, the danger is of the tail wagging the dog; with Central Government and business landowner /developer pressure taking precedence over the publics' expressed views and wishes for the town. SOCS key concern is that if this development were to be allowed to proceed in it's current form, the long term success of the proposals are questionable, and likely to be unsustainable on viability and deliverability grounds -due to insufficient profits being generated to reliably deliver the necessary infrastructure and mitigation, together with sufficient resources being reliably available for medium and long term maintenance obligations generated by the sites needs. The Environment Agency already is looking to local resolution and mitigation by neighbourhood voluntary groups to address the likely shortfall of resources. The new prospective home owners may balk at the imposition of a long term maintenance levy applied in perpetuity for services which are to be accessed and enjoyed by the whole of the Ipswich population and the IPA.</p>	<p>Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.</p>
			Save our Country Spaces	General comment - omission	<p>No mention is made in this Scoping report, nor in earlier iterations by Hyder of the long standing requirement to mitigate for the pressures inter authority on the RAMSAR sites, Deben and Orwell as per their joint SA/SEA commitment agreed with Suffolk Coastal District Council and further strengthened by legal challenge by Suffolk Wildlife Trusts evaluation on impacts.</p>	<p>An Appropriate Assessment is being carried out and it will be referenced in the final Sustainability Report.</p>

			Save our Country Spaces	General comment - alternatives	Where is the Plan B or alternatives referenced? Where is there evidence of wiggle room; where is an evaluation of what will happen if one or more landowners/developers face either logistical difficulties (unforeseen or in the natural course of events) or financial difficulties, or both?	This comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report, however the consideration of reasonable alternatives for the Core Strategy Focused Review and Site Allocations DPD will take place at the next stage in the SA process.
			Save our Country Spaces	N/A	What are the contingency measures proposed if, having started development, (especially with the prospect of multiple starts), a default situation arises or Central government yet again moves the goal posts on anticipated Section 106 or CIL infrastructure funding. This may allow the impact of viability considerations to override local identified needs? This may lead to non delivery of vital infrastructure and render the development unsustainable.	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.
			Save our Country Spaces	N/A	Where is the independent market surveillance and anecdotal, but valuable evidence to halt matters if unsustainable development ensues and the need arises? What efficacy does the IBC AMR have to directly influence the phasing and rate of development and halt it if necessary? Should not this be given equal weight and material consideration within the Courts if there is a developer landowner challenge?	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.
			Save our Country Spaces	General Comment	Where is the empirical evidence that IBC is paying due attention and heeding National Plans and Programmes cited in the Hyder Scoping Report (such as one of the most important documents reviewed) namely the Sustainable Development Strategy which outlines the overarching Government objective to raise the quality of life in our communities?	One of the tests of soundness is that a plan is justified, which means it should be based on proportionate evidence.

			Save our Country Spaces	Appendix B	<p>Raising the quality of life in our communities is vital considering the identified problems highlighted within IBC AMR and in the current difficult climate of economic problems facing Ipswich, many of which are effectively beyond their capacity to control; re Traffic /congestion/ pollution, educational underachievement, ( all SCC ) unemployment rates economic inactivity- (Local Business &amp; market forces) - inaccurately portrayed within the Hyder document as below national averages but are they not higher in Ipswich? - urban cramming and resultant deprivation, and difficulties experienced with lack of social housing and inadequate health and social care service delivery (SCC CCGs and Central Government). Effectively the Borough only has control over urban cramming (and resultant deprivation), and difficulties experienced with lack of social housing - both areas which they also appear to have limited control over due to developer and landowner pressure under the steer of the current Central Government Build at All cost/ Build at Any Cost Agenda! The revision CS10 and Focused Review of the Core Strategy reflects that central dilemma. SOCS recognise this is a difficult place to be.</p>	Quality of life is picked up in sustainability objective HW2.
			Save our Country Spaces	General comment - omission	<p>Environmental constraints such as the recent 50% cut in direct government funding to the Environment Agency for flood re-mediation and maintenance will have a significant impact on sustainability and need to be explored within the SA/SEA.</p>	<p>Flooding issues are picked up in sustainability objective ET7. The Ipswich flood defences are due for completion in 2018.</p>

			Save our Country Spaces	General Comment - omission	Equally important bearing in mind Ipswich's BC obligations on formal AQMA problems is the referencing of the recent DEFRA consultation which ended September 2013 and IBC's responses to it in the light of their identified and ever growing air quality problems which will be further impacted by the NF proposals. This should be covered within this report. There is a need therefore to reinvigorate and refocus LAQM on action to help the UK meet EU air quality standards and to clarify its role alongside other actions to improve air quality (by national government etc) and to highlight what local authorities can do through working together to improve air quality. Failure to incorporate, reference and evaluate this important information, which has been identified as one of the key environmental issues and constraints on the NF proposals, weakens and devalues the purpose of this Scoping report. SOCS would suggest if IBC's specialist Public Health and Air Quality Management / Climate Change Officers have not been formally invited to contribute to this Scoping exercise, this is tantamount to negligence.	Air quality is picked up in sustainability objective ET1.
			Save our Country Spaces	General Comment	<b>SOCS sign up to the NFPG Comments also (see above). Those where SOCS add further comments are listed below with SOCS' additions shown in italics.</b>	N/A
			Save our Country Spaces	General Comment	We are disappointed that IBC has ditched the employment-led strategy despite this being widely supported by officials, councillors, politicians, businesses and the general public in favour of a housing-led approach. This has been done without any assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy and the associated impacts on sustainability. Such an approach is fundamentally flawed. <i>It may also be unnecessary as just as IBC jobs target deficit was addressed at inspection by alternative arrangements to met the jobs quota from the Ipswich Policy Area IPA so likewise can the housing targets under Duty to Cooperate and Localism.</i>	The revised strategy set out in Core Strategy Focused Review combines a focus on development delivery with an approach which is policy compliant to the National Planning Policy Framework.

			Save our Country Spaces	General Comment	<p>Clearly sustainability is not just about building sufficient homes to meet anticipated demand but about wider social and environmental issues. The implications of a larger local workforce competing for a relatively smaller number of jobs, for example on average salary levels which have already fallen substantially in Ipswich, need to be fully considered in the new SA. Lower average salary levels will inevitably result in higher levels of deprivation and poverty with associated health implications especially in relation to increased fuel poverty.</p> <p><i>This is particularly relevant to IBC as it is essentially a relatively low waged economy, compared to other local LAs, with comparatively young demographic.</i></p>	<p>The Council has prepared a topic paper on population and household projections and this considers the alternative strategies available to the Council including whether they are policy compliant and realistic in market and deliverability terms. It does not necessarily follow that a larger local workforce will be competing for a smaller number of jobs. For example, some of the population and household growth will be accounted for by people over the retirement age; some residents can travel to jobs using sustainable modes e.g. at Felixstowe, BT Martlesham or London; and at the 2001 census there was net travel to work into Ipswich.</p>
			Save our Country Spaces	General Comment	<p>The full sustainability implications of the change in the focus of the CS on the wider transport network must also be fully assessed in the new SA. This can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring authorities that takes full account of relevant employment sites and proposed new housing developments. This needs to assess the impact on air pollution as traffic from the NF will pass through AQMAs and areas of pollution concern as residents travel to work.</p> <p><i>Fit for the 21century solutions are already causing problems at Civic Drive, where removal of a perfectly serviceable roundabout appears to be further exacerbating congestion and pollution. A review of SCC transport solutions for Tuddenham Road and Westerfield will be required to address these unsustainable transport solutions.</i></p>	<p>See above.</p>

			Save our Country Spaces	General Comment	<p>The new SA must assess and compare the sustainability benefits of a realistic jobs-led CS to a housing-led strategy. This needs to include relative assessments of a co-operative approach between Ipswich Borough and neighbouring authorities where new homes are built near to the location of new jobs across. Such an approach is required under the NPPF requirement for local authorities to cooperate.</p> <p><i>The Actions under Duty to Cooperate issued by DCLG in 2012 requires a statement of actions by IBC. The regulations also require you to report to your communities on the actions you have undertaken under the Duty to Cooperate. In addition to the transparency benefits this brings, it will be beneficial when it comes to showing compliance with the Duty to Cooperate at examination on any forthcoming Local Plans, either yours or ones you have an interest in.</i></p>	Refer to NPPF requirement to meet objectively assessed housing need. The Ipswich SHMA looked at the whole housing market area (Ipswich, Mid Suffolk, Babergh, Suffolk Coastal).
			Save our Country Spaces	General Comment	<p>In particular, the SA needs to consider whether there are alternative brownfield sites outside of the Borough that can accommodate new housing with better access to new sites of employment, such as the Sproughton Sugar Beet site, which would be a more sustainable option than building on the high grade agricultural land of the NF with residents commuting through Ipswich to access employment sites.</p> <p><i>SOCS are pleased there is recognition within the Executive report 26th November that acknowledges this requirement and states suitable alternatives will be explored at SA of the CSFR.</i></p>	Sugar Beet Factory site is outside IBC's control. Babergh Core Strategy identifies it for employment to meet job needs. People living there would still need to travel through Ipswich to job opportunities. Plan has to be realistic - in terms of Coastal and Babergh which have just completed Core Strategy processes and market delivery of housing on brownfield sites.

			Save our Country Spaces	General Comment	<p>The current CS allows for a phased approach for the development of the NF and the previous Suffolk County Council Northern Fringe Sustainability Appraisal and the Core Strategy independent Inspection judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the entire NF without any locational restrictions. A detailed examination of the implications of this change must be included in the new SA along with a full critique of the rationale behind the proposed changes.</p> <p><i>The suggested possibility of a multi start approach, whilst appearing to easy delivery of infrastructure may also pose the risk if one or more developer / landowner hits financial or other problems. As stated earlier in SOCS response, what contingency is there within the proposals if to market forces or other difficulties impact on infrastructure delivery ,the added burden which may fall on remaining landowners /developers , thereby making their operation unviable and halting their delivery? The land having been committed, will be blighted for years will little sound chance of resolution as happened locally at the Ipswich Dock/Waterfront and in Ireland. This is a fundamentally unsustainable situation. A safety net fund needs to be arranged and established as mitigation, -reserve matters? - or perhaps Grampian Conditions with front loaded finance ahead of any planning permission being granted and started. Grampian Conditions are not referenced or mentioned within the Hyder Scoping report.</i></p>	See above.
			Save our Country Spaces	3.4.1.3	<p>Paragraph 3.4.1.3 Ipswich Central's vision for Ipswich needs to be considered <a href="http://ipswichcentral.com/thebigdebate/">http://ipswichcentral.com/thebigdebate/</a> along with the work of the Ipswich Policy Area Board especially in relation to employment and the 2012 Air Quality Updating and Screening Assessment for Ipswich Borough Council (January 2013), which concludes that 'St Matthews Street and Woodbridge Road are both areas where NO2 results were high. These areas have therefore undergone a detailed assessment and as a result AQMA's will be declared.'</p> <p><i>Or substantive changes, additional AQMA or enlargement made to existing AQMA which are being impacted by NF proposals.</i></p>	The additional AQMAs have not yet been declared - boundaries are being considered.

			Save our Country Spaces	4.1	As the revised CS proposes to a housing-led strategy with residents commuting to jobs outside of Ipswich Borough, the SA clearly needs to undertake a full and detailed assessment of the associated travel implications outside of Ipswich Borough. <i>Any update on out of date SCC Survey data?</i>	This is not a job for the SA and would be considered through transport modelling once 2011 Census Travel To Work data has been published.
8	Katharine	Fletcher	English Heritage	General comment / Appendix B Baseline Data / Table 3-3 ET9	The draft report is lacking in detail at this stage in relation to the historic environment. We would request that further consideration is given to how can be strengthened.	The detailed assessment will be undertaken at the next stage.

				<p>General comment</p>	<p>With regard to the scope of the policies to be appraised, we note that this is a focused review, particularly relating to the delivery of housing and employment. Notwithstanding this, we would recommend that the implications of the National Planning Policy Framework (NPPF) in relation to other, generic, policies should be considered. The NPPF identifies the historic environment as a key dimension of sustainable development in para 7, and it is included within the core planning principles in para 17. We would wish the local plan allocations, and general policies, to take account of the contribution that the historic environment makes to sustainable development at both a strategic and detailed level.</p>	<p>The Scoping Report picks up historic environment matters under sustainability objective ET9 and in the baseline data at Appendix B B10. The Core Strategy Focused Review also proposes minor amendments to policies including those on historic environment to reflect the NPPF. A detailed consideration of the impact of the NPPF on the adopted Core Strategy was considered by the Council's Executive Committee on 14th August 2012</p> <p><a href="https://democracy.ipswich.gov.uk/Data/Executive/20120814/Agenda/E-12-30_-_Impact_of_the_National_Planning_Policy_Framework_on_the_Adopted_Ipswich_Core_Strategy_-_Appendix.pdf">https://democracy.ipswich.gov.uk/Data/Executive/20120814/Agenda/E-12-30_-_Impact_of_the_National_Planning_Policy_Framework_on_the_Adopted_Ipswich_Core_Strategy_-_Appendix.pdf</a></p> <p><a href="https://democracy.ipswich.gov.uk/Data/Executive/20120814/Agenda/E-12-30_-_Impact_of_the_National_Planning_Policy_Framework_on_the_Adopted_Ipswich_Core_Strategy.pdf">https://democracy.ipswich.gov.uk/Data/Executive/20120814/Agenda/E-12-30_-_Impact_of_the_National_Planning_Policy_Framework_on_the_Adopted_Ipswich_Core_Strategy.pdf</a></p>
				<p>General comment / Appendix B Baseline Data</p>	<p>A further requirement of the NPPF is that local plans should set out a positive strategy for the historic environment (para 126). In relation to this, it will be essential to ensure that there is a solid foundation in the SA/SEA relating to the evidence base for the historic environment, and the issues and trends that are evident in the local plan area that can potentially be influenced by the plan. To enable the SA/SEA to play its full part, it may be helpful to prepare a brief topic paper for the historic environment, bringing together the baseline data and the relevant issues. English Heritage has published guidance in relation to SA/SEA and the historic environment, which is available on the Historic Environment Local Management (HELM) website. This refers to a range of data sets that can be publically accessed. The document also includes recommendations relating to potential indicators.</p>	<p>The assessment takes into consideration the protection and conservation of the historic environment by assessing the potential effects of the plan with regards to following objectives: ET9 <i>To conserve and enhance the historic environment, heritage assets and their settings</i> and ET10 <i>To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.</i></p> <p>The revised policies are not directly related to conservation of the historic environment, other policies previously assessed address this topic.</p>

				Table 3-3 ET9	We note in the report that you refer to heritage assets at risk, and this an issue underlined in para 126 of the NPPF. In order to ensure that the SA/SEA report is up to date, we recommend that you refer to the latest information in English Heritage's 2013 register, which is available on our website: <a href="http://www.english-heritage.org.uk/publications/har-2013-registers/">http://www.english-heritage.org.uk/publications/har-2013-registers/</a>	The latest register will be used during the assessment of potential effects. (Heritage at risk register 2013, East of England).
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