

# **Representations on the Draft Ipswich Borough Council Local Validation List and the Council's Response**



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Public consultation on the draft Ipswich Borough Council Local Validation List 2023 was carried out between 19 October 2022 and 30 November 2022 (a period of six weeks).

Representations on the draft Ipswich Borough Council Local Validation List were received from:

- One private individual
- Suffolk County Council
- Suffolk Chamber of Commerce
- Suffolk Constabulary
- Suffolk Wildlife Trust
- Natural England, and
- Internal Consultees

The representations are reproduced below and the Council's response provided to those points directly relating to the draft Ipswich Borough Council Local Validation List. The commentary also indicates where the draft Ipswich Borough Council Local Validation List has been revised to respond to comments as appropriate. Respondents are thanked for their input.

## Ipswich Borough Council Draft Local Validation List 2023

**NB:** Modification are expressed in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text.

### External Consultation Responses

Respondent	Consultation Response	IBC Response / Modification
Private Individual	<p><u>Ownership Certificates and Agricultural Land Declaration</u> - Page 6 is wrong in stating that ownership certificates are required for all types of applications. Advertisement consent applications do not require a certificate of ownership (or, for that matter, even a declaration that the owner consents to the application - this is not statutorily required since it is covered by the Standard Conditions in the Control of Advertisements Regulations).</p>	<p>New text has been added to the ‘Ownership Certificates and Agricultural Land Declaration’ item to clarify that Ownership Certificates are not required for advertisement consent, applications for the approval of reserved matters, removal or variation of conditions and consent to work on a tree subject to a Tree Preservation Order. Cross reference has been added to the ‘Advertisement Details’ item to help users navigate the document.</p> <p>Inserted new text under the ‘Ownership Certificates and Agricultural Land Declaration’ item –</p> <p><u><i>An Ownership Certificate is not required for applications for the approval of reserved matters, removal or variation of conditions, consent to work on a tree subject to a Tree Preservation Order (TPO) and advertisement consent. For more information on what is required to support advertisement consent applications please see ‘Advertisement Details (for advertisements requiring express consent)’.</i></u></p>

<p>Suffolk Chamber of Commerce</p>	<p><u>Economic Impact Assessment</u> - There should be an additional requirement for major commercial developments (office, retail and industrial developments involving 1000 square metres or more of floorspace or where site area is 1 hectare or over.). The additional requirement proposed is an economic impact assessment or statement. The assessment should forecast how many jobs might be created or lost (i.e. net jobs) as a result of the proposed development and provide details of the type of jobs that might be created or lost. The assessment should indicate if and how employment opportunities, skills and training will be provided during and/or after construction for local residents. The assessment should indicate if and how supply chain opportunities will be provided during and/or after construction for local businesses. The assessment will enable local businesses, residents, training providers and business support and economic development bodies to identify the impact of a proposed major commercial development and plan accordingly. The Chamber appreciates that the council may decide to revise the proposed wording of this requirement if it is included in the new validation list, to make sure that it conforms with policy and legislation.</p>	<p>The NPPF, paragraph 81, requires that “significant weight should be placed on the need to support economic growth and productivity”. Ipswich is a key economic driver of the Ipswich Strategic Planning Area (ISPA) within the Suffolk Economy. The adopted Ipswich Local Plan 2018-2036 states that the Council will promote sustainable economic growth in the ISPA, with a focus on jobs within the Borough. It is agreed that Economic Impact Assessments should be required to support certain types of planning proposals, to help determine the economic and jobs growth that could be achieved.</p> <p>New validation requirement inserted as follows -</p> <p><b><u>Economic Impact Assessment</u></b></p> <p><b><u>When is this required?</u></b></p> <p><u>Required for the following types of application/development:</u></p> <ul style="list-style-type: none"> <li>• <u>All major planning applications involving the loss of land or buildings in employment uses (Use Class E(g), B2 General Industry or B8 Storage and Distribution, as defined by the Use Classes Order 1987 (as amended)).</u></li> <li>• <u>All major planning applications involving the delivery of new employment uses.</u></li> </ul>
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<p>Suffolk County Council Lead Local Flood Authority</p>	<p><u>Sustainable Drainage Strategy</u> - Can we include the word 'sustainable' before the title Drainage Strategy in left hand column, water is a resource and should be treated as such. Currently it is often considered a waste product and this needs to be reflected in the wording of the list.</p>	<p>The Council agrees that water should be regarded as a sustainable resource. To reflect this, the Local Validation List entry now reads '<u>Sustainable Drainage Strategy</u>'.</p>
<p>Suffolk County Council Lead Local Flood Authority</p>	<p><u>Sustainable Drainage Strategy</u> - Suffolk Flood Risk Management Strategy (SFRMS); the strategy is currently being revised and due for issue imminently along with the supporting guidance re the Suffolk standards for sustainable drainage (SuDS) included within Appendix A of the main strategy document.</p>	<p>The Suffolk Flood Risk Management Strategy is the main document which outlines how the Suffolk Flood Risk Management Partnership will manage flood risk in Suffolk. It is important that the Local Validation List includes links to the most up-to-date policy documents and guidance.</p> <p>The suggested reference has been added to the 'Sustainable Drainage Strategy' entry as follows (a link will be provided as soon as it becomes available) –</p> <p><u><i>Suffolk Local Flood Risk Management Strategy - TBC</i></u></p>
<p>Suffolk County Council Lead Local Flood Authority</p>	<p><u>Sustainable Drainage Strategy</u> - Appendix A – The local SuDS Guide should be specifically mentioned in the 'sources of further information section' as it is the critical piece of guidance with respect to the design and implementation of SuDS. Link as follows; <a href="https://www.suffolk.gov.uk/asset-library/imported/2018-10-01-sfrms-suds-guidance-appendix-a.pdf">https://www.suffolk.gov.uk/asset-library/imported/2018-10-01-sfrms-suds-guidance-appendix-a.pdf</a></p>	<p>The Local SUDS Guide sets the local standards for Suffolk and, together with National Planning Policy, strongly promotes developers to use SuDS to reduce surface water runoff and mitigate flood risk.</p> <p>The suggested reference text has been added to the 'Sustainable Drainage Strategy' entry as follows –</p>

		<p><u><i>Sustainable Drainage Systems (SuDS) a Local Design Guide Appendix A to the Suffolk Flood Risk Management Strategy -</i></u>  <a href="https://www.suffolk.gov.uk/asset-library/imported/2018-10-01-sfrms-suds-guidance-appendix-a.pdf">https://www.suffolk.gov.uk/asset-library/imported/2018-10-01-sfrms-suds-guidance-appendix-a.pdf</a></p>
Suffolk County Council Lead Local Flood Authority	<p><u>Sustainable Drainage Strategy</u> - DEFRA's Non-statutory technical standards for SuDS should also be specifically referenced in the 'sources of further information' section  <a href="https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards">https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards</a></p>	<p>The document contains non-statutory technical standards for the design, maintenance and operation of sustainable drainage systems. Systems to drain surface water from housing, non-residential or mixed-use developments for the lifetime of the developments.</p> <p>The suggested reference text has been added to the 'Sustainable Drainage Strategy' entry as follows –</p> <p><u><i>Sustainable Drainage Systems - Non-statutory technical standards for sustainable drainage systems March 2015 -</i></u>  <a href="https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards">https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards</a></p>
Suffolk County Council Lead Local Flood Authority	<p><u>Sustainable Drainage Strategy</u> - The CIRIA SuDS Manual should also be referenced  <a href="https://www.ciria.org/ItemDetail?iProductCode=C753F&amp;Category=FREEPUBS">https://www.ciria.org/ItemDetail?iProductCode=C753F&amp;Category=FREEPUBS</a></p>	<p>The SuDS manual published in 2007, is highly regarded and considered one of CIRIA's most influential areas of work.</p> <p>The suggested reference text has been added to the 'Sustainable Drainage Strategy' entry as follows –</p>

		<p><u><i>The SuDS Manual 2007 - <a href="https://www.ciria.org/ItemDetail?iProductCode=C753F&amp;Category=FREEPUBS">https://www.ciria.org/ItemDetail?iProductCode=C753F&amp;Category=FREEPUBS</a></i></u></p>
<p>Suffolk County Council Lead Local Flood Authority</p>	<p><u>Sustainable Drainage Strategy</u> - Under ‘what is required’, SCC LLFA have a table (in Appendix A to the SFRMS document) outlining what is required at each stage of the planning process. This has been included following this table for your information, but it does not necessarily need to be included in the validation list. At the very minimum I would suggest that the following items be included however:</p> <ul style="list-style-type: none"> <li>• Drainage Strategy including details of how the proposed drainage strategy will deliver on each of the four pillars of SuDS</li> <li>• Site Investigation Report</li> <li>• Dimensioned Layout Drawings (which must show existing watercourses and drainage features alongside the proposed SuDS features)</li> <li>• Supporting Hydraulic Calculations</li> <li>• Maintenance &amp; Management Plan</li> </ul> <p>Contact details should be as follows: floods@suffolk.gov.uk rather than a telephone number and the website address as follows: <u><a href="https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/">https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/</a></u>.</p> <p>The EA no longer provide specific guidance with respect to surface water drainage and SuDS with the LLFA fulfilling this role.</p>	<p>New text has been added to the ‘Sustainable Drainage Strategy’, entry under the heading ‘what is required’ to reflect the minimum items which need to be included at each stage of the planning process.</p> <p>The contact details for Suffolk County Council Floods team have been updated for accuracy. Reference to the Environment Agencies website has been removed to reflect the fact that they no longer provide specific guidance with respect to surface water drainage and SuDS, with the Lead Local Flood Authority (LLFA) now fulfilling this role.</p> <p>The ‘Sustainable Drainage Strategy’ entry has been updated as follows –</p> <p><u><i>The Suffolk Local Flood Risk Management Strategy (Appendix A) outline what is required at each stage of the planning process, including:</i></u></p> <ul style="list-style-type: none"> <li>• <u><i>Drainage Strategy including details of how the proposed drainage strategy will deliver on each of the four pillars of SuDS</i></u></li> <li>• <u><i>Site Investigation Report</i></u></li> <li>• <u><i>Dimensioned Layout Drawings (which must show existing watercourses and drainage</i></u></li> </ul>

		<p><u>features alongside the proposed SuDS features)</u></p> <ul style="list-style-type: none"><li>• <u>Supporting Hydraulic Calculations</u></li><li>• <u>Maintenance &amp; Management Plan</u></li></ul> <p><del>The Suffolk Local Flood Risk Management Strategy can provide developers some context into flood management for Suffolk on a larger scale, including links to and extracts from key national guidance documents. Please contact the Council's Drainage Engineering Team on tel. 01473 432854 or the Environment Agency website for further information.</del></p> <p><u>Please contact floods@suffolk.gov.uk or visit <a href="https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/">https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/</a></u></p>
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<p>Suffolk County Council Lead Local Flood Authority</p>	<p><u>Site Specific Flood Risk Assessment (including Exception Test) -</u> The Ipswich Surface Water Management Plan should be specifically mentioned in the 'sources of further information section', <a href="https://www.greensuffolk.org/app/uploads/2021/05/Ipswich-Flood-Risk-Management-Strategy-SUMMARY.pdf">https://www.greensuffolk.org/app/uploads/2021/05/Ipswich-Flood-Risk-Management-Strategy-SUMMARY.pdf</a> and <a href="https://www.greensuffolk.org/app/uploads/2021/05/Ipswich-Flood-Risk-Management-Strategy-v12.pdf">https://www.greensuffolk.org/app/uploads/2021/05/Ipswich-Flood-Risk-Management-Strategy-v12.pdf</a></p> <p>The link to the Ipswich SFRA is now available at <a href="https://www.ipswich.gov.uk/content/the-ipswich-strategic-flood-risk-assessment-sfra">https://www.ipswich.gov.uk/content/the-ipswich-strategic-flood-risk-assessment-sfra</a>, link in validation list does not work.</p> <p>The link to the climate change allowances has been superseded by <a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</a></p>	<p>The suggested reference texts have been updated/added for accuracy and completeness to the 'Site Specific Flood Risk Assessment (including Exception Test)' entry as follows -</p> <p><i><u>Producing a Surface Water Management Plan for Ipswich -</u></i> <a href="https://www.greensuffolk.org/app/uploads/2021/05/Ipswich-Flood-Risk-Management-Strategy-SUMMARY.pdf">https://www.greensuffolk.org/app/uploads/2021/05/Ipswich-Flood-Risk-Management-Strategy-SUMMARY.pdf</a></p> <p><i><u>Ipswich Surface Water Management Plan Phase 3 Report May 2012 -</u></i> <a href="https://www.greensuffolk.org/app/uploads/2021/05/Ipswich-Flood-Risk-Management-Strategy-v12.pdf">https://www.greensuffolk.org/app/uploads/2021/05/Ipswich-Flood-Risk-Management-Strategy-v12.pdf</a></p> <p><i><u>Ipswich Strategic Flood Risk Assessment 2020, includes local flood maps and watercourses -</u></i> <a href="https://www.ipswich.gov.uk/content/the-ipswich-strategic-flood-risk-assessment-sfra">https://www.ipswich.gov.uk/content/the-ipswich-strategic-flood-risk-assessment-sfra</a> <a href="https://www.ipswich.gov.uk/content/strategic-flood-risk-assessment-sfra">https://www.ipswich.gov.uk/content/strategic-flood-risk-assessment-sfra</a></p> <p>Climate change allowances - <a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances.</a> <a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</a></p>
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Suffolk County Council	<p><u>Design and Access Statement</u> -</p> <p>It is suggested that the Suffolk Design: For Streets guide is also under “sources of further information and support” in this section. This guide was formally adopted by Suffolk County Council cabinet on 26th July 2022 and it is now the principles for how highways and transport assess review planning applications as statutory consultees.</p> <p><a href="https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas/">https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas/</a></p>	<p>The Suffolk Design: For Streets guide was published in 2022 and is a material consideration in the determination of planning application.</p> <p>The ‘Design and Access Statement’ entry, ‘Sources of further information and support’ has been updated as follows –</p> <p><i>Suffolk Design Guide for Streets –</i>  <a href="https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas/">https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas/</a></p>
Suffolk County Council	<p><u>Biodiversity Gain Plan</u> -</p> <p>The Requirements for the biodiversity net gain plan in the validation list are supported. It is suggested that the first bullet point in the list is amended to include the full mitigation hierarchy: “How adverse impacts on habitats have been minimised, mitigated, and compensated for.”</p>	<p>Biodiversity net gain complements and works with the biodiversity mitigation hierarchy set out in NPPF paragraph 175a.</p> <p>The ‘Biodiversity Gain Plan’ entry has been updated under the heading ‘What is required’ to reflect the full mitigation hierarchy -</p> <p><i>The Environment Act sets out that the Biodiversity Gain Plan should cover:</i></p> <ul style="list-style-type: none"> <li>• <i>How adverse impacts on habitats have been <u>minimised, mitigated, and compensated for.</u></i></li> </ul>
Suffolk County Council	<p><u>Health Impact Assessment</u> -</p> <p>SCC supports the inclusion of Health Impact Assessments (HIA). It is welcome that the validation list states that the focus should be local wellbeing needs and priorities, however it would</p>	<p>The Local Validation List requires Health Impact Assessments to be based on evidence and align with local health and wellbeing needs and priorities. The Council therefore supports the inclusion of new links to documents which provide</p>

	<p>be useful to point to local public health information. SCC suggests including links to: the Joint Strategic Needs Assessment for Suffolk: <a href="https://www.healthysuffolk.org.uk/jsna/index-of-reports">https://www.healthysuffolk.org.uk/jsna/index-of-reports</a></p> <p>and the Ipswich Place Based Needs Assessment: <a href="https://www.healthysuffolk.org.uk/uploads/Ipswich_PBNA_V2.pdf">https://www.healthysuffolk.org.uk/uploads/Ipswich_PBNA_V2.pdf</a></p> <p>SCC would also recommend linking to public health profiles from the Office for Health Improvement &amp; Disparities (the successor to public Health England), which can provide local data on a wide array of health indicators and data: <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a></p>	<p>information about local wellbeing needs and priorities.</p> <p>The suggested reference texts have been added to the 'Health Impact Assessment' entry, under the section 'Sources of further information and support' as follows –</p> <p><i><u>Joint Strategic Needs Assessment for Suffolk - <a href="https://www.healthysuffolk.org.uk/jsna/index-of-reports">https://www.healthysuffolk.org.uk/jsna/index-of-reports</a></u></i></p> <p><i><u>Ipswich Place Based Needs Assessment - <a href="https://www.healthysuffolk.org.uk/uploads/Ipswich_PBNA_V2.pdf">https://www.healthysuffolk.org.uk/uploads/Ipswich_PBNA_V2.pdf</a></u></i></p> <p><i><u>Office for Health Improvement &amp; Disparities - <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a></u></i></p>
Suffolk County Council	<p><u>Health Impact Assessment</u> -</p> <p>The validation list is not specific about when a HIA is needed (except in the case of EIA development) SCC Public Health would welcome discussions one when this may be appropriate. SCC would like to create a standard approach for HIAs across Suffolk, that would still focus on the needs of a specific place.</p>	<p>Ipswich Borough Council has had regard to the Local Validation Lists of other authorities in the Ipswich Strategic Planning Area to create a standard approach across Suffolk.</p> <p>The suggested reference texts have been added to the 'Health Impact Assessment' entry under the heading 'When is it required' -</p> <p><i><u>For all developments exceeding 100 dwellings.</u></i></p> <p><i><u>For all care/assisted living developments.</u></i></p>

		<u>Schemes involving the loss of, or creation, or expansion of health care facilities.</u>
Suffolk County Council	<p><u>Planning Statement</u> -</p> <p>It is suggested that this section also highlights the Suffolk Minerals and Waste Local Plan as a policy document that needs to be addressed in planning statements. Policies MP10 and WP18 are relevant to non-minerals and waste uses as they deal with the impacts of development and changes of use near to minerals and waste facilities on their operation. Developers should demonstrate that they adhere to these policies,</p> <p>Suffolk Minerals and Waste Local Plan:  <a href="https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/">https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/</a>  More advice on minerals and waste safeguarding issues can also be found in the Planning Practice Guidance, Paragraph: 005 Reference ID: 27-005-</p>	<p>Relevant development must have regard to the Suffolk Minerals and Waste Local Plan which is a material planning consideration. As such, the Ipswich Borough Council Local Validation List has been updated to include reference to the Suffolk Minerals and Waste Local Plan, Policies MP10 (Minerals consultation and safeguarding areas) and WP18 (Safeguarding of waste management sites).</p> <p>The suggested reference texts have been added to the 'Planning Statement' entry under the section 'Sources of further information and support' as follows –</p> <p><u><i>Suffolk Minerals and Waste Local Plan, Policies MP10 (Minerals consultation and safeguarding areas) and WP18 (Safeguarding of waste management sites) -</i></u>  <a href="https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/">https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/</a></p> <p><u><i>Planning Practice Guidance Minerals -</i></u>  <a href="https://www.gov.uk/guidance/minerals">https://www.gov.uk/guidance/minerals</a></p>
Suffolk County Council	<p><u>Sustainability Statement</u> -</p> <p>SCC agrees that adherence to CS1, DM1, and DM2 should be included within a sustainability</p>	<p>Policies CS2 (The Location and Nature of Development) and CS5 (Improving Accessibility of the Ipswich Local Plan) are relevant material</p>

	<p>appraisal, however it is suggested that there are other policies a Sustainability Statement should also address. SACC suggest that sustainability statements should also demonstrate adherence to Policy CS2: The Location and Nature of Development, as the location of a development is a core factor in its sustainability. It is also suggested that adherence to Policy CS5: Improving Accessibility could also included as part of Sustainability Statements, as the reducing the need to travel, and increase travel by sustainable modes is an important part of the local plan, which developers should demonstrate they can achieve. CS5 is currently not mentioned in any part of the validation list. In particular SCC would like the list to draw attention to the need to demonstrating 15% transport mode shift. Demonstrating adherence to policy CS5 (in particular the 15% mode shift target) may be more appropriate to the Transport and Highway reports section of the validation list, however SCCs view is that it should be noted somewhere within the validation list.</p>	<p>considerations when preparing a Sustainability Statement. Reference to these policies has been included under the headings ‘What is required’ and ‘Further sources of information and support’ for completeness. Specific mention has been made to the 15% modal shift transport target requirement under Policy CS5. The same text has also been included in the ‘Transport and Highways Report’ section for consistency.</p> <p>The suggested policy references have been added to the ‘Sustainability Statement’ entry, under the heading ‘What is required’ as follows –</p> <p><i>This assessment should outline the approach taken to ensure new development achieves a high standard of environmental sustainability in accordance with Policies CS1 (<u>Sustainable Development</u>), CS2 (<u>The Location and Nature of Development</u>), CS5 (<u>Improving Accessibility</u>) (in particular the 15% transport mode shift target), DM1 and DM2.</i></p> <p>And the heading ‘Sources of further information’ –</p> <p><i>Core Strategy Policies CS1 (<u>Sustainable Development</u>), CS2 (<u>The Location and Nature Of Development</u>), CS5 (<u>Improving Accessibility</u>), DM1 (<u>Sustainable Construction</u>), DM2 (<u>Decentralised Renewable or Low Carbon Energy</u>)</i></p>
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		Reference to Policy CS5 has also been added to the 'Transport and Highways Reports' entry, under the heading 'sources of further information' – <i>Core Strategy Policies CS5 (Improving Accessibility), CS20 (Key Transport Proposals) and DM21 (Transport Access in New Development)</i>
Suffolk County Council	<u>Sustainability Statement</u> - Under the "Further Sources of Information" section SCC would suggest including the Net Zero Carbon Toolkit for housing: <a href="https://www.greensuffolk.org/net-zero-carbon-toolkit-housing/">https://www.greensuffolk.org/net-zero-carbon-toolkit-housing/</a>	The SCC Net Zero Carbon Toolkit for Housing has been jointly prepared by the Suffolk authorities to help deliver aspirations for carbon neutrality across Suffolk. It is a helpful guidance document for house builders, architects, self-builders and consultants which explains how net zero can be achieved through construction.  The suggested reference texts have been added to the 'Sustainability Statement' under the heading 'Further sources of information and support' –  <i><u>Net Zero Carbon Toolkit for Housing -</u></i> <i><u><a href="https://www.greensuffolk.org/net-zero-carbon-toolkit-housing/">https://www.greensuffolk.org/net-zero-carbon-toolkit-housing/</a></u></i>
Suffolk County Council	<u>Transport and Highways Reports</u> - Generally SCC considers that this section provides a good overview of what should be included in a Transport Assessment/Statement and Travel Plan. In particular the emphasis on all modes of travel is supported. It is suggested that where the term "traffic flow" is used (on pages 61 and 62) this is replaced with the word	Paragraph 113 of the NPPF 2021 sets out that all developments that will generate significant amounts of movement should be required to provide a travel plan. The suggested wording would bring the Local Validation List in line with the NPPF 2021.

	<p>“movements”, to keep emphasis on all modes of travel and not just motorised modes. Amendments are proposed below.</p>	<p>The section ‘Transport and Highways Reports’ has been amended under the heading ‘What is required?’ as follows -</p> <p><i>“Data about current <del>traffic flows</del> <u>movements</u> on links and at junctions (including by different modes of transport and the volume and type of vehicles) within the study area and identification of critical links and junctions on the highways network.”</i></p> <p><i>In general, assessments should be based on normal <del>traffic flow</del> <u>movements</u> and usage conditions (e.g. non-school holiday periods, typical weather conditions) but it may be necessary to consider the implications for any regular peak traffic movement and usage periods (such as rush hours).</i></p>
<p>Natural England</p>	<p><u>Shadow Habitats Regulation Assessment including an Appropriate Assessment</u> - Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (‘RAMS’)</p> <ul style="list-style-type: none"> <li>• It is anticipated that new residential development (including new tourist accommodation) in this area is ‘likely to have a significant effect’ on the sensitive interest features of the European designated sites within the strategy, through increased recreational pressure when considered either alone or ‘in combination’ with other plans and projects and as such a Habitats Regulation Assessment will be required. As such, Natural England would recommend that the Suffolk Coast</li> </ul>	<p>New text has been added to the Local Validation List ‘Shadow Habitats Regulation Assessment including an Appropriate Assessment’ entry to highlight the role of the Suffolk Coast RAMS Strategy in mitigating for recreational disturbance impacts. The new text references the Suffolk Coast RAMS and the need for applicants seeking consent for new residential development to provide sufficient evidence to allow an Appropriate Assessment to be made.</p> <p>The ‘Shadow Habitats Regulation Assessment including Appropriate Assessment’ entry has been amended as follows -</p>

	<p>RAMS is considered at the validation stage – this would include whether the applicant is willing to pay the sum and, if the development is for 50 units or more, whether the applicant has considered our Green Infrastructure (GI) guidance (further information provided below and in Annex I). We advise that this would reduce the number of consultations for Natural England as a statutory consultee and the length of time between an application being validated and then decided.</p>	<p><u>When is it required?</u></p> <p><u>Development within 13km of internationally important nature conservation sites in Ipswich BC, Babergh DC, Mid Suffolk DC and East Suffolk requires mitigation for recreational disturbance impacts from dog walking and other recreational uses.</u></p> <p><u>The local authorities and Natural England have worked together to develop a strategy and mechanisms to implement Suffolk RAMS, this is set out in local plans and a Supplementary Planning Document.</u></p> <p><u>Mitigation is a combination of:</u></p> <ul style="list-style-type: none"> <li>• <u>Green infrastructure on housing development sites to encourage people to stay local and to reduce pressure on designated sites.</u></li> <li>• <u>A financial contribution based on the number of dwellings, to fund a wardening and visitor management scheme (Suffolk RAMS) for the designated sites themselves</u></li> </ul> <p><u>Applicants seeking consent for new residential development must provide sufficient evidence to allow the Appropriate Assessment to be made, which is the stage at which avoidance and/or mitigation measures can be considered. Enough evidence must be provided about the effectiveness of mitigation measures and likely significant effects to demonstrate that no</u></p>
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		<p><u>reasonable scientific doubt remains as to the absence of such effects.</u></p> <p><u>Please note that Natural England have advised that where there is a large development (50+ residential units), or where there is a small development in close proximity to a site (1.5km), consideration of further bespoke mitigation measures may also be required.</u></p> <p><u>For all new residential development over 50 dwellings (or equivalent) or in close proximity to a European designated site.</u></p>
Natural England	<p><u>Biodiversity Gain Plan</u> -</p> <ul style="list-style-type: none"> <li>• We advise that a BNG report is required as part of any planning application, in order to demonstrate that the BNG metric has been applied and the requirement identified by the Local Plan has been met. Further information is provided below.</li> </ul>	<p>In line with the NPPF and Policy DM8 (The Natural Environment) of the adopted Ipswich Local Plan 2018-2036 the Council is requesting net gain on all planning applications. However, the government have yet to confirm what types of development 10% BNG will apply to. It is understood that this will be set out in the secondary legislation. Checking BNG Reports and metric calculations for all applications would present a significant resource/skills burden. It is understood that DEFRA and Natural England will provide more information on new burdens funding for local planning authorities in due course. Until more detail is provided in the secondary legislation the Council will be adopting a pragmatic approach and only requesting BNG reports and metric calculations for major applications and minor applications (at the</p>

		officers' discretion, depending on the scale and nature of the proposal). The Council will review its position when BNG comes into force in England in November 2023.
Natural England	<u>Biodiversity Gain Plan</u> - Habitats Regulations Assessment (HRA) We support the requirement for new residential development applications to submit a shadow Habitat Regulation Assessment/Appropriate Assessment, according to The Local Validation List.	Comment noted.
Suffolk Constabulary	<u>Statement of Crime Prevention Proposals</u> - It is requested that for all major developments (as defined in the draft document) and any applications relating to public buildings and HMOs, are required to produce a statement that demonstrates that crime prevention measures have been incorporated into the design. This will ensure compliance with Ipswich Borough Council local Plan Policy DM12 Design and Character, to 'create safe and secure communities by complying with the relevant secure(d) by design guidance'. This should include reference to the relevant Secured By Design (SBD) guide, detailing how issues such as the layout of the whole development, orientation of buildings, natural surveillance, boundary treatments, parking arrangements, access control where appropriate, secure cycle storage provision and lighting have taken crime prevention guidance into account.	<p>The Council supports efforts to address crime and disorder and fear of crime through the planning system. A new section has been added to cover the requirement for a Statement of Crime Prevention. To reduce the burden on applicants, the new text acknowledges that it may be appropriate to include the requisite information within the Design and Access Statement.</p> <p>It was not considered appropriate to include Lucy Mures' contact details, as if she left Suffolk Constabulary the Local Validation List would become out of date, instead a link to <a href="https://www.securedbydesign.com">securedbydesign.com</a> has been provided.</p> <p>New validation requirement inserted as follows -</p> <p><b><u>When is this required?</u></b></p>

	<p>Annotated plans should be included where relevant.</p> <p>Members of the public can be directed to Design Guides (<a href="http://securedbydesign.com">securedbydesign.com</a>) or <a href="mailto:lucy.mures@suffolk.police.uk">lucy.mures@suffolk.police.uk</a> for further information.</p> <p>Measures to assist with viewing plans - It is requested that all plans include a key clearly defining all aspects of the plans.</p>	<p><u><i>For all major applications (as defined on page 4), public buildings and large Houses in Multiple Occupation (where there are more than six people living together as a single household).</i></u></p> <p><u><i>The Statement of Crime Prevention may be incorporated into the Design and Assess Statement where appropriate.</i></u></p> <p><b><u><i>What is required?</i></u></b></p> <p><u><i>A statement that demonstrates that crime prevention measures have been incorporated into the design.</i></u></p> <p><u><i>This should include reference to the relevant Secured By Design (SBD) guide, detailing how issues such as the layout of the whole development, orientation of buildings, natural surveillance, boundary treatments, parking arrangements, access control where appropriate, secure cycle storage provision and lighting have taken crime prevention guidance into account.</i></u></p> <p><u><i>Annotated plans should be included where relevant. It is requested that all plans include a key clearly defining all aspects of the plans.</i></u></p> <p><b><u><i>Sources of further information and support</i></u></b></p> <p><u><i>Core Strategy Policies CS16 (Green Infrastructure, Sport and Recreation), DM6</i></u></p>
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Suffolk Constabulary	That any amendments throughout the planning process made are accompanied by a summary document outlining the changes made	<p>The Council is committed to engaging the community in the planning application process. A summary document outlining the key changes would help to make the application process more accessible.</p> <p>New text added to 'Application Summary' entry under 'What is required' -</p> <p><u><i>Where amendments are made to an application during the planning process, it is recommended that the application summary should be updated or a document outlining the changes made should be submitted.</i></u></p>
Suffolk Constabulary	Community Consultation It is requested that the local police Design Out Crime Officer is included on invitations to public consultations.	Suffolk Constabulary are identified as a consultee in the Ipswich Borough Council's Statement of Community Involvement 2018 and will thus be consulted as appropriate.

<p>Suffolk Wildlife Trust</p>	<p><u>Biodiversity Gain Plan</u> -  The current draft states that “All major developments must submit a Biodiversity Gain Plan. For minor applications (excluding householders) the need for a Biodiversity Gain Plan will be dealt with on a case-by-case basis.”  The Suffolk Wildlife Trust’s view is that any development affecting an area of biodiversity value should seek to achieve Biodiversity Net Gain (BNG).  Paragraph 174 of the NPPF does not differentiate between minor and major developments. It states “Planning policies and decisions should contribute to and enhance the natural and local environment by: (d) minimising impacts on and providing net gains for biodiversity”.</p> <p>Schedule 14 of the Environment Act 2021 requires a biodiversity net gain plan for all planning applications. There is no reference to major or minor developments. There is a BNG metric specifically designed for small sites: The Small Sites Metric - JP040 (naturalengland.org.uk).</p> <p>We recognise that the secondary Regulations requiring statutory BNG have not yet been published. We suggest that in the meantime, any development which requires an ecological assessment according to the Suffolk Biological Information Service (SBIS)</p>	<p>In line with the NPPF and Policy DM8 (The Natural Environment) of the Ipswich Local Plan the Council are requesting net gain on all planning applications. However, the government have yet to confirm what types of development 10% BNG will apply to. It is understood that this will be set out in the secondary legislation. Checking BNG reports and metric calculations for all applications would present a significant resource/skills burden. It is understood that DEFRA and Natural England will provide more information on new burdens funding for LPAs soon. Until more detail is provided in the secondary legislation the Council will be adopting a pragmatic approach and only requesting BNG reports and metric calculations for major applications and minor applications (at the officer’s discretion, depending on the scale and nature of the proposal). The Council will review its position when BNG comes into force in England in November 2023.</p>
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	Biodiversity Checklist should also submit a BNG Plan.	
Suffolk Wildlife Trust	<p><u>Ecological Appraisal</u> - A Preliminary Ecological Appraisal (PEA) is a first step in assessing the effects of a development. Where a PEA requires that further surveys or assessments are required to support a planning application, those surveys and assessments should be undertaken and an Ecological Impact Assessment (EclA) should be submitted with the planning application.</p> <p>According to the CIEEM Guidance (referenced in your draft - <a href="https://cieem.net/wp-content/uploads/2019/02/Guidelines-for-Preliminary-Ecological-Appraisal-Jan2018-1.pdf">https://cieem.net/wp-content/uploads/2019/02/Guidelines-for-Preliminary-Ecological-Appraisal-Jan2018-1.pdf</a>) paragraph 1.5 “Under normal circumstances it is not appropriate to submit a PEAR in support of a planning application because the scope of a PEAR is unlikely to fully meet planning authority requirements in respect of biodiversity policy and implications for protected species.”</p> <p>Paragraph 1.8 of the CIEEM guidance goes on to state that “A PEA is normally used to inform an Ecological Impact Assessment (EclA). In the context of these guidelines, EclA is defined as the process of identifying, quantifying and evaluating the potential effects of development-related or other proposed actions on habitats, species and ecosystems. These</p>	<p>The ‘Ecological Appraisal’ entry has been updated inline with comments from Suffolk Wildlife Trust as follows –</p> <p><i>When is this required?</i></p> <p><del>There’s suitable habitat on the site to support protected species.</del></p> <p><del>It’s likely that protected species are present and may be affected by the proposed development.</del></p> <p><del>Protected species are present but you’re not sure if they’ll be affected.</del></p> <p><del>Use Table 1 to see where protected species are likely to be present to assess the chance of a development proposal affecting them.</del></p> <p><i>When the development is likely to affect any sites of biodiversity value, as defined by the SBIS Biodiversity Validation Checklist.</i></p> <p><i>What is required?</i></p> <p><del>Sufficient detail to fully consider the effect on protected species and their habitats.</del></p>

	<p>guidelines should be read in conjunction with CIEEM's Guidelines for Ecological Impact Assessment in the UK and Ireland.” We therefore suggest that this section should be titled “Ecological Impact Assessment”. Your draft states “When is this required? There’s suitable habitat on the site to support protected species. It’s likely that protected species are present and may be affected by the proposed development. Protected species are present but you’re not sure if they’ll be affected. Use Table 1 to see where protected species are likely to be present to assess the chance of a development proposal affecting them”.</p> <p>An Ecological Impact Assessment is required for any development affecting sites of biodiversity value, not just those supporting protected or priority species. Section 41 of the Natural Environment &amp; Rural Communities Act refers to both species and habitats of Principal Importance (ie Priority Habitats and Species).</p> <p>Paragraph 174 of the NPPF states that “Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value...”</p>	<p><del>Details of mitigation measures planned to avoid harm or disturbance to protected species and their habitats with the location, layout, design and timing of the development.</del></p> <p><i>All planning applications should show that they have used to SBIS Biodiversity Checklist when they are submitted. Where this Checklist suggests an Ecological Impact Assessment Report is required applications shall be supported by an adequate survey and, where ecological reports recommend that further surveys may be necessary these further surveys shall also be provided. The findings of the report shall be available as part of the application submission details displayed on the website.</i></p> <p><i>Failure to submit the required report could result in your application not being registered. If providing a preliminary ecological report, a further report could be requested at some stage</i></p>
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	<p>We therefore suggest this section should state: “When is this required? When the development is likely to affect any sites of biodiversity value, as defined by the SBIS Biodiversity Validation Checklist”.</p> <p>We suggest you should provide a link to the SBIS checklist Suffolk Biodiversity Validation Checklist   Suffolk Biodiversity Information Service (<a href="http://suffolkbis.org.uk">suffolkbis.org.uk</a>), not just the home page of SBIS, as it does now.</p> <p>We suggest that this section also states:</p> <p>All planning applications should show that they have used to SBIS Biodiversity Checklist when they are submitted. Where this Checklist suggests an Ecological Impact Assessment Report is required applications shall be supported by an adequate survey and, where ecological reports recommend that further surveys may be necessary these further surveys shall also be provided. The findings of the report shall be available as part of the application submission details displayed on the website.</p> <p>Failure to submit the required report could result in your application not being registered. If providing a preliminary ecological report, a further report could be requested at some stage</p>	
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	This would make IBC's validation checklist consistent with those for St Edmundsbury and Babergh & Mid Suffolk Councils.	
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### **Internal Consultation Responses**

<b>Respondent</b>	<b>Consultation Response</b>	<b>IBC Response / Modification</b>
Internal consultee	<u>Site Sections</u> - Ground levels - any changes should to be an off-site fixed datum point.	<p>For accuracy and consistency ground level measurements should be taken from a fixed datum point offsite. Text reflecting this requirement has been added to the 'Site Sections (existing and proposed)' entry as follows -</p> <p><b><i>When is it required?</i></b></p> <p><i>Where a proposal involves a significant change in ground levels, illustrative drawings should be submitted to show both existing and finished levels <u>(with levels related to an off-site fixed datum point)</u>.</i></p>
Internal consultee	<u>Street Scene</u> - Proposed street scenes are required for major developments which will include those within the site.	<p>A Street Scene Plan depicts buildings and the layout of streets. It is beneficial for a range of development types in helping to assess the impact on the surrounding area. New text has been added to the 'street scene' entry requiring major applications to provide a street scene plan.</p> <p><b><i>When is it required?</i></b></p> <p><i><u>For all major applications (as defined on page 20).</u></i></p>

		<del>Required</del> For works that will be visible from the road, especially new buildings or large side extensions that will be near to the boundary/neighbouring buildings, <del>or</del> <u>Where there is a notable difference in heights between the proposed works and neighbouring dwellings/buildings.</u>
Internal consultee	<u>Construction Management Plan</u> – Not clear if it is a validation requirement as it gives the option as a pre-commencement condition. Are you expecting it to be advised that in the absence of this plan they would accept a pre-commencement condition.	<p>New text has been added to the ‘Construction Management Plan’ entry to clarify that a construction management plan is not an essential validation requirement and can be secured via a pre-commencement condition -</p> <p><b>When is it required?</b></p> <p><i>For development that involves significant construction or earthworks.</i></p> <p><u>This is not an essential requirement for determining an application but if it is not submitted as part of the planning application process for new development, a pre-commencement condition will be imposed on the grant of planning permission.</u>  <del>To be submitted as part of the planning application process for new development or as a pre-commencement condition.</del></p>
Internal consultee	<u>Health Impact Assessment</u> – Who determines if the impact is significant – open to interpretation.	It is agreed that greater clarification is needed with respect to when a Health Impact Assessment (HIA) is required. There is no national guidance on when a HIA is needed. As such the Ipswich

		<p>Borough Council has had regard to the Local Validation Lists of other authorities in the Ipswich Strategic Planning Area to create a standard approach across Suffolk. New text has been added to the Health Impact Assessment entry under the heading 'when is it required' -</p> <p><b><i>When is it required?</i></b></p> <p><u><i>For all developments exceeding 100 dwellings,</i></u></p> <p><u><i>For all care/assisted living developments,</i></u></p> <p><u><i>Schemes involving the loss of, or creation, or expansion of health care facilities.</i></u></p> <p><del><i>A Health Impact Assessment is required for any development</i></del> <u><i>All applications</i></u> where there is expected to be significant impact on the health and wellbeing of the local population or particular groups within it.</p>
Internal consultee	<p><u>Additional strategies specific to all outline/full planning applications for development at the Ipswich Garden Suburb</u> - The IGS SPD lists specific requirements expected to come forward within applications which with the present text does not make this clear.</p>	<p>The Local Validation List 2023 has been updated to reflect the information requirements in Chapter 10 (Requirements for Future Planning Applications) of the adopted Ipswich Garden Suburb SPD.</p> <p>The 'Additional strategies specific to all outline/full planning applications for development at the Ipswich Garden Suburb' has been updated as follows -</p>

		<p><i>The requirements for the following documents will be agreed with IBC at pre-application stage:</i></p> <p><i>(i) Infrastructure Delivery Plan, which should include an assessment of local sports and recreation facilities to inform on-site provision; (ii) Neighbourhood Management Plan, which should address how the future maintenance of community spaces shall be secured; (iii) Community Development Strategy; and (iv) Utility Infrastructure Report; which may be included within the Environmental Statement or another suitable document.</i></p> <p><u><i>The following information should be submitted as part of an outline planning application for the development of the site. This list is not exhaustive and further requirements may be identified through pre-application discussions, whilst some items may be more appropriate for consideration at reserved matters stage dependent on the extent of approval sought by the applicant(s) at outline stage:</i></u></p> <p><b><u>Masterplanning &amp; Design</u></b></p> <ul style="list-style-type: none"> <li>• <u><i>Illustrative master plan of site, whilst a series of site plans should identify open space networks and different land uses with sequencing, and also outline indicative densities and building heights by land area.</i></u></li> </ul>
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		<p><u>water run-off, waste, pollution, health and wellbeing, management, ecology and transport. This should also include estimated energy loads and consumption as well as predicted CO2 (carbon) emissions of the overall development, in addition to BREEAM assessments (if appropriate). The Council's Sustainability Development Checklist should be included as an appendix to such assessments.</u></p> <p><b><u>Traffic &amp; Transport</u></b></p> <ul style="list-style-type: none"> <li>• <u>Whole-site Transport Assessment</u></li> <li>• <u>Whole-site Framework Travel Plan – outlining measures to encourage new residents and employees on site to use sustainable modes of transport</u></li> <li>• <u>Whole-site Public Transport Strategy – outlining a strategy for providing viable sustainable transport options</u></li> <li>• <u>Public Rights of Way Statement – assessing the impact on existing access routes</u></li> <li>• <u>Highway/Home Zone design report and any other reports &amp; modelling as required in consultation with Suffolk County Council Highways department</u></li> </ul> <p><b><u>Environmental Impact</u></b></p> <ul style="list-style-type: none"> <li>• <u>Environmental Statements</u></li> <li>• <u>Landscape Assessments</u></li> <li>• <u>Arboricultural Survey &amp; Landscape Plan, including tree and hedgerow removal details</u></li> </ul>
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		<ul style="list-style-type: none"> <li>• <u>Biodiversity &amp; Ecological Reports including Management Plan – survey timings to be agreed with Ipswich Borough</u></li> <li>• <u>Council in consultation with Suffolk County Council &amp; Natural England</u></li> <li>• <u>Archaeology Assessments</u></li> <li>• <u>Air Quality Assessment – to include Low Emission Strategy</u></li> <li>• <u>Noise &amp; Vibration Assessments</u></li> <li>• <u>Flood Risk Assessment</u></li> <li>• <u>Sustainable Drainage Strategy (subject to both planning and SAB approval)</u></li> <li>• <u>Heritage Statement – with particular regard to the setting of Red House Farm complex</u></li> <li>• <u>External lighting Assessments – to include assessment on habitat areas and where details of high-intensity lighting (e.g. MUGA floodlights) are included or indicatively shown near to sensitive/residential areas</u></li> <li>• <u>Land Contamination Assessments</u></li> <li>• <u>Site Waste Management Statement</u></li> <li>• <u>Construction Management Plans</u></li> <li>• <u>Utility Infrastructure Report</u></li> </ul>
Internal consultee	<p><u>Joinery and Architectural Details</u> - The request for joinery drawings might lead to us receiving some drawings we don't need. Clarify that this is mainly about heritage buildings.</p>	<p>New text has been added to the 'Joinery and Architectural Details' entry to clarify that such plans are only required when traditional features on heritage assets are being replaced -</p> <p><b><i>When is it required?</i></b></p>

		<i>Required when <u>traditional features such as windows, doors, shop fronts, stone and brick details and roof details (chimneys and eaves) details are being replaced on heritage assets. such as windows and doors.</u></i>
Internal consultee	Page 15 to 21 – Should plans also state the paper size which is needed for measuring on the Council’s Information at Work system?	The requirement to state the ‘paper size’ on plans/drawings has been made to the following items in the Local Validation List 2023 - Block Plans, Elevations (Existing and Proposed), Floor Plans (Existing and Proposed), Site Sections (Existing and Proposed), Street Scene (Existing And Proposed), Joinery and Architectural Details (Existing And Proposed). This amendment will help to ensure that plans can be accurately measured on the Council’s system Information at Work.
Internal consultee	<u>Application Form</u> - Non-residential floorspace should include circulation and service space as well as any mezzanine levels.	The ‘Application Form’ entry has been updated, under the heading ‘What is required,’ to clarify that mezzanine levels should be included within gross internal floor space calculations -  <i>Non-residential Floorspace – Gross internal floorspace is the internal area of the building, and should include circulation and service space, <u>as well as any mezzanine levels.</u> Where more than one Use Class is proposed as part of any development, floorspace should be specified for each separate planning unit (by Use Class).</i>

Internal consultee	<u>Application Form (Employment)</u> – End of this paragraph should say if known. Many applicants simply won't know if speculative.	<p>The suggested wording has been added to the 'Application Form' entry under the heading 'What is required' to address a typographical error -</p> <p><i>Employment – Please give details of the total number of existing people (i.e. already employed on the site and any additional staff to be employed (in both full-time and part-time employment) as a result of the proposal being implemented, and calculate the total full-time equivalent posts, <u>if known</u>.</i></p>
Internal consultee	<u>Application Form</u> – Word omission - Where a question is not (word missing??) or the words....	<p>The suggested wording has been added to the 'Application Form' entry under the heading 'What is required' to take account of speculative applications -</p> <p>Where a question is <u>not applicable</u> or the words "Not Applicable" or "N/A" should be inserted for clarity.</p>
Internal consultee	Location Plan - A location plan should show the direction of north and identify sufficient roads and/or buildings on <u>all</u> land adjoining the application site.	<p>The suggested wording has been added to the 'Location Plan' entry under the heading 'What is required' to address a typographical error -</p> <p><i>A location plan should be based on an up-to-date map. The scale should typically be 1:1250 or 1:2500, but wherever possible the plan should be scaled to fit onto A4 or A3 size paper. A location plan should show the direction of north and identify sufficient roads and/or buildings on <u>all</u> land</i></p>

		<i>adjoining the application site to ensure that the exact location of the application site is clear.</i>
Internal consultee	<u>Joinery and Architectural Details</u> – Define what we mean by a heritage asset?	<p>For clarity, the NPPF 2021 definition of heritages assets has been included as a footnote to the ‘Joinery and Architectural Details’ entry -</p> <p><i><u>Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).</u></i></p>
Internal consultee	<u>Community Consultation Statement</u> - All relevant Ipswich Borough Council and Suffolk County Council Ward Councillors – perhaps add (including neighbouring ward members if proposal is on the edge of a ward)	<p>The Ipswich Statement of Community Involvement 2018 makes clear that relevant Ward Councillors should be engaged in application discussions as relevant. The suggested amendment would bring the Local Validation List 2023 inline with the Ipswich Statement of Community Involvement 2018.</p> <p>The suggested amendment has been made to the ‘Community Consultation Statement’ entry under the heading ‘What is required’ -</p> <p><i><u>In terms of who should be invited to each event, as a minimum this should include the local MP, all relevant Ipswich Borough Council and Suffolk County Council Ward Councillors (including neighbouring ward members if proposals are on</u></i></p>

		<i>the edge of a ward), the Planning and Museums Portfolio Holder, the Leaders of the political groups, any known landowners or occupiers of the application site, adjoining owners and occupiers and residents groups.</i>
Internal consultee	Lighting Assessment – Amend typographical error ‘Significant externals- lighting and adverts...’	An amendment has been made to the ‘Lighting Assessment’ entry under the heading ‘What is required’ to address a typographical error -  <i>All developments proposing or including:</i> <ul style="list-style-type: none"> <li>• <i>Significant externals lighting and adverts.</i></li> </ul>
Internal consultee	Marketing Information - Proposals in the Central Shopping Area for change of use from Class E to a non-Class E use that would fall above the defined thresholds identified in Policy DM27 – does the policy require this?	Amendments have been made to the entry ‘Marketing Information’ to bring the Local Validation List in line with adopted Local Plan 2018-2036 Policy DM27 (The Central Shopping Area) -  <b><i>When is this required?</i></b>  <i>Planning applications for:</i> <ul style="list-style-type: none"> <li>• <del><i>Proposals in the Central Shopping Area for change of use from Class E to a non-Class E use that would fall above the defined thresholds identified in Policy DM27.</i></del></li> <li>• <i>Proposals in District and Local Centres for the change of use of ground floor units to F1, F2 and other suitable Sui Generis uses which meet the needs of the local community (DM30).</i></li> </ul>

		<ul style="list-style-type: none"> <li>• <i>Non B1 (Business), B2 (General Industrial) and B8 (Storage or Distribution) uses on land allocated for such purposes in the development plan (DM33).</i></li> <li>• <i>Proposals for substantial harm to (or total loss of significance of) a designated heritage asset (as defined on page 21).</i></li> <li>• <i>The loss of a community facility (as defined through Policy DM24).</i></li> <li>• <i>The loss of arts, cultural and tourism facilities, including visitor accommodation (DM28); and</i></li> <li>• <i>Change of use or redevelopment of a public house (DM28).</i></li> </ul> <p><u><i>In cases where applicants are proposing a change of use from a Class E use to a non-Class E use that would fall above the defined thresholds, it is advised that they enter into pre-application discussions with the Council to determine the type of information that would be required to robustly demonstrate that it would add to the vitality and viability of the zone.</i></u></p> <p><i>The need for such evidence should be clarified with the Local Planning Authority at pre-application stage including the scope of the marketing exercise and timescales.</i></p>
Internal consultee	Tree survey - Where development affecting trees or hedgerows is proposed, should the list define mature or semi-mature trees?	No change proposed. Under Policy DM9 (Protection of Trees and Hedgerows), <i>“where development affecting trees or hedgerows is proposed, the application must be accompanied</i>

		<p>by: f) an accurate survey and assessment of all existing trees and hedgerows on site in accordance with BS5837 'Trees in relation to design, demolition and construction – Recommendations)' 2014 by a competent arboriculturist..." The need for a tree survey applies to all development affecting trees and hedgerow, not just semi-mature or mature trees.</p>
Internal consultee	<p><u>Townscape Assessment (see Landscape/Townscape and Visual Impact Assessment)</u> - This is required for all infill proposals in a built-up frontage. Under the heading 'what is required' the text states it can be provided in a Design and Access Statement, but many proposals will not require a Design and Access Statement. It also states that it should be undertaken by a competent expert. Should this be limited to infill within a Conservation Area where a Design and Access Statement is required?</p>	<p>See revised entry for Landscape/Townscape and Visual Impact Assessment -</p> <p><b><u>When is this required?</u></b></p> <p><u>A LVIA/TVIA is required for any development that would likely have a significant impact on the landscape or townscape. This may form part of an environmental statement where a proposal would fall within the guidelines of an environmental impact assessment (EIA) development.</u></p> <p><b><u>What is required?</u></b></p> <p><u>An LVIA will be required to be prepared in accordance with the latest Landscape Institute guidance (currently GLVIA3: Guidelines for Landscape and Visual Impact Assessment).</u></p> <p><u>Where a proposal is an EIA development it will be required to be carried out by a competent expert and the assessment must include a statement outlining the relevant expertise or qualifications of</u></p>

		<p><u>such experts (normally a Chartered Member of the Landscape Institute).</u></p> <p><u>Core Strategy Policies DM12 (Design and Character) and DM13 (Built Heritage and Conservation) -</u> <u><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/core_strategy_and_policies_dpd_review.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/core_strategy_and_policies_dpd_review.pdf</a></u></p> <p><u>Ipswich Borough Council Conservation Area Appraisals (various dates) -</u> <u><a href="https://www.ipswich.gov.uk/content/about-our-conservation-areas">https://www.ipswich.gov.uk/content/about-our-conservation-areas</a></u></p> <p><u>Ipswich Borough Council Local List (Buildings of Townscape Interest) Supplementary Planning Document (2021) –</u> <u><a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/local_list.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/local_list.pdf</a></u></p> <p><u>Landscape Institute, Guidelines for Landscape and Visual Impact Assessment (GLVIA3)</u></p> <p><u>Historic England Advice Note, The Setting of Heritage Assets -</u> <u><a href="https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a></u></p>
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Internal consultee	<p><u>Application Form</u> - Add a link to Suffolk County Council Carparking Standards and SCC Streets Design Guide.</p>	<p>It is important that the Local Validation List includes links to the most up-to-date policy documents and guidance.</p> <p>The suggested reference has been added to the 'Application Form' entry as follows –</p> <p><u><i>Suffolk Guidance for Parking (November 2015, amended May 2019) - <a href="https://www.suffolk.gov.uk/asset-library/imported/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf">https://www.suffolk.gov.uk/asset-library/imported/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf</a></i></u></p> <p><u><i>Suffolk Design Streets Guide 2022 - <a href="https://www.suffolk.gov.uk/asset-library/imported/5647-21-Suffolk-Design-Street-Guide-v26.pdf">https://www.suffolk.gov.uk/asset-library/imported/5647-21-Suffolk-Design-Street-Guide-v26.pdf</a></i></u></p>
Internal consultee	<p><u>Design and Access Statement</u> - Emphasise that the Design and Access Statement should also reflect the design response to accessible and adaptable places with a supporting disability access statement. NPPF 112/130(f).</p>	<p>New text has been added to the 'Design and Access Statement' entry to reflect the NPPF 2021 requirement for accessible and adaptable places.</p> <p><u><i>Design and Access Statements must also explain the design response to creating accessible and adaptable places including disability access and how relevant NPPF (paragraphs 113 and 130) and Local Plan policies have been taken into account, see also Disability Access Statement. They must detail of any consultation undertaken in relation to the proposal access issues, and how the outcome of this consultation has informed the proposed development. Applicants must also</i></u></p>

		<p><u>explain how any specific issues which might affect access to the proposed development have been addressed.</u></p> <p><u>National Planning Policy Framework (NPPF) 2021, Paragraphs 113 and 130(f) - <a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a></u></p> <p>New validation requirement for Disability Access Statement inserted as follows -</p> <p><u>When is it required?</u></p> <p><u>For housing, development where 10 or more homes will be provided.</u></p> <p><u>What is required?</u></p> <p><u>The statement should set out the measures used to achieve the requirements of the relevant standards under Building Regulations Part M4(2) and include or refer to plans which show compliance with the Building Control requirements. This can be included in Design and Access Statement.</u></p> <p><u>Building Regulations Access and use of building: Approved Document M - <a href="https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m">https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m</a></u></p>
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Internal consultee	Site Specific Viability Appraisal – Make reference to this being in the public domain.	<p>New text has been added to the ‘Site Specific Viability Appraisal’ entry under the heading ‘what is required’ to reflect the Planning Practice Guidance on Viability.</p> <p><u>Please note that any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances. Even in those circumstances an executive summary should be made publicly available.</u></p>