Development and Archaeology Supplementary Planning Document, Consultation Statement, October 2018

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 Development and Archaeology 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 Development and Archaeology 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 development and archaeology for which additional information would be helpful; and

- Full Public Consultation on the Draft Development and Archaeology 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.

<u>Consultation on the draft Development and Archaeology SPD, May-July 2018</u>

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 Development and Archaeology SPD carried out 25th May - 9th July 2018, and the Council's response indicating whether and where the document has been amended.

Table 1 Consultation comments received on the draft Development and Archaeology SPD, May-July 2018

Respondent	Comment	IBC response
Private individual 1	It covers a lot of ground and a lot of potential audiences, is there any chance of you securing a small amount of money to get it to a graphic designer who may be able to signpost the various sections?	IBC Design team have been commissioned to design the final look of the document, and sections will be hyperlinked for ease of navigation
Private individual 1	Re the Archaeology of Ipswich appendix this has loads of great stuff, however the multiplicity of authors has left it a bit uneven in terms of format and conclusion. For example the Roman section says clearly that a specific villa (with two names and under a housing estate- what a curatorial nightmare!) is nationally important but the mid and late Saxon sections do not say that the remains of this period are potentially nationally important although this is implied. You could perhaps add a statement to the end of each section along the lines of 'The archaeology of middle Saxon Ipswich is of exceptional interest and previous investigations have demonstrated the presence of numerous currently unscheduled heritage assets of this period that have the potential to be of national significance, including burial remains (barrow/coffined/boat burials), pottery manufacturing sites, domestic urban	Section headings within the appendix have been made consistent, and a statements added to the Saxon/Medieval section as suggested.

Respondent	Comment	IBC response
	and defensive structures and waterfront/waterlogged deposits'.	
Private individual 1	Re Research priorities p52 - this reads a mixed list of broad research priorities/perspectives, action points and a point about churches which looks a little odd on its own given there must be a raft of other key questions. It could be divided into broad research perspectives then a series of short bullet points could be added covering broad themes for each period in anticipation of a more developed research agenda.	Research aims re-structured slightly, but left as research priorities covering new development in areas of the town. Reference added, however, to the potential for a more developed research agenda here and on page 71, which is also amended to avoid imbalance in the research questions set out.
Private individual 1	Re p61 para 4 – Seems like there is some text missing as the college is discussed as if it has already been introduced.	Introductory paragraph to the site has been expanded to note the presence of the remains of Wolsey's College. Further references added to the College on pages 53 and 62.
Private individual 2	Document needs restructuring. 1. Overall, the SPD is an extremely helpful document, and is much to be welcomed. The definition of archaeological character areas for the Borough is especially helpful. 2. My major comment concerns the length and structure of the document, and its intended audience(s). The document is quite long, and I also wonder who is going to use it, and how. Large developers will use professional consultants who are familiar with archaeological procedures; smaller applicants probably won't have the time or the inclination to work through so much detail (which anyway may not be relevant for small developments, or for ones which are likely to have only limited archaeological impacts). This led me to wonder whether you could structure the document rather differently, as follows: (1) a short general introduction to the archaeology of Ipswich and why it is important. It would be good to say, right at the start and fairly succinctly, that Ipswich's archaeology is internationally important (because it is one of only four international ports in	Earlier drafts of the document were structured in different ways, but the final structure was decided to reflect the document's primary role as a planning document. Therefore, the planning guidance needs to be clear and accessible, with supporting information set out (and sign posted) in the appendices. The main structure has been left as is, but modifications made to address the detail of the comments: 1) Section 1 provides a concise introduction, and to provide further clarity the 'About this document' section has been moved from the back cover to the beginning. Reference to Sutton Hoo added. 2) A table has been added under Figure 5, providing descriptions of character zones and a matrix as set out. 3) Flowcharts have been left as they were.

Respondent	Comment	IBC response
	England of the Middle Saxon period), and that it is also nationally important in various other respects. Maybe bullet points would be a good way of getting the main messages across? Might it be worth mentioning Sutton Hoo (which is very well-known) as part of the wider archaeological context of Ipswich? (2) A map and short descriptions of the archaeological character areas - maybe with some kind of table/matrix indicating the sensitivity and likely requirements/responses in each area? This would allow anyone who is contemplating doing a development in Ipswich to find out, quickly and simply, how much of an archaeological issue they might be facing. (3) A summary description of archaeological procedures (including flowchart(s)). Again, this would provide an accessible overview of those procedures, valuable for non-specialists. (4) A lot of the detailed description of archaeological and planning processes and stages could then go into an appendix. I believe that such a structure could produce a document which (a) was more specific to Ipswich (most of the archaeology and planning procedures are standard across England, and well-known to professionals); (b) had a shorter main text; and (c) was more accessible to the non-specialist, while still retaining the detailed advice on procedures in the appendix.	4) As noted above, the structure reflects the nature of the document as a planning document and every effort has been made to describe the situation as relevant to Ipswich.
Private individual 2	"3. p. 3 - rather than saying that archaeology 'adds costs and complexity', and can affect viability, it might be better to say that protecting Ipswich's important archaeological remains is an important aim of planning policy; if archaeological issues are fully taken into account from the very earliest stages of a development project, then any implications for the design, programme and budget of the development can be accommodated without causing disruption; difficulties	The wording has been amended to reflect this point.

Respondent	Comment	IBC response
	may arise, however, if archaeological issues not considered from the outset.	
Private individual 2	4. There are several references to waterlogged deposits. Some explanation should be included, for the benefit of non-specialists, of why they are so important (i.e. because they preserve ancient organic materials, such as wood, leather, textiles, and certain types of evidence of the past environment, which don't normally survive).	Reference to the preservation of organic materials added to 3rd paragraph of page 2.
Private individual 2	5. p. 6 – maybe say 'Appendix 3 adds a further level of clarity' (rather than 'another level of detail'). It is the clarity which is provided, rather than the detail in itself, which is important.	'Detail' has been retained, but further explanation added to clarify how the character zones relate to the Area of Archaeological Importance.
Parker Planning Services	It should be possible for outline planning applications to have conditions imposed in relation to Archaeology, rather than asking for the investigation works or surveying up front. Archaeology trial trenching and geophysical works can be very expensive indeed even more than everything else. This is particularly important to allow sites to come forward where they are not allocated and outside the settlement boundary.	The advice given in the SPD is in accordance with the National Planning Policy Framework (2018) and Ipswich Local Plan policies, and the reasons for upfront evaluation are set out in the SPD.
Parker Planning Services	With Other Authorities for outline permission where they have requested archaeology surveys, we have agreed that if the permission states "up to 100 dwellings" and in particular when layout of the site is a reserved matter and not part of the outline, it should be possible for archaeology to be conditioned.	The advice given in the SPD is in accordance with the National Planning Policy Framework (2018), which requires assessment proportionate to the significance of assets, including field evaluation where necessary. Chapter 3 of the SPD sets out that proportionate levels of assessment are determined on a case-by-case basis
Natural England	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	No amendment needed.
Historic England	We welcome its level of detail and the significant amount of Ipswich-specific information. However, our main	The text has been generally edited to make it more succinct where possible.

Respondent	Comment	IBC response
	concern is that it is readable and usable. This document is likely to be read by developers, home owners and other planning professionals, as well as archaeological professionals; and in places it is difficult for a lay reader to follow. There are three changes throughout the document which will make the document easier to read. 1. It should have an executive summary of no more than two sides which should start with the purpose of the document and how it will help developers / home owners. 2. The document uses many acronyms which only are referenced at the first point they appear in the text. It makes the text difficult to read if you are not used to the particular acronym and, if you have gone straight to a specific section you may have missed the explanation of the acronym. We recommend that most acronyms are dropped completely (for example ALGAO and PSIAH). For those that are repeated more frequently (for example Suffolk County Council Archaeology Service), they should either be not shortened (for example Historic England, Written Scheme of Investigation) or shortened to a recognisable phrases (for example the Borough Council, the Archaeology Service, the Framework) and these should be defined at the end of the Executive Summary. 3. Some technical terms are used which make certain text impenetrable for the lay reader. What are “significant horizons of archaeological remains” (page 26)? What is important about the Foxhall Road deposits (page 36)? This applies throughout the document and it should be reviewed to ensure that it is clear. Both planning and archaeological	1) ‘About this Document’ section added to the beginning to explain what it covers. 2) Acronyms removed, unless a phrase is use several times in a section, in which case it is defined the first time it appears in any given section. 3) Specific technical terms have been changed or defined, and the document generally edited with review of planning and archaeological terms and concepts in mind and clarified where necessary.

Respondent	Comment	IBC response
	terms and concepts should be reviewed.	
Historic England	We welcome the maps, photographs, illustrations and use of hyperlinks within the document. We would encourage their use wherever relevant to support the text. Given that the final document including the appendices is lengthy, we would recommend further thought into how the document will be published and used.	Further hyperlinks have been provided to facilitate web-navigation of the document, which will be primarily a web-based document. The document will also be published as a pdf file based on a Word document, so that it can be downloaded and also easily updated, but with additional hyperlinks and graphic designing to enable navigation between sections.
Historic England	We welcome the references to the National Planning Policy Framework (the Framework), however, paragraph numbers are not consistently referenced throughout the document. For those who are unfamiliar with the Framework it would be helpful if they were consistently referenced. We have picked up a couple of examples in our specific comments below. We note that these numbers are likely to change, given the draft Framework recently consulted on. If the document is published before any changes to the paragraph numbering we would like to see it in a form that is easily updatable."	References have been updated to refer to 2018 NPPF, and paragraph numbers have been added consistently where the NPPF is discussed in the text.
Historic England	1.6 The section on harm could be clearer, perhaps with examples of what substantial and less than substantial harm means in an archaeological context? The section focuses on substantial harm and designated heritage assets. The difference for non-designated assets should be explained (para 135 and 139). If paragraph numbers are being referred to it should be consistent – there is a passing reference to para 139, but a lay reader would not know. We would expect reference to significant archaeology or site adjacent to a Scheduled Monument. This section needs to include reference to para 137 of the Framework because this links through to Chapter 6.	This section is the one covering national policy and examples may add too much detail. Additional paragraphs have been added to cover non-designated assets. Section 2.4 discusses Scheduled Monuments. A sentence has been added to 1.6. Reference made to paragraph 200 of the NPPF 2018 (previously paragraph 137), and links also made to Chapter 6.

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Historic England	1.7 In the 'find out more' section we suggest including Good Practice Advice in Planning Note 3 (2015) on Managing Significance in Decision-Taking in the Historic Environment	Link added, and list of resources expanded generally.
Historic England	1.8 Scheduled Monument Consent is usually capitalised.	Capitalisation checked and amended where necessary
Historic England	2 In paragraph 3, it states that Ipswich's pre-application service covers 'all necessary consultations, including with SCCAS'. This does not make clear that an applicant may also need to consult with the County and/or with Historic England under their pre-application processes, as they are not included. Historic England's pre-application advisory service is one free cycle, not 15 hours of free advice. Information can be found here: https://historicengland.org.uk/services-skills/our-planning-services/enhanced-advisory-services/extended-pre-application-advice/	IBC pre-application service includes consultation with relevant agencies. Subsequent paragraphs set out that applicants may approach SCCAS and HE directly. Information on HE pre-application process corrected, and link added to Extended Pre Application advice service.
Historic England	Flowchart page 10 In the fourth stage the developer should prepare how to avoid and where it is not possible mitigation strategies.	'Mitigation' is intended as an overarching term to cover avoidance or recording works. For clarity, 'To preserve or record remains' added to stage 11.
Historic England	2.4 In paragraph 3 it states that "impact of development on the setting of monuments is also a consideration." It needs to be clearer that it is a planning matter that requires consultation with Historic England. In paragraph 4 we would note that all designations were reviewed and updated in 2016-7 as part of the Urban Archaeological Database work and have up-to-date mapping and descriptions In paragraph 6 it is worth restating the that nationally important archaeology that is not scheduled will be treated as if it is (para 139).	All suggestions incorporated. – reference made to NPPF footnote 63, which replaces para 139.
Historic England	3 Is chapter 3 in fact part of chapter 2 as it is information that should be gathered pre-application? If so, the sub-sections are more like an appendix. If it continues as a	Chapter 3 is intended as a standalone chapter, to follow on from what an applicant may need to provide following initial consultation about an

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	standalone chapter, the paragraphs need to be tighter and more focussed on the key steps and stages for potential applicants with some information, such as the list for desk-based assessments, possibly moved to an appendix.	application with SCC/IBC. It is intended to set out in more detail what evaluation involves if applicants are advised that it should be undertaken to support a planning application. Paragraphs have been tightened up, in accordance with advice, to set out what a survey is, and when specifically in Ipswich it may be required. The chapter sets out a suite of techniques that may be applied, and better links have been made to Appendix 4 for information about key steps and stages. For consistency, this has also been cross referenced from Chapter 5.
Historic England	4 Paragraph 2 should reiterate the basic principle that harm should be avoided. Where it is not possible to avoid the harm, then mitigation should be established. In paragraph 3 it should be noted that it is the responsibility of the planning authority to weigh the balance between harm and public benefit. It also isn't clear what is meant by "where preservation cannot be demonstrated, avoidance through design may be the best option…" If harm is avoided either by the site not being developed or by the development avoiding the archaeology, the archaeology is preserved.	A sentence has been added to clarify the principles of the NPPF. Addition made to paragraph 2 to cover the responsibility of the planning authority. Clarification has been given about the balance between mitigation through excavation and through preservation.
Historic England	4.1 In the final paragraph 'historical assets' should be 'heritage assets'. There also are a number of typographical errors in the Find Out More section. We note that the Piling advice is due to be updated.	Corrections made. The link to the piling advice can be updated in due course once the updated advice is issued.
Historic England	4.2 Paragraph 2 should be redrafted to be clearer. "…and may be a condition of planning permission, therefore only permissible in that form." Paragraph 3, should it read "will be agreed"?	The section has been rearranged for clarity. Suggested wording in relation to the condition for foundation designs added to paragraph 5. 'Will be agreed' corrected.

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	Paragraph 4 is confusing. It may be worth stating that the pre-commencement condition will be in two stages, then specify the stages.	As noted above, the section has been rearranged to clarify the use of staged conditions.
Historic England	4.3 Typographical error in second set of bullet points.	Corrected
Historic England	5.3 What are “significant horizons of archaeological remains”?	Amended to ‘complex and layered’
Historic England	Chapter 6 needs to reference para 137 as this is the policy that underpins the chapter. There is a typographical error in paragraph 3 ‘response positively’. In paragraph 5 would it be clearer to say “seeing proposals, objections and excavations”?	References to NPPF added, typos corrected. Objections corrected to objects…
Historic England	App1 Section 2 The section on Palaeolithic and Mesolithic is a technical description. The accessibility to information can be improved.	Definition of some technical terms has been added where not previously included.
Historic England	App 1 Section 3 Where it says ‘are heavily biased towards’, do you mean ‘more likely to be found’? The table at the end of this section is clear and useful.	This has been re-phrased.
Historic England	App 5 There is a balance between the length of the document and clarity, but the appendices may benefit from starting at the top of a page. Appendix 5 could also benefit from a short introduction.	Short introduction added. It is the intention that appendices and chapters will start at the top of a page.
Historic England	App 8 The box ‘submit application without consultation’ with an arrow up to Question 1 does not make sense. If the site doesn’t have a scheduled monument and doesn’t have archaeological potential then you would submit an application without consultation. Therefore it is an arrow out of the No for Question 3.	The box was meant to convey that an applicant may submit an application without consultation, and so not realise that a site is a scheduled monument or has potential. Amended for clarity to: ‘If an applicant submits an application without consultation, the process of reviewing the application would occur at a later stage in the planning process...’
Historic England	App 10 Conservation Areas are designated heritage assets.	Added
Suffolk Preservation Society	SPS welcomes the Supplementary Planning Document for Ipswich which should ensure that the significance of Ipswich’s important archaeological resource is fully understood, conserved and promoted through the planning system. SPS considers that	The text has been made more succinct where possible, without changing the sense of the document as it has been consulted on.

Respondent	Comment	IBC response
	the document is very informative and clearly written although it could perhaps be more succinct) and it should greatly assist planners, developers and archaeological contractors in the decision-making process and the stages in the archaeological process. Dr Jess Tipper MA PHD Cantab FSA has thoroughly reviewed the document on behalf of SPS and has made the following observations in respect of the draft SPD: 1. There should be reference in the document/link to the CIFA Standards and Guidance document for archaeological advice by historic environment services (2014). 2. There is some inconsistency in the use of SCCAS and SCC throughout the document – both terms are used throughout the report. SCCAS should be used throughout the SPD (but not both).	Subheadings and bullet points have been added to some sections. 1) The link is in the 'Find out more' box of Chapter 2. 2) Abbreviations/acronyms have generally been removed from the document, or defined at the beginning of each section where they are used. Inconsistencies in the use of SCC/SCCAS have been corrected.
Suffolk Preservation Society	In addition, the following detailed points refer to sections which require clarification and/or revision: p.3. Last paragraph of Section 1.3 (Development and archaeology). Early consideration can establish the feasibility of development and ensure that layout and appropriate foundation designs are agreed at an early stage, to minimize the impact on archaeological remains (thereby reducing costs).	1.3 last paragraph amended to reflect this (although costs not mentioned as alternative foundation schemes can have their own costs).
Suffolk Preservation Society	p.4. NPPF. Reference to the 'polluter pays' principle should be deleted. It is not a term used in the Valetta Convention and (I think) is contra the language of the NPPF. The first paragraph of this section should be deleted or moved as it relates to the Valetta Convention and not the NPPF.	Paragraph headings moved. 'Polluter pays' was left in from earlier text about PPG 16 and has been removed.
Suffolk Preservation Society	p.9 top of page. There is some inconsistency here. SCC (should be SCCAS) charges on a part cost (why part?) recovery basis and this contradicts p.8 where it is stated that SCCAS 'offers free pre-application advice'.	Text clarified and further information added in the 'find out more' box.

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Suffolk Preservation Society	p.16. 2nd paragraph (3. Information to support a planning application). Field evaluation will also help to inform the appropriate layout and foundation design, to minimize impact on below-ground archaeological remains.	Sentence added to second paragraph of section 3.
Suffolk Preservation Society	p.16. Base of page. The DBA should be undertaken by an archaeological contractor/consultant.	Consultant added to existing sentence, moved to the 'find out more' box.
Suffolk Preservation Society	p.17. Add LIDAR to the list of topics for desk-based assessment.	Added
Suffolk Preservation Society	p.18. Geophysical survey (and consideration of crop regimes) is only appropriate for greenfield sites on the margin of the Borough. This should be clarified.	First sentence of the paragraph states that it is for greenfield sites. Clarification added to crop comment.
Suffolk Preservation Society	p.18. Figure 10. This is an image of geophysical survey from Exning (West Suffolk) and it is not relevant to Ipswich. If there is no appropriate example for Ipswich, the figure should be deleted.	It is useful to have an illustration of a figure – the relevance is what it shows.
Suffolk Preservation Society	p.18 3.5 Archaeological Evaluation. The title should be amended (to Archaeological Test Pit or Trial-trenched Evaluation) as, strictly, geophysical survey, fieldwalking, earthwork survey, etc. are also archaeological evaluation (techniques).	Amendment made.
Suffolk Preservation Society	p.19. 'Evaluation may involve considerable excavation of complex deposits'. Test pit or trial trenched evaluation should be sufficient (and no more, i.e. a proportionate) to establish the significance of the heritage asset.	The point was intended to convey more that the work may take time – sentence amended.
Suffolk Preservation Society	p.20. What is the criteria for assessing and/or recording standing buildings (i.e. why and when is an assessment requested)?	Clarification made
Suffolk Preservation Society	p.21. 4. Planning Decisions. It should be clarified that SCCAS is an external consultee to the LPA and provides advice to the LPA (i.e. decisions are made by the LPA on the specialist advice of SCCAS – and not by SCCAS).	This is set out in Section 2. Amendment made to note that SCC are specialist consultees to IBC.
Suffolk Preservation Society	p.22. Reference should be made in the text to Historic England's guidance on 'Piling and Archaeology' (2016) and the term 'acceptable loss' (rather	It is the content of the Herefordshire quote which is relevant and it clearly illustrates

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	than quoting Herefordshire's SPD – which is not relevant to Ipswich).	a point. HE guidance is referred to in the 'find out more' box.
Suffolk Preservation Society	p.22-3. Recording should not be equated to 'sacrificed' and this should be amended to the term 'mitigated'. There is national guidance relating to piling and archaeology (including piling and burials). Historic England's 'Piling and Archaeology' (2016) and Preserving Archaeological Remain' (2017) provides clear guidance and these should be referred to in terms of 'balanced judgement'.	'Sacrificed' removed. HE guidance is referred to in the 'find out more' box.
Suffolk Preservation Society	p.23. Find out more. Typo – insert space between London and Historic.	Amended
Suffolk Preservation Society	p.24. 4.2 Planning conditions and obligations. First paragraph – delete word 'hopefully' – there is a need to ensure prompt analysis and reporting and a timetable must be agreed with the LPA; this has been a significant failure in Ipswich over the last 40 years and the analysis and reporting of many important archaeological projects has not been completed.	'Hopefully' deleted Reference made to timely analysis and reporting.
Suffolk Preservation Society	p.24. 4.2 Planning obligations. . These need to be secured in the pre-application discussions prior to granting of consent. What is the mechanism for doing this? Reference should be made to the Ipswich Policy/SPD for heritage contributions. Art and design projects cannot be secured through S106 obligations (as far as I am aware) and this should be deleted.	Planning obligations cannot be secured at pre-application stage. However, they can be identified as part of written responses. Art and design projects could be secured through section 106 provided they complied with the tests set out in the Planning Practice Guidance. Ipswich does not have a policy or SPD specifically about heritage contributions.
Suffolk Preservation Society	p.26. 5.2 Mitigation – preservation in situ. 'These decisions may be made as a site progresses'. How can this (foundation design) be secured once consent has been granted? There should be a condition attached to the consent relating to approval of an acceptable foundation design and impact on archaeological remains.	The paragraph is intended to ensure that excavation strategies can be modified if the developer can prove that damaged will be minimised as a project progresses. Re-worded to clarify this.
Suffolk Preservation Society	p.26. 5.3 Mitigation – excavation. Third paragraph – change 'highly expensive' to 'very expensive'.	Simplified to read 'expensive'.
Suffolk Preservation Society	p.28. 5.4 Mitigation - monitoring. The discovery of unexpected complex remains, and the need for a change of	Paragraph amended. Despite proper evaluation/assessment, unexpected remains can be

Respondent	Comment	IBC response
	strategy, should be wholly exceptional if a project has been properly evaluated and the significance of archaeological remains is properly understood.	encountered and the reference in the SPD is to flag that there may need to be contingency provision to deal with them.
Suffolk Preservation Society	p.29. 5.7 Unexpected remains. Likewise, the discovery of unexpected remains should be wholly exceptional if a project has been properly evaluated.	Paragraph amended. Despite proper evaluation/assessment, unexpected remains can be encountered: evaluation provides a model of a site and a best guess as to what is there, but the SPD flags for the developer that there is potential for something unexpected.
Suffolk Preservation Society	p.29. 5.8 Publication and Reporting. It would be helpful to provide the meaning of OASIS and more information behind this requirement (and link to the website).	Link added and Acronym spelt out.
Suffolk Preservation Society	p.30. The need for publication needs to be based on/justified by the results of the post-excavation assessment.	Sentence added.
Suffolk Preservation Society	p.30. Archiving. As far as I am aware, Colchester and Ipswich Museums Service (CIMS) is the main repository for archaeological projects in Ipswich Borough (not SCC). This needs to be checked and amended (if incorrect).	By agreement, Suffolk County Council is now the main repository for new development-funded archaeological projects in IBC, rather than CIMS.
Suffolk Preservation Society	p.30. Selection and retention criteria should be agreed well in advance of the point of deposition. This needs to be clarified.	Amended.
Suffolk Preservation Society	p.30. Reference must be made to digital archive deposition/curation with an accredited/trusted digital archive repository (neither SCC nor CIMS are accredited digital archive repositories).	Sentence added.
Suffolk Preservation Society	p.31. Discharge of conditions, 2nd para. Discharge of the second condition ‘will occur’.	Amended.
Suffolk Preservation Society	p.32. Direct access for local people on excavations, while desirable, is often impossible on urban developments (due to health and safety constraints). Other ways of promoting discoveries is often more realistic (and can include viewing galleries/windows from the edge of the site).	Viewing galleries and windows added to text.
Suffolk Preservation Society	p.32. para. 4. Typo. ‘Objections’ should be ‘objects’.	Amended.

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Suffolk Preservation Society	p.32. S106 obligations. These need to be secured in the pre-application discussions prior to granting of consent. Again, reference should be made to the Ipswich Policy/SPD for heritage contributions.	Planning obligations cannot be secured at pre-application stage. However, they can be identified as part of written responses. Art and design projects could be secured through section 106 provided they complied with the tests set out in the Planning Practice Guidance. Ipswich does not have a policy or SPD specifically about heritage contributions.

In addition, developers and landowners with development sites in Ipswich known to contain archaeology (and their agents) were invited to attend a developers' workshop on 4th July 2018, to disseminate and discuss the draft SPD and gather feedback about its scope and content. Thirteen people attended the workshop, excluding IBC planning staff.

Key points discussed at the workshop included the following:

- The dynamic nature of the Urban Archaeological Database (UAD) and the importance of archaeological reports being completed and published, to enable the database to be updated on a rolling basis.
- Encouraging applicants to speak to either Ipswich Borough Council or Suffolk County Council Archaeology Service at pre-application stage, the key advice in the SPD being to seek advice early on to reduce risks to the subsequent stages of the development process.
- How development viability and timescales can be taken into account, for example in discharging conditions – again the SPD and UAD will help to 'de-risk' the process. Conditions can be tailored to the relevant stage and discharged at different rates. The need to agree pre-commencement conditions is another reason to start dialogue early.
- A request to make the SPD as interactive as possible and easy to navigate. The final version of the SPD proposed for adoption has been edited where possible and the Council's Design Team have designed it in such a way as to clearly demarcate sections and aid navigation between them in the web-based version of the document.

<u>Call for ideas on the proposed Development and Archaeology SPD, June 2017</u>

This section of the consultation statement was reported to the Council's Executive on 6th March 2018 as Appendix 2 to report E/17/68. It is included here for completeness.

In June 2017, the Council published a Call for Ideas on the Development and Archaeology SPD. The consultation was carried out under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The call for ideas was issued through a Local Plan Newsletter available on the Council's web site and posted to everyone on the Local Plan database. A period of six weeks was allowed for comments to be submitted, between 14th June and 26th July 2017.

The comments received are shown below together with the Council's response.

Table 2 Comments received in response to the 'Call for ideas'

Section	Respondent	Comment	Council Response
N/A	Historic England	We welcome the production of the supplementary planning guidance, drawing on the urban archaeology database work that has been undertaken by the County Council, to further enhance knowledge of archaeology within Ipswich, particularly in those areas which have been identified for further development. We would expect the SPD to help explain how archaeology forms part of the wider historic environment of Ipswich and, in particular, how it relates to other historic structures and areas, whether designated or not. We would recommend consideration of and reference to our advice notes on the historic environment. Specifically: • Preserving Archaeological Remains • Understanding Place: Historic Area Assessments • Good Practice Advice in Planning 2 – managing significance in decision-taking in the historic environment • Good Practice Advice in Planning 3 – the setting of heritage assets	The document will be a supplementary planning document as defined by the Planning and Compulsory Purchase Act 2004. Support for its preparation is welcomed. This is covered in Chapter 1 of the draft SPD, which describes the archaeology of Ipswich and provides the policy context for planning and archaeology. A link is provided to all the guidance and advice notes from Historic England in Chapter 1.

		Once you have collated the responses from the call for ideas we would be happy to provide further specific advice on the development of the SPD.	The draft SPD has been shared with Historic England during its preparation.
N/A	Suffolk County Council	The document will support the achievement of objectives in the Local Plan, specifically the conservation and enhancement of historic assets (objective 8). Policy DM8 establishes a clear framework, including for preservation in situ, but further guidance is necessary in Ipswich. It should provide the following for developers, planners, and other stakeholders: • More detailed information about the context of policies in the Local Plan, through: o text on the history of archaeological investigation in Ipswich; o up-to-date interpretations of the development of the town from its origins, and o text that highlights the national and international significance of the archaeological record of the town. • Clear information on the processes for management of designated and undesignated archaeological sites in the delivery of policies in the Local Plan and the NPPF, from pre-application assessment through to the archiving and publication of the results of archaeological projects.	The draft SPD covers these points as follows Appendix 1 Chapter 1 and Appendix 1. Chapter 1 and Appendix 1. This is provided in the main body of the SPD and in the appendices, for example Chapter 6 deals with the enhancing public understanding through the appropriate archiving of information. The SPD provides a link to the site sheets in the Local

		• Further and more enhanced information on sites allocated in the local plan, outlining the results of archaeological evaluations where these have been undertaken, and providing information on site-specific constraints and opportunities. • Notes on complexities and considerations for preservation in situ, with examples of how such preservation can be achieved. • Maps that complement and refine the Area of Archaeological Importance outlined in the local plan through more detailed zone mapping of archaeological character and sensitivity. This may include, for example, informative refinements detailing areas of prior damage and no constraint, or areas where highly sensitive waterlogged deposits may be anticipated, and areas of remains of different dates. • Summaries of research potential for future development-led work. • Present links to sources of information about the town's archaeology.	Plan for key sites known to have high archaeological potential, and adds additional information where it exists (Appendix 3). Chapters 4 and 5 address preservation in situ as one of a range of mitigation measures. A 'key' map is provided in Chapter 1 with supporting detailed in Appendix 3 - these provide an additional layer of detail to the Area of Archaeological Importance defined through the Local Plan. This is addressed in Appendix 6 Links will be incorporated into the final version of the document, which will be a web-based tool as well as a printed document.