

**Comments Received during the SA/SEA Scoping Report Consultation Period
March / April 2006**

Comments were received from 7 people / organisations on the published consultation version of the IBC SA/SEA Scoping Report in Spring 2006. This appendix sets out the comments from all respondents. Three of the four statutory consultees have responded with English Heritage being the exception. Their comments continue to be pursued.

The 7 respondents were:

Amy Lesley	SEA Officer	Suffolk County Council
Colin Bambury	Planning Manager	Highways Agency
Graham King	Senior Countryside Officer	Countryside Agency*
No name given	No position given	Andrew Martin Associates
David Barker	Senior Planner	Barton Willmore
Andrew Hunter	Development Planning Officer	Environment Agency*
Darren Kidney	Assistant Conservation Officer	English Nature*

* indicates one of the four statutory consultees. Still awaiting reply from English Heritage.

**Table of Comments Receive During the Consultation Period
(March – April 2006) on the SA/SEA Scoping Report**

Respondent	Section	Comment
Amy Lesley SEA Officer Suffolk County Council	General	The scoping report is generally a good document; it seems to cover all the relevant issues for Ipswich. The report also lays out the basis for assessment satisfactorily. However, a full list of policies, plans and programmes that were scoped during the scoping process would have made the document more complete, and although you say the appendix of the full scoping document list is available on request, having a basic knowledge of what had been done would have been a helpful inclusion. The document is also missing a bibliography or reference list. The acknowledgement of the background work SSAG has done for the SA/SEA process is appreciated.
Colin Bambury Planning Manager Highways		No Comments.
Graham King Senior Countryside Officer Countryside Agency	<p>Review of Relevant Plans, Policies and Programmes</p> <p>Baseline Information</p> <p>Significant Issues</p> <p>Sustainability Appraisal Framework</p>	<p>We have read the draft Scoping Report with interest and, in general, we are satisfied that the Sustainability Appraisal of the LDF is proceeding in a proper, logical and comprehensive manner. Since the Borough is overwhelming urban in nature, we have relatively few comments to offer. These are set out below:</p> <p>The co-operative approach of the Suffolk local authorities working through the Suffolk Sustainability Appraisal Group (SSAG) to review the context for appraisals in the County is a very sensible one. Appendix A contains an extensive range of plans, policies and programmes and we can identify no obvious omissions.</p> <p>Concerned about the apparent lack of analysis for more than a few of the documents listed, especially the more local ones.</p> <p>One other concern relates to the using of a shared and pre-prepared resource such as that provided by SSAG is that it can become out of date very quickly. We note that two PPS's in Appendix A have 'Update this' noted against them but that is all. Another example of the constantly developing nature of the policy context would be the very recent publication of the UK Climate Change Programme 2006. While this could not have been included in this scoping report, its content will need to be reviewed and compared with the earlier (2000) Programme which is included in Appendix A and any necessary amendments made.</p> <p>We note that data on the areas of and access to open space is stated to be not yet available. We hope that this will soon be remedied.</p> <p>Table 7 sets out a challenging list of key issues. However, it should be qualified as 'work in progress' rather than as a definitive list. The list of topics in paragraph 2.3.2 where data is lacking in some way is extensive. As and when data becomes available, this may give rise to specific issues which will need to be addressed.</p> <p>Overall, we feel that the proposed sustainability framework with the objectives and assessment criteria set out in Appendix C should enable a thorough appraisal of the LDF.</p> <p>We welcome the inclusion of Objective 10 relating to landscape and the associated assessment criteria.</p> <p>For Objective 13, the proposed criterion "<i>improve existing outdoor play space provision?</i>" is not sufficient. This is the only reference</p>

Respondent	Section	Comment
		to open space provision in the whole assessment framework. We would want to see an additional assessment criterion against this objective such as <i>“Will it provide additional leisure facilities, green spaces and improve access to existing facilities and the wider countryside including opportunities for people to come into contact with and appreciate wildlife and wild places (including woodlands, parks)?”</i>
Andrew Martin Associates	General	The SA Assessment sheets at Appendix C do not take into account all proposed changes set out in Appendix D ‘Responses to Consultation’ on SEA Objectives and Indicators. This relates to AMA’s previous comments on Objectives 19 and 20. <i>Amendments need to be made for consistency.</i>
David Barker Senior Planner Barton Willmore	Appendix C	<p>Question 2.1 does not take into account the development needs of Ipswich Borough which include providing housing to meet RSS14 requirements. In Ipswich....we consider that to include Question 2.1 as drafted would restrict the flexibility of local planning policy to provide housing. We propose that Question 2.1 is changed to acknowledge that Greenfield land should be at an appropriate density to ensure the land is used in a sustainable manner.</p> <p>Question 2.1 on the SA Assessment Sheet should be changed to: <i>“ensure that the loss of Greenfield land is minimised by developing Greenfield sites at an appropriate density”.</i></p> <p>Similarly for the following:</p> <p>Question 2.2 should be changed to <i>“develop the best and most versatile agricultural land at sustainable densities to minimise the loss of land to development”.</i></p> <p>Question 16.2 should be reworded to state: <i>“identify sites to deliver housing in the RSS plan period.”</i></p> <p>Question 16.5 should be deleted from the SA assessment Sheets as it does not clearly relate to Objective 16.</p> <p>Question 16.6 should be deleted from the SA Assessment Sheets as it does not clearly relate to Objective 16.</p>
Andrew Hunter Development Planning Officer Environment Agency	Relevant Plans, Policies and Programmes Environmental Information Sustainability Appraisal Framework	<p>These documents should be added to the list:</p> <p>Planning Response to Climate Change: Advice on Better Practice (ODPM, 2004) Adapting to Climate Change: A Checklist for Development (Three Regions Climate Change Group, Consultation – February 2005) Draft PPS25 – Development and Flood Risk</p> <p>Need to clarify confusion between Flood Zone Maps and Flood Maps, the former being the most appropriate for planning purposes.</p> <p>Reword Biodiversity Objective to read: <i>‘To protect, maintain and enhance the diversity and abundance of species and their habitats to implement a net gain and to avoid habitat fragmentation’.</i></p>
Darren Kidney Assistant Conservation Officer English Nature	Para 2.4.20	<p>The heading for this section should be amended to ‘Landscape, Biodiversity and Geodiversity’.</p> <p>Ipswich Borough contains, either entirely or partially, three SSSIs: Orwell Estuary (a component of the Stour & Orwell Estuaries SPA and RAMSAR site); Stoke Tunnel Cutting SSSI; Bixley Heath SSSI.</p>

Respondent	Section	Comment
	Table 7	English Nature recommends that the following be added under the 'Environmental' heading: ' Maintaining and enhancing biodiversity and geodiversity within designated sites and the wider countryside'.
	Para 3.1.5	English Nature recommends that the heading 'Biodiversity, fauna and flora' should be amended as follows: Biodiversity and Geodiversity To conserve and enhance biodiversity and geodiversity. The SA Objective 'To protect and enhance favourable conditions on SSSIs, SPAs and SACs' should be placed under the 'Biodiversity and Geodiversity' heading where it will be more relevant (however, see comments for Appendix B).
	Table 8 Compatibility of SA Objectives	Objective 8 and Objective 11 are listed within the table as having no direct link with Objective 13. In English natures opinion, the relationship between Objectives 8 and 11 with 13 is likely to be compatible due to the significant positive contribution biodiversity can make in terms of health, quality of life and educational and access opportunities for the local community. Objective 8 should be amended to: 'To conserve and enhance biodiversity and geodiversity' consistent with para 3.1.5 (see above).
	B5 Mitigating Adverse Effects	English Nature supports the statement given here but wishes to highlight that alternative solutions should be considered first if the preferred options are likely to have significant sustainability and/or environmental effects. Mitigation measures should only be considered if there is no satisfactory alternative.
	Appendix B	Several amendments to the wording of indicators under the SA Objectives 8 and 11: and references to data sources are provided. The Council may wish to consider combining Objectives 8 and 11 due to the similarity in terms of their SEA indicators and their compatibility with the other SA Objectives in Table 8. For example, the second SEA Indicator for Objective 11, relating to the condition of SPAs and SACs could be incorporated within the indicator list for Objective 8 (see amendments offered).