

Ipswich Borough Council

Strategic Environmental Assessment and Sustainability Appraisal of Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document.

Summary of Comments and Council's Responses in relation to Sustainability Appraisal Incorporating Strategic Environmental Assessment Scoping Report for the Ipswich Local Development Framework Preferred Options (November 2007)

Published September 2015

The tables below summarise the comments received on the Sustainability Appraisal during the January – March 2008 Preferred Options consultation. The Council initially responded to these comments during 2009 and subsequently considered the comments again during 2012 when it was decided to proceed with a combined Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document. Please note that the Preferred options consultation also related to the adopted 2011 Core Strategy and Policies Development Plan Document. Comments relating specifically to the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document begin on page 44.

No. of objections	No. of supports	Name of consultee	Key Objections / Support issues raised	Officer's Commentary/Response (2009)	Suggested outcome / recommendation	Update 2012
Whole Document						
4	0	Objectors Go East Environment Agency, Mersea Homes, David Wilson Homes	Questionable that the SA states that no issues have arisen from the Preferred Options that are considered to have a significant impact on the Stour and Orwell Estuaries SPA and RAMSAR. (EA).	Noted. New residential development may have a cumulative impact on the European sites; therefore it is possible that an Appropriate Assessment needs be carried out.	Engage with Natural England to obtain their view on need for, and approach to, Appropriate Assessment.	An Appropriate Assessment has now been carried out under the Habitat Regulations and its findings have been incorporated into the adopted Core Strategy. A Habitats Regulations Assessment will be carried out on the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document.

			Referring to comments by Anglian Water in the Site Allocations DPD that the treatment works are currently at capacity and the off-site infrastructure works are required for water supply networks and sewage treatment – further residential development may overload the system with implications for the designated Orwell European site. (EA)	Noted	As above, Appropriate Assessment would check all likely significant impacts on the SPA.	An Appropriate Assessment has now been carried out under the Habitat Regulations and its findings have been incorporated into the adopted Core Strategy. A Habitats Regulations Assessment will be carried out on the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document.
			Development should not take place before any required improvements are carried out as advised by the Haven Gateway Water Cycle Study which will inform the assessment of the capacity of the existing sewage infrastructure to cope with levels of development. (EA)	Noted. The Water Cycle Study will be considered when complete.	No change.	The Water Cycle Study did not specify improvements. Site allocations will be discussed with Anglian Water.
			It is not explicitly evident from reading the Core Strategy that the findings of the SA report support the Authority's preferred options and how decisions about the spatial strategy have been reached. (GO East)	This was covered through the SA process rather than in the Core Strategy itself. Scores for alternative options are in Table 7.5 and discussed in the following commentary.	No change	N/A

			Relationship between the sections headed 'Summary of issues and options consultation results' and 'Comments on other possible approaches' is unclear and does not state whether stakeholders and the community had the opportunity to comment on other possible approaches.	The comments on other possible approaches do generally refer back to the Issues and Options document.	No change	N/A
			There is little relationship with the Preferred Options and the Sustainability Appraisal as the LDF evaluation has taken place in advance of the evidence gathering stage, therefore there is no indication that it has informed the Preferred Options.	The work carried out through SA has informed the production of the Preferred Options documents e.g. alternatives to the preferred options have also been appraised. SA is an iterative process and exposes potential impacts for the Council to consider as it prepares planning documents.	No change.	N/A

			SA is seriously flawed in its approach to the following key areas: Flood risk / climate change; Government Planning Policy; Chain of Conformity; Evaluation of options; Missing Evidence.	The SA of the preferred options has been prepared in accordance with the guidance and builds on earlier work carried out at issues and options stage. Evidence gathering is ongoing and future iterations of the SA will pick up new evidence.	New evidence to emerge to be considered through future work.	The most up to date evidence available at the time is used for each iteration of the sustainability appraisal. E.g. the Council published a Level 2 Strategic Flood Risk Assessment in May 2011.
			SA has avoided its duty (PPS12) to undertake robust evaluation, but has supported the Preferred Options without evidence or in many instances in spite of it.	The SA process was a very thorough evaluation based on the data available for Preferred Options.	No change.	Evidence gathering is ongoing and the most up to date evidence available at the time is used for each iteration of the sustainability appraisal.
			Concern that the SA has not been informed by the necessary evidence base which has prevented a full appraisal being undertaken.	The SA has been informed by the evidence provided at that time. The evidence base will grow throughout the plan preparation process and future work will pick this up.	To be updated as the evidence base grows.	Evidence gathering is ongoing and the most up to date evidence available at the time is used for each iteration of the sustainability appraisal.

Section A: Non-Technical Summary						
1 Summary: Comments on whole section						
3	0	Objectors Stephen Marginson, Mersea Homes	Strategies do not provide any sound basis for reducing traffic and pollution, improving traffic flow or improving sustainable transport and cycle and pedestrian facilities.	Policy Area 28: Carbon Footprint and Policy Area 34: Travel Demand Management both reflect some of these aspects.	Ensure the wording of policies addresses sustainable transport matters.	The adopted Core Strategy supports the Travel Ipswich Scheme (formerly 'Ipswich, Fit for the 21st Century') to encourage switching to more sustainable modes through Policy CS20, and addresses accessibility in new developments through development management policies DM15-17.
			Disagree with the proposal that weakness with regard to weakest sustainability can easily be dealt with by strengthening the final wording of policy.	SA exposes potential impacts which can then be considered against other policy objectives. Final decisions about policies may also be informed by the scope for mitigation of any negative impacts.	No change.	N/A
			Both policy and spatial strategy should be reviewed to take account of the impact of climate change in accordance with government policy.	ET6 considers climate change impacts.	No change.	N/A
			SA should confirm that proposals which do not conform to government planning policy cannot be considered as being	Proposals should be considered on their merits against the sustainability objectives.	No change.	N/A

			sustainable.			
			The assumption that positive impacts can be maintained, as flood risk can be mitigated by the flood barrier and short term design mitigation, is flawed as the flood barrier has not been constructed. If constructed the flood barrier will not change the existing zone 3 designation.	There is at this stage a reasonable expectation that the flood defences will be completed. The Ipswich Flood Defence Management Strategy has been agreed.	No change.	The Council published a Level 2 SFRA (2011), and an SPD on development and flood risk has been adopted. Delivery of the Ipswich tidal defences is progressing. A funding contribution has been agreed in principle from Regional Growth Fund.
			Cannot accept that flood barrier would mitigate against risk of flooding, this is directly contrary to PPS1, PPS 25 and the Environment Agency standing advice.	The flood barrier would mitigate the risk of flooding and is supported by the Environment Agency by securing the first phase of funding on 25th March 2008.	Continue the liaison with Environment Agency.	Delivery of the Ipswich tidal defences is progressing with funding for the barrier agreed in principle from Regional Growth Fund.
1.4 Site Allocations and Policies						
0	1	Supporter RSPB	Agree with findings that ecological value of sites should be assessed	Noted.	No change.	N/A
Section B: Introduction						
3: Method of Assessment						
2	0	Objectors Environment Agency	The regional quality assurance checklist under chapter 23 should be placed towards the front of the SA report (EA)	Noted but do not consider that the list needs to be relocated as it refers back to preceding chapters.	No change.	N/A

			The SA report should incorporate a table that demonstrates how the SA objectives, suitably grouped, relate to the SEA themes (EA)	No new insights are likely to result from doing it. Would not serve a purpose as SA is the overall requirement.	No change.	N/A
			The SA guidance requires consideration of the effect of an option, policy or proposal on an objective. Assessing a topic area only arguably does not entirely meet with the SA guidance (EA)	Policy areas were considered against the SA objectives as part of the iterative process of developing appropriate policy. Precise policy wordings will also be appraised in due course as SA is an iterative process.	No change.	Further iterations of SA appraised draft policy wordings, e.g.as set out in the SA report published for comment alongside the draft Core Strategy in September 2009. The same approach to be used for Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD.
			Only being able to appraise the topic areas as opposed to draft policy wording represents a technical deficiency. (EA)	Policy areas were considered against the SA objectives as part of the iterative process of developing appropriate policy. Precise policy wordings will also be appraised in due course as SA is an iterative process.	No change.	Further iterations of SA appraised draft policy wordings, e.g.as set out in the SA report published for comment alongside the draft Core Strategy in September 2009. -The same approach to be used for Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD.

3.8 Appropriate Assessment						
2	1	Objectors Environment Agency, Mersea Homes Supporter RSPB	The Council should re-consider carrying out an appropriate assessment to assess the potential effect of development on the European sites (EA)	Noted. New residential development may have a cumulative impact on European sites; therefore it is likely that an Appropriate Assessment needs be carried out.	Engage Natural England to obtain their view on the need for and approach to Appropriate Assessment.	An Appropriate Assessment has now been carried out under the Habitat Regulations and its findings have been incorporated into the adopted Core Strategy. A Habitats Regulations Assessment will be carried out on the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document.
			The construction of the flood barrier will give rise to a possibility of secondary impact on the lower reaches of the River Orwell possibly affecting the Stour and Orwell Special Protection Areas.	The need for an Appropriate Assessment of the LDF will be considered.	Dialogue with Natural England to establish the level of detail they expect to see in the Appropriate Assessment.	An Appropriate Assessment has now been carried out under the Habitat Regulations and its findings have been incorporated into the adopted Core Strategy. A Habitats Regulations Assessment will be carried out on the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document.
			SA should appraise the Preferred Options on a precautionary basis that the flood barrier is not currently funded or programmed	The Ipswich Flood Defence Management Strategy is supported by the Environment Agency which announced the first phase of funding secured for this project.	No change.	Delivery of the Ipswich tidal defences is progressing with funding for the barrier agreed in principle from Regional Growth Fund.
			Agree with finding that sites near the SPA may need appropriate assessment (RSPB)	Noted.	No change.	N/A

Section B: Introduction						
4 State of the Environment						
2	0	Objectors GeoSuffolk, Environment Agency	There is a paucity of information on the state of environmental assets such as wildlife sites and watercourses within the Council's area (also suggest sources of data) (EA)	Environmental data is collected by the Suffolk Sustainability Appraisal Group and the Council's AMR contains information relating to some environmental indicators.	No change.	N/A
			Data obtained from the regular air monitoring should form part of the baseline evidence. (EA)	Strategic air quality maps are included in the document in Chapter 4.	No change.	N/A
			Lack of information on geodiversity. Section should be split into landscape, biodiversity and geodiversity.	Geodiversity could be mentioned explicitly. However the SA focuses on issues and there are no known RIGS in Ipswich.	Consider how geodiversity is addressed in future work.	Adopted Core Strategy Policy CS4 now explicitly protects geological assets.
			Baseline information needs to be collected regarding local sites of geodiversity interest and geodiversity in the wider environment as per PPS9.	Noted, however all SSSIs are already considered (which includes geological site at Stoke Tunnel) and currently Ipswich does not have any RIGS.	Consider updating as information becomes available or sites designated.	Ipswich does now have a RIG at Holywells Park. This will be taken into account in future SA work.
4.4 Limitations of Information and Assumptions						
2	0	Objectors GeoSuffolk, Mersea Homes	Baseline information needs to be collected regarding local sites of geodiversity interest and geodiversity in the wider environment	Noted, however all SSSIs are already considered (which includes geological site at Stoke Tunnel) and currently Ipswich does not have any RIGS.	Consider updating as information on local sites becomes available. Check that plan	Ipswich does now have a RIG at Holywells Park. This will be taken into account in future SA work.

					addresses geodiversity.	
			Some documents are missing or out of date, including: SHMA; SHLAA; Strategic Flood Risk Assessment; an up to date Annual Monitoring Report – more appropriate judgements could be made if such data was available.	Evidence base is still being gathered and documents will be considered as they are completed. The Council publishes an AMR annually.	Any relevant new evidence will be addressed in future work.	Evidence gathering is ongoing and the most up to date evidence available at the time is used for each iteration of the sustainability appraisal.
5 Sustainability Objectives and Criteria						
2	0	Objectors GeoSuffolk, Environment Agency	Table 5.1 Should include reference to the Suffolk Geodiversity Action Plan.	Table 5.1 is a summary, however geodiversity should be picked up in future work.	Check that plan addresses geodiversity.	Adopted Core Strategy Policy CS4 now explicitly protects geological assets. Impacts on geological assets to be considered through production of Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document where relevant.
			Table 5.2 should include biodiversity as part of Sustainability Appraisal	Table 5.2 includes ET8: To conserve and enhance biodiversity.	No change.	N/A
			The Council should take into consideration the recently adopted Planning and Climate Change Supplement to PPS1 (EA)	Noted and agreed.	Check plan addresses climate change.	Adopted Core Strategy Policy CS1 addresses climate change. Impacts on climate change to be considered through production of Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document.
			Framework differs slightly from that agreed by the Suffolk Sustainability Appraisal Group.	This reflects local concerns and priorities in Ipswich and scoping consultation.	No change.	N/A
5.3 The SA Framework						

2	0	Objectors GeoSuffolk	Geodiversity and biodiversity should be included	Biodiversity is explicitly included, however geodiversity should be picked up in future work.	Check that plan addresses geodiversity.	Adopted Core Strategy Policy CS4 now explicitly protects geological assets. Impacts on geological assets to be considered through production of Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document where relevant.
Section C Core Strategy						
6 Main Objectives and general comments on Section C						
7		Objectors Environment Agency, GeoSuffolk, Crest Nicholson, S Marginson, Mersea Homes	Should clarify whether scores given in Table 6.1 are derived from Table 6.2 (EA)	Paragraph 6.6 should refer to Table 6.2 from which Table 6.1 is derived.	Ensure correct table references included at next stage.	The table numbers changed in the SA report published at the submission stage in 2009.
			Table 6.2 should include a score entry for Objective 3 (EA)	Table 6.2 includes objective 3.	No change.	N/A
			Carry out comparison of Core Strategy objectives and Sustainability Appraisal objectives for geodiversity as well as biodiversity.	Noted, but geological sites currently picked up through SSSIs.	Check that plan addresses geodiversity.	Adopted Core Strategy Policy CS4 now explicitly protects geological assets. Impacts on geological assets to be considered through production of Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document where relevant.
			Amend SA for Objective 7 to include impact of flood defences on biodiversity.	Flood defences will be assessed through their own approval processes. Will be picked up in Appropriate Assessment (AA) also.	To be covered through approval processes and AA.	The Appropriate Assessment of the Core Strategy did not identify likely significant effects from the flood defences.

			It is not clear how the findings of the draft Ipswich SFRA have informed the SA in terms of the proposals to re-use brownfield sites in high risk flood areas (EA)	The SFRA has informed the strategy directly. It identifies areas of risk, and on sites in these areas flood risk is flagged up as an issue that will need satisfactory resolution. ET7 allows flood risk to be factored into the SA.	No change.	N/A
			Any scoring derived from the draft Ipswich SFRA is arguably subjective without the benefit of hazard mapping. (EA)	Noted, however work on the SFRA is ongoing.	Undertake next stage of SFRA work.	Level 2 SFRA was published in 2011.
			Sustainability assessment of the Core Strategy Vision is not provided.	The SA report of the Core Strategy was based on 'A Practical Guide to the Strategic Environmental Assessment Directive' for Office of the Deputy Prime Minister. This requires only a check of the compatibility of the vision and objectives.	No change.	The Core Strategy was adopted December 2011.
			No alternatives provided for sustainability of the Core Strategy objectives.	The SA report of the Core Strategy was based on 'A Practical Guide to the Strategic Environmental Assessment Directive' for Office of the Deputy Prime Minister. It does not require alternatives to be tested.	No change.	The Core Strategy was adopted December 2011.

			Objectives are not grounded in reality.	This comment relates to the Core Strategy rather than the SA.	No change.	N/A
			The sustainability appraisal makes poor reading when dealing with carbon footprint, air quality and sustainable transport – need a policy for this	All these are covered by SA objectives and therefore any policy weaknesses in these areas would be exposed during the next iteration when policy wordings are appraised.	No change.	N/A
			Geodiversity may be harmed as well as biodiversity by objective 3 if housing development coincides with designated sites and wider areas of geodiversity sensitivity / vulnerability.	Noted, but until geological sites have been identified in Ipswich (other than those covered by SSSIs) this will not be possible to assess	Update as geological sites are identified.	Adopted Core Strategy Policy CS4 now explicitly protects geological assets. Impacts on geological assets to be considered through production of Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document where relevant.
			Geodiversity and biodiversity may also be harmed by objective 7 if flood protection necessitates the artificial landforms, which alter fluvial and estuarine landforms and therefore habitat, and also affect the active geomorphological processes that maintain them.	Noted, but this would be an issue for the EIA of specific flood defence proposals. The SA is a strategic document.	No change.	N/A
			The wording of both the title 'links with national policy' and the text 'in the context of national policy' is insufficiently strong and	Disagree. Ultimately this will be tested at examination.	No change.	The Core Strategy was found sound at Examination in 2011.

			fails to address the test of consistency with national policy.			
			Not consistent with national planning policy in proposing new development in Ipswich's waterfront flood risk zones.	National policy as set out in PPS25 does allow development in flood zones in exceptional circumstances particularly in relation to regeneration proposals.	At the sites stage the Council should demonstrate through evidence that it has considered a range of options in conjunction with the flood zone information from the SFRA and applied the Sequential Test, and where necessary the Exception Test, in the site allocation process. This can be undertaken directly or as part of the SA. Where other sustainability criteria outweigh flood risk issues, the decision making process should be transparent with reasoned	The Level 2 Strategic Flood Risk Assessment published in 2011 considers sites, along with a separate note explicitly dealing with the sequential test. Both form part of the Core Document Library reference PCD93 and PCD87 www.ipswich.gov.uk/coredocumentlibrary ¹

¹ Note that the SFRA is now ICD33 and an updated sequential test has now been produced.

					justifications for any decision to allocate land in areas at high risk. The Core Strategy only includes a strategic employment site at this stage.	
			SA should recognise that para 7.52 of the Core Strategy fails to comply with emerging RSS Policy H1.	The RSS housing requirement is a minimum and the Core Strategy states that it will be met.	No change.	The Core Strategy was adopted December 2011.
			Table 6.2 makes no comment in relation to development locations in the context of reducing vulnerability to flooding.	Site specifics will be dealt with through the sites documents.	No change.	N/A
			Comparison of ET7 and objective 7 gives a positive score for aim to protect the town from flooding. This is flawed on the basis that the Ipswich flood defence barrier is neither approved, funded nor built and therefore should not be relied upon in the assessment of flood risk.	The flood barrier would mitigate the risk of flooding and is supported by the Environment Agency which secured the first phase of funding on 25th March 2008, hence the positive score for SA objective ET7.	No change.	The Council published a Level 2 SFRA (2011), and an SPD on development and flood risk is in preparation. Delivery of the Ipswich tidal defences is progressing. A funding contribution has been agreed in principle from Regional Growth Fund.

			SA should identify the risks of flooding in accordance with the preparation of a Strategic Flood Risk Assessment.	A draft SFRA has been prepared and a level 2 report will be prepared in due course.	As above, the Council will need to demonstrate that the SFRA has informed the strategy but this does not necessarily need to be through the SA.	The Council published a Level 2 SFRA (2011), and an SPD on development and flood risk is in preparation. Delivery of the Ipswich tidal defences is progressing. A funding contribution has been agreed in principle from Regional Growth Fund.
7 Policy Alternatives 8 Significant effects, incl. Comments on the policy areas						
43	0	Objectors Environment Agency, GeoSuffolk, Mersea Homes, Crest Nicholson, David Wilson Homes,	Level of detail provided in table 8.1 not provided for alternative options, therefore does not show full justification.	The detailed assessment of the alternative options is presented in Appendix 5 of the SA Report.	Option for including the scoring results for alternative options in the table 8.1 could be considered for clarity.	The table already contains many data therefore it is considered clearer to retain it unamended.
			Scoring is inconsistent and unjustified.	Disagree. Assessment methodology is explained in paragraph 7.2 and in the Table 7.4. Justifications for scoring can be found in Appendix 5 Sustainability Appraisal Tables.	No change.	N/A
			There is a lack of depth displayed in the analysis of key policy areas, leading to superficial or potentially erroneous conclusions.	Disagree. SA is an iterative process so that as more detailed is added to the policy areas, more detailed assessment will be carried out.	No change.	N/A

Policy Area 1 Approach to Sustainable Development						
			A number of policy areas seem to have sustainability that is unjustified.	Justifications are set out in Appendix 5.	No change.	N/A
			ET 2 -It is not clear how carbon neutral developments will “conserve soil resources and quality”.	Policy aims to use the principles of sustainable design when new developments are designed and built. Hence, potentially will contribute to the reduction of soil contamination.	No change	N/A
			ET 7 & 8 -It is not clear how carbon neutral developments will “conserve and enhance biodiversity” and “protect and enhance favourable conditions on SSSIs, SPAs and SACs.	For ET7, the Policy Area clearly reflects the importance of sea level and tidal rises and risk of flooding. Carbon neutral development, in not exacerbating climate change, helps to avoid the negative impacts of that change on biodiversity. See Appendix 5.	No change.	N/A

			<u>Policy Area 2 Location of development</u>			
			ET 7 – Locational principles proposed will directly increase “vulnerability to climatic events and increasing sea levels” to a very strong degree, as this area is already vulnerable to flooding.	There is a reasonable expectation that the flood defences will be completed. Site allocations will be made through subsequent documents and the Council will need to address the requirements of PPS25 in so doing.	No change.	The Council published a Level 2 SFRA (2011), and an SPD on development and flood risk is in preparation. Delivery of the Ipswich tidal defences is progressing. A funding contribution has been agreed in principle from Regional Growth Fund.
			ET 9 – High density development within IP-One will not conserve Ipswich’s sites of historical interest.	The document promotes good design and this is key to how new development fits with historic buildings. Developments would be assessed on their merits against the policy framework.	No change	N/A
			HW 1 – High density focus will not deliver types of homes needed by vulnerable groups of society.	High density is only the focus in the centre and therefore across the Borough, a range of different types of homes would be available to meet a range of needs.	No change	N/A
			HW 2 – Suggested correlation between quality of life where people live and community participation is not explained.	Policy wording clearly aims for open space-based leisure uses to be dispersed throughout Ipswich which would enhance community participation and	No change	N/A

				increase quality of life where people live. See Appendix 5 of SA.		
			ER 1 – No proven correlation between aims to “reduce poverty and social exclusion” and PA2 aims to focus development within IP-One.	See explanation in Appendix 5.	No change	N/A
			ER 2 – No proven correlation between offering everybody the opportunity for rewarding and satisfying employment and PA2 aims to focus development within IP-One.	IP-One is the most accessible part of the town and is a focus for jobs.	No change	N/A
			ER 3 – A strategy which continues to focus on high density city flats will not meet the housing requirements of the whole community.	The strategy allows for other types of development also and in non central locations. Some high density housing means more can be built to meet the housing requirements of the whole community.	No change.	N/A

			Development centred in locations that include the Waterfront includes flood zones and therefore fails to conform to national planning policy.	Where new development is, exceptionally, necessary in areas at risk of flooding, policy aims to make it safe, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.	No change.	The Council published a Level 2 SFRA (2011), and an SPD on development and flood risk is in preparation. Delivery of the Ipswich tidal defences is progressing. A funding contribution has been agreed in principle from Regional Growth Fund.
			Alternative approaches identified do not have evidence presented to demonstrate their viability, or that they can accommodate the necessary minimum levels of housing and other essential development.	This is an issue for the Core Strategy rather than the SA. Evidence base is still being gathered and will be taken on board throughout the process as it becomes available.	No change.	The Core Strategy is now adopted.
		<u>Policy Area 3 Mixed Use Development</u>				
			ET 1 – Correlation is unclear/unproven.	Mixed use developments may reduce the distance people travel to work, hence reducing the travel mileage leading to air quality improvement. See Appendix 5.	No change.	N/A
			HW 1 – Focus on high density will not deliver types of homes needed for vulnerable groups of society.	The focus of Policy Area 3 is Mixed Use Development, not density.	No change.	Densities were reduced in the submission draft of the Core Strategy.

			ER 2 – No proven correlation.	Policy directly promotes opportunities for new employment across Ipswich.	No change.	N/A
			<u>Policy Area 5 Urban Design</u>			
			SA suggests that the preferred option, which sought not to include a specific policy on Urban Design on the basis that such a policy would be a repetition of PPS1, is outscored by Option A which considered the possibility of including such a policy.	The Council will need to justify its approach in the light of SA results. Other objectives, such as not repeating national policy, may have been given more weight.	This may need to be a focus in future iterations if the preferred option is carried forward.	The adopted Core Strategy includes reference to urban design in CS2 and DM5.
			<u>Policy Area 6 Ipswich Policy Area</u>			
			Supports focus on IP-One at the expense of joint working with the other Councils of the IPA.	Disagree. Supports joint working in IPA but not, at this stage, joint DPDs.	No change.	N/A
			ET 1 – Positive correlation unexplained and unclear.	Appendix 5 explains - joint approach could mean better planning for accessibility.	No change.	N/A
			ET 7 – There will be a negative effect on ET7, Sustainability Appraisal suggests no relationship but since IP-One is in a flood risk area, we consider that there is likely to be a strong negative correlation.	Policy Area 6 is about Ipswich Policy Area, not IP-One.	No change.	N/A
			HW 1 -Focus on high density will not deliver types of homes needed by vulnerable groups of	This comment does not relate to HW1.	No change	N/A

			society.			
			ER 1 – Positive correlation is not explained.	Positive correlation is clearly explained in Appendix 5. Joint working may help locate key services/housing to meet needs of people living in border areas.	No change.	N/A
			ER 2 – Positive correlation is not explained.	Positive correlation is clearly explained in Appendix 5. Joint working may help co-locate housing and employment.	No change.	N/A
			ER 3 – No proven correlation and positive correlation is not explained.	There is no positive correlation for this objective. The nature of negative effects is explained in Appendix 5.	No change.	N/A
			ER 4 – Focusing development to the centre of Ipswich taking up existing employment land, is unlikely to lead to sustainable levels of prosperity and growth.	The comment is not relevant to Policy Area 6. However, Policy Area 3 is aiming mixed use development in the centre of Ipswich including employment land which would lead to prosperity and growth.	No change.	N/A
			ER 6 – Focusing development to the centre of Ipswich is likely to lead to congestion which will not lead to	It is evident from Appendix 5 that joint working may help to locate key services/housing in a	No change.	N/A

			efficient patterns of movement and economic growth.	way that reduces traffic.		
			<u>Policy Area 7 Amount of Housing</u>			
			ER 3 – Sufficient land has not been allocated to meet the housing need, therefore this preferred option cannot be assessed as meeting this policy objective.	The Core Strategy does not allocate land other than the strategic sites.	No change.	The Site Allocations DPD incorporating the IP-One plan will allocate sites for development.
			<u>Policy Area 8 Balance between Flats and Houses</u>			
			ET 1 – Positive correlation is unexplained and unclear.	Appendix 5 explains.	No change.	N/A
			ET 6 – Positive correlation is unexplained and unclear.	Appendix 5 explains.	No change.	N/A
			ET 7 – SA suggests a weak negative relationship but since the majority of housing is being planned at high densities in a high flood risk area, there is likely to be a correlation to a very strong negative degree.	Where new development is, exceptionally, necessary in areas at risk of flooding, policy aims to make it safe, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. Have therefore shown weak negative relationship because ground floor may not be inhabited.	No change.	N/A

			HW 1 -Focus on high density will not deliver types of homes needed by vulnerable groups of society.	This comment is not relevant to HW1.	No change.	N/A
			ER 1 – Positive correlation is not explained.	Appendix 5 explains. Location of high density development at key service centres would reduce social exclusion.	No change.	N/A
			ER 2 – Positive correlation is not explained and the policy area aims to focus development of housing on high density sites which will result in the loss of much employment land.	Appendix 5 explains. Service centres offer jobs.	No change.	N/A
			ER3 – A strategy that continues to focus on high density flats will not meet the housing requirements of the whole community.	The strategy allows for other types of development also and in non central locations. Some high density housing means more can be built to meet the housing requirements of the whole community.	No change.	N/A
			ER 4 – Focusing development to the centre of Ipswich taking up existing employment land, is unlikely to lead to sustainable levels of prosperity and growth.	The comment is not relevant to Policy Area 8. However, Policy Area 3 is aiming mixed use development in the centre of Ipswich including employment land which would lead	No change.	N/A

				to prosperity and growth.		
			ER 6 – Focusing development to the centre of Ipswich is likely to lead to congestion which will not lead to efficient patterns of movement and economic growth.	Higher density of housing around service centres may reduce trip generation.	No change.	N/A
			Policy is predicated on the suitability of a housing trajectory which is almost entirely dependent on the delivery of a disproportionately high balance of apartments.	The Core Strategy approach allows for a mix of densities (and dwelling types) according to location.	No change.	N/A
			SA fails to acknowledge considerable property market and the particular problems of oversupply in Ipswich.	The Council is currently conducting a SHMA which will provide more evidence about the housing market.	Ensure plan responds to SHMA findings.	The SHMA was published in 2008 to inform the Core Strategy and the latest update is dated 2012.
			Should have been informed by a SHMA	A SHMA is underway but not yet complete. It will be factored in at the next stage.	No change.	The SHMA was published in 2008 to inform the Core Strategy and the latest update is dated 2012.

			A number of sites for high density flats fall within flood risk zones and will need to be reconsidered in light of a sequential approach.	The Core Strategy does not generally allocate sites. Sites documents will consider site specific flooding issues.	No change.	The Level 2 Strategic Flood Risk Assessment published in 2011 considers sites, along with a separate note explicitly dealing with the sequential test. Both form part of the Core Document Library reference PCD93 and PCD87 www.ipswich.gov.uk/coredocumentlibrary ²
			<u>Policy Area 9 Residential Density</u>			
			Negative side of higher density development is not examined. Appraisal is overly simplistic and unbalanced, leading to exaggerated conclusion.	Policies do not act in isolation – thus high density development would be well designed and low carbon, etc.	No change.	N/A
			ET 1 – Positive correlation is unexplained and unclear.	Explained in App 5. High density developments may reduce the distance people travel to work, hence reducing the travel mileage leading to air quality improvement.	No change.	N/A

² 2015 update – Please note that the SFRA is now ICD33 and an updated sequential test has now been produced.

			ET 6 – Positive correlation is unexplained and unclear.	Explained in App 5. The use of Combined Heat and Power (CHP) schemes is more viable in high density developments. Hence, this Policy Area indirectly promotes the use of sustainable energy resources, diversion from fossil fuels and consequently reduces contributions to climate change.	No change.	N/A
			ET 7 – SA suggests a weak negative relationship but since the majority of housing is being planned at high densities in a high flood risk area, there is likely to be a correlation to a very strong negative degree.	Not relevant for this Policy Area 9.	No change.	N/A
			HW 1 - A focus on high density will not deliver types of homes required for healthy living for vulnerable groups of society.	Comment is not relevant to objective.	No change.	N/A
			ER 3 – A strategy that continues to focus on high density flats will not meet the housing requirements of the whole community.	The strategy allows for other types of development also and in non central locations. Some high density housing means more can be built to meet the housing requirements of the whole community.	No change.	N/A

			<u>Policy Area 10 Previously Developed Land</u>			
			ET 1 – Positive correlation is unexplained and unclear.	Appendix 5 explains.	No change.	N/A
			ET 7 – Since the majority of housing is being planned at high densities in a high flood risk area, there is likely to be a correlation to a very strong negative degree.	ET7 has a negative score to reflect the fact that much PDL may be in flood risk zones. As stated previously, where new development is, exceptionally, necessary in areas at risk of flooding, policy aims to make it safe, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.	No change.	The Level 2 Strategic Flood Risk Assessment published in 2011 considers sites, along with a separate note explicitly dealing with the sequential test. Both form part of the Core Document Library reference PCD93 and PCD87 www.ipswich.gov.uk/coredocumentlibrary ³
			ET 9 – It is not clear how high density brownfield redevelopment is directly correlated with preserving sites of historic interest.	Appendix 5 explains.	No change.	N/A
			HW 1 – Maintaining a focus on developments on brownfield sites will not deliver the type of low density homes required for healthy living.	Policy Area 10 is not about density.	No change.	N/A
			ER 1 – Positive correlation is not explained.	Appendix 5 explains.	No change.	N/A

³ 2015 update – Please note that the SFRA is now ICD33 and an updated sequential test has now been produced.

			ER 3 – A strategy that continues to focus on high density flats will not meet the housing requirements of the whole community.	Policy Area 10 is not about density.	No change.	N/A
			ER 6 – Focusing development to the centre of Ipswich is likely to lead to congestion which will not lead to efficient patterns of movement and economic growth.	Appendix 5 explains that previously developed land is likely to be closer to existing services than new greenfield sites, reducing journeys.	No change.	N/A
			<u>Policy Area 11 Greenfield Land</u>			
			ET 1 – Analysis presented demonstrates a complete lack of understanding as to the principles of development in the Northern Fringe and an ignorance of the volumes of technical information that have been submitted in support of this location in the past.	This is an SA of a strategic document and does not look in detail at site-specific matters. This is for the sites documents to deal with.	No change.	N/A
			ET 1 -An analysis that presents one wrong conclusion for Option A and provides no equivalent assessment of the other 3 Options, is wholly unacceptable.	Alternative 1 potentially could increase the distance of journeys to main services and negatively affect air quality, but use of the train could mitigate this effect. Only this alternative positively allocates the land for	No change.	N/A

			before 2021.			
			ET 1-Delaying or preventing development of the northern fringe will result in a higher concentration of development in the central Ipswich area.	Noted. The Core Strategy objectives deal with this in Objective 4.	No change.	N/A
			ET 1 – Analysis does not reflect the potential negative effect on local air quality caused through high levels of new development and increased urbanisation in central areas.	Proximity principle of locating the developments next to the main services potentially will reduce the use of car and encourage more sustainable modes of transport.	No change.	N/A
			ET1 – All new housing across the borough will generate travel demand	Mode of travel is likely to vary according to location.	No change.	N/A
			ET 2 – Cannot see any logic in different approaches to the three options as they all relate to an area of greenfield land, any difference relates to the timing not the impact.	The preferred option says land will only be used in future if needed, implying that it may not be. Thus it is not necessarily just about timing.	No change.	N/A
			ET 2 – In seeking to defer such an allocation until post 2021 the soundness of the Core Strategy is risked and also the impact of development in central areas is exacerbated.	This is a Core Strategy matter rather than one for the SA and ultimately will be considered at the examination.	No change.	N/A

			ET 2 – Reference should have been made to the agricultural land reports in respect of the land east and west of Westerfield Road	PPS7 does not give agricultural land absolute protection.	No change.	N/A
			ET 3 – Option A results in no more new housing than any of the other options.	Noted, but there may be a relationship between house/household size and waste generation. Northern fringe dwellings would be more likely to be larger and lower density than in central locations.	No change.	N/A
			ET 3 – Amount of waste per household post - construction would not be greater in the Northern Fringe than anywhere else.	As above, there may be a relationship between house/household size and waste generation. Northern fringe dwellings would be more likely to be larger and lower density than in central locations.	No change.	N/A
			ET 4 – The Northern Fringe offers excellent potential for reducing traffic generation in new development and the environmental effects of traffic generation from excessive urban intensification would be more harmful.	The Northern Fringe is further from existing services which would potentially increase the distance of journeys to be made by car.	No change.	N/A

			ET 5 – SA presents no analysis of the Northern Fringe’s potential for increased access to services and the urban concentrations strategy decreasing access to services.	The distance between Northern Fringe and the services will reduce its potential to increase access.	No change.	N/A
			ET 6 – The analysis repeats the mistaken belief that the Northern Fringe results in more housing.	Housing here is likely to be lower density forms, which are inherently less efficient than e.g. flats.	No change.	N/A
			ET 6 – Opportunity for energy efficiency savings offered in the Northern Fringe is ignored.	As above, housing here is likely to be lower density forms, which are inherently less efficient than e.g. flats.	No change.	N/A
			ET 7 – Since the majority of housing is being planned at high densities in a high flood risk area, there is likely to be a correlation to a very strong negative degree.	ET7 has a negative score to reflect the fact that much PDL may be in flood risk zones. As stated previously, where new development is, exceptionally, necessary in areas at risk of flooding, policy aims to make it safe, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.	No change.	The Level 2 Strategic Flood Risk Assessment published in 2011 considers sites, along with a separate note explicitly dealing with the sequential test. Both form part of the Core Document Library reference PCD93 and PCD87 www.ipswich.gov.uk/coredocumentlibrary ⁴

⁴ 2015 Update – Please note that the SFRA is now ICD33 and an updated sequential test has now been produced.

			ET 7 – Rather than a positive for Option A, a more accurate analysis would be a negative entry for the other Options and a double negative for Option C.	ET7 has a negative score to reflect the fact that much PDL may be in flood risk zones. As stated previously, where new development is, exceptionally, necessary in areas at risk of flooding, policy aims to make it safe, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.	No change.	The Level 2 Strategic Flood Risk Assessment published in 2011 considers sites, along with a separate note explicitly dealing with the sequential test. Both form part of the Core Document Library reference PCD93 and PCD87 www.ipswich.gov.uk/coredocumentlibrary
			ET 8 – Would expect the biodiversity of the Northern Fringe to be enhanced as a result of the development and the current negative for option A should be neutral if not positive.	It is possible, but the comment about protected species still stands.	No change.	N/A
			ET 8 – Suggestion that land would remain derelict for Option B highlights a lack of knowledge of the area.	Clearly the area is farmland rather than 'derelict' but positive short term biodiversity impacts could still result e.g. from preservation of the hedgerows under Option B, or if the land is left fallow for years preceding its development.	Amend reference to dereliction in future work.	Amended.

			ET 8 – Sweeping assertion that brownfield sites have greater biodiversity potential than greenfield sites.	Noted. Site-specific study would be required at the site allocations stage.	No change.	N/A
			ET 9 – Available evidence suggests the complete opposite of that set out in the SA and Option C would result in greater levels of development in the areas of greatest archaeological sensitivity.	Value generated through development in central areas could help in the conservation of historic sites that otherwise could deteriorate. Site-specific assessment would be required at the site allocations stage.	Archaeological information to be examined at next stage of site allocations plan preparation.	Noted, however the SA will be strategic, not as detailed as an EIA.
			ET 10 – Lack of broader perspective on impacts and a concentration only on the landscape rather than the townscape impacts of the alternatives.	This objective equally takes into consideration importance of the landscape and townscape impacts of the alternatives.	No changes.	N/A
			ET 11 – Unsure why the appraisal records a zero impact against the Preferred Option but not in relation to any of the other options.	ET 11 does not apply to other Options.	No change.	N/A
			HW 1 – No analysis is presented, would expect at least rudimentary analysis albeit the conclusion may well be that there are no differences between the options.	Health and quality of life issues would be dealt with through the sites document.	No change.	N/A

			HW 1 – Not providing a housing site on the Northern Fringe will make the delivery of low density homes with gardens harder which will mean a failure to provide suitable housing for those most in need.	Low density housing with gardens is not by definition healthier than medium or high density housing. Suitability to the end user and good design are more important factors.	No change.	N/A
			HW 2 – No analysis is presented. The Northern Fringe maximises the ability of the plan to provide the quantum and quality of housing and therefore has a greater positive impact than the other Options.	This could apply anywhere. There is insufficient information to make an assessment at this stage – this would need to be looked at as the policy approach is developed further.	No change.	Subsequent iterations of SA looked further at Northern Fringe options - e.g. update published in July 2011.
			ER 1 – Analysis is incorrect as Northern Fringe is likely to result in a real increase in the delivery of affordable housing compared to the alternative not just providing more housing at lower prices.	Northern Fringe has a positive score.	No change.	N/A
			ER 2 – Logically exactly the same negative impacts arise from the preferred strategy and Option B as Option C.	Alternative 3 is the only one that is not about allocating land (and providing certainty), hence the different approach.	No change.	N/A
			ER 2 – SA analysis identifies the problem but fails to accurately reflect this in the analysis of the Preferred Option and	Again, the main impact identified is around uncertainty after 2021.	No change.	N/A

			Option B, or address the significance of the issue.			
			ER 3 – Points broadly in the right direction of the relative merits of the Northern Fringe, but fails to complete the analysis in respect of the Preferred Option and Option B, which have a short-medium term negative impact by failing to maximise housing choice.	Preferred strategy includes a mix of densities and dwelling types therefore choice is provided for in preferred option also. Positive score for Alternative 1 relates specifically to housing needs in northern Ipswich.	No change.	N/A
			ER 3 – A strategy that continues to focus on high density flats will not meet the housing requirements of the whole community.	The strategy allows for other types of development also and in non central locations. Some high density housing means more can be built to meet the housing requirements of the whole community.	No change.	N/A
			ER 4 – The analysis needs correcting to reflect the relative adverse effects of the Preferred Option and Option B.	Again, alternative 3 is the only one that is not about allocating land (and providing certainty), hence the different approach.	No change.	N/A
			ER 5 – No material difference in the impact of the four options in this respect.	Preferred option and option 3 promote this objective by focusing more development in the town centre.	No change.	N/A

			ER 6 – Overly simplistic and broadly misrepresentative stance on the transport strategy for North Ipswich.	The basic finding is that this location is more 'remote' from jobs and services than central ones and therefore more likely to be car dependent.	No change.	N/A
			ER 9 – The deferral of the Northern Fringe substantially increases the pressure on the loss of existing indigenous employment opportunities.	Should say ER7? Encouraging investment is about site quality as well as quantity.	No change.	N/A
			CD1 – There is no suggestion that the area will be left derelict, therefore the negative recorded against Option B is completely unwarranted.	Agree that the land is not currently derelict. However, it is possible there could be antisocial behaviour issues if the land ceased to be farmed/actively managed in the years preceding development and became more overgrown.	Amend reference to dereliction in future work.	Amended.
			Authors of the document seem to have very little knowledge of the proposals for North Ipswich.	This Core Strategy appraisal is of strategic options. More detailed appraisal for any allocations would be carried out at the site allocations stage through the IP-One and Site Allocation DPDs.	No change.	Subsequent iterations of SA looked further at Northern Fringe options - e.g. update published in July 2011.

			Analysis draws false conclusions as it appears to start from the premise that development in the Northern Fringe would be in addition to the 15,400 units for Ipswich overall.	Confirm that this was not the premise of the assessment.	No change.	N/A
			Significant inconsistencies between the treatment of preferred option and options 1 & 2.	Disagree. The main focus of this assessment was how developing greenfield land would impact on objectives.	No change.	N/A
			Failure to properly identify the benefits of allocating development at the Northern Fringe.	Allocating development at the Northern Fringe has its benefits and disadvantages at the same time – as shown in Appendix 5.	No change.	N/A
			Failure to take into account the adverse consequences arising from not allocating the Northern Fringe in terms of the impact of development elsewhere.	Consequences are appraised through assessment of preferred option.	No change.	N/A
			Starting point of taking the housing requirements and housing supply given is incorrect when taking into account the actual requirements of PPS3 / East of England Plan and the suitability and deliverability of a number of the proposed allocations.	An urban capacity study has been carried out and a SHLAA will be prepared in due course to check deliverability issues.	Reflect SHLAA findings, when available, in future work on the plan.	The SHLAA published in 2010 looked at site deliverability.

			Only 4 sustainability indicators out of 22 receive any comment.	This is because the preferred option is not to develop, as opposed to alternative 1 which is to develop now.	No change.	N/A
			Process has failed to be informed by the necessary evidence base including a SHMA and a SHLAA.	Evidence base is still being gathered and will inform policy development.	No change.	The SHMA was published in 2008 to inform the Core Strategy and the latest update is dated 2012. A SHLAA was published in 2010. Work to expand and update the evidence base is ongoing.
			Appraisal of alternative options is inconsistent.	Consider that the assessment is consistent.	No change.	N/A
			SA should provide a fair and balanced appraisal of all reasonable options, recognising that some factors are site specific and that others do not relate to geography.	The SA does provide this and this is reflected in the comments above, e.g. where it is stated that some matters will need to be looked at further at the site-specific stage.	No change.	N/A
			<u>Policy Area 12 Gypsies & Travellers</u>			
			Ignores reason why preferred option does not identify sites for travellers.	Reasons are explained in the Preferred Policy.	No change.	N/A
			Out of 22 indicators, only 2 receive any sort of analysis.	The rest of the objectives are considered to be not applicable to this	No change.	N/A

			Policy.			
			Disagree that a site for travellers within the built up area of Ipswich or upon its undeveloped fringe would have no townscape or landscape impact.	Noted but design and landscaping requirements would apply to any site. No site is identified at this stage – this is a strategic level assessment.	No change.	N/A
			<u>Policy Area 13 Residential Tariff</u>			
			Correlations unclear. Planning gain tariff approach does not have any more positive correlations with the Sustainability Objectives than any alternative approach. Existing approach may be more sustainable as it relates to each development site, addressing local needs.	Appendix 5 explains correlations. SA informs policy choices and other factors may come to bear – e.g. tariff offers greater certainty and transparency.	No change.	N/A
			<u>Policy Area 21 Green Corridors</u>			
			The appraisal against objective ET10 shows a blank score. It must surely be the case that a policy on Green Corridors will lead to a strong positive position on the conservation and enhancement of the quality and local distinctiveness of the Ipswich townscape (EA)	The Preferred Policy Approach should score positively because it directly promotes this objective, whilst other Options do not contribute to this objective.	Ensure this is picked up in future work.	Green Corridors are addressed in Core Strategy policy CS16 which scored positively against objective ET10.

<u>Policy Area 23 Strategic Flood defence</u>					
		High risk strategy to plan the delivery of the majority of Ipswich's new homes within IP-One in advance of the delivery of the SFD.	Repeats points made above (e.g. see Policy Areas 2, 11 and Section 6).	No change.	The Council published a Level 2 SFRA (2011), and an SPD on development and flood risk is in preparation. Delivery of the Ipswich tidal defences is progressing. A funding contribution has been agreed in principle from Regional Growth Fund.
		ET2 – Positive correlation is unjustified and unclear.	Appendix 5 explains.	No change.	N/A
		ET 7 – Even with delivery of the SFD, development in flood zone should not be promoted, as it is unsustainable.	The wording of this policy option addresses the importance of the Strategic Flood Defence and suggests mitigation measures e.g. phasing.	No change.	The Council published a Level 2 SFRA (2011), and an SPD on development and flood risk is in preparation. Delivery of the Ipswich tidal defences is progressing. A funding contribution has been agreed in principle from Regional Growth Fund.
		ER 3 – A strategy that continues to focus on high density flats will not meet the housing requirements of the whole community.	The strategy allows for other types of development also and in non central locations. Some high density housing means more can be built to meet the housing requirements of the whole community.	No change.	N/A

			SA fails to recognise the significance of flood risk as a key tenet of national planning policy.	Comments above deal with this issue.	No change.	N/A
			Since the draft SFRA fails to undertake breach analysis a precautionary approach would be expected.	The SFRA will be updated in due course. The council will have regard to PPS25 in preparing the strategy.	No change.	The Level 2 Strategic Flood Risk Assessment published in 2011 considers sites, along with a separate note explicitly dealing with the sequential test. Both form part of the Core Document Library reference PCD93 and PCD87 www.ipswich.gov.uk/coredocumentlibrary ⁵
		<u>Policy Area 29 Flooding and SUDS</u>				
			The draft SFRA is incomplete and fails to provide adequate basis for assessing flood risk.	It is a draft but it provides a basis for assessing risk.	No change.	The Level 2 Strategic Flood Risk Assessment published in 2011 considers sites, along with a separate note explicitly dealing with the sequential test. Both form part of the Core Document Library reference PCD93 and PCD87 www.ipswich.gov.uk/coredocumentlibrary ⁶
		<u>Policy Area 31 Protecting Our Assets</u>				
			PA 31 – Suggested wording: Proposals for the loss of a recognised asset – even if only locally recognised – will be resisted unless an equivalent of equal, or better quality is first provided, or acceptable mitigation measures are put in place.	This comment is more pertinent to the Core Strategy itself than the SA.	No change.	Adopted Core Strategy included policy DM31 Conserving Local Natural and Geological Interest, which referred to 'no net loss' of interest.

⁵ Note that the SFRA is now ICD33 and an updated sequential test has now been produced.

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			<u>Policy Area 38 Affordable Housing</u>			
			Proposals for affordable housing policy have been undertaken without reference to a Strategic Housing Market Assessment and cannot therefore be considered robust.	A SHMA is under preparation.	Use SHMA to inform policy development in due course.	The SHMA was published in 2008 to inform the Core Strategy and the latest update is dated 2012.
			Predominance of allocations for apartments would not reflect a demand for affordable family housing stock.	A range of housing types, densities and locations is provided for under the preferred option. The Core Strategy does not allocate sites other than the strategic employment site.	No change.	N/A
			Failure to recognise the significance of flood risk as a determinant in the delivery of affordable housing.	Policy focuses on affordable housing targets and thresholds.	No change.	N/A
Section C Core Strategy						
10 Mitigation measures						
1	0	Objectors Mersea Homes	Wholly inappropriate that mitigation of flood risk consists only of mentioning the need for a flood-risk sensitive design prior to completion of the tidal barrier, an outcome which itself is uncertain (Recommendation 3).	Phasing to follow flood defences also mentioned in Appendix 5. Final policies will need to have regard with PPS25 compliance and will be considered at examination.	No change.	The Level 2 Strategic Flood Risk Assessment published in 2011 considers sites, along with a separate note explicitly dealing with the sequential test. Both form part of the Core Document Library reference PCD93 and PCD87 www.ipswich.gov.uk/coredocumentlibrary ⁷

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Section D Site Allocations and Policies						
			Negative score for site UC186 confirms contention that the potential impact of the proposed residential development on the St Clements Golf Course Wildlife Corridor is a major constraint. Unlikely that a statement about conditions of development could offer any form of protection in the manner suggested. (EA)	The SA acknowledges that developing the site could have adverse impacts on landscape character. It goes on to suggest ways to mitigate adverse impacts.	No change.	N/A
			A number of the proposed allocations appear to perform poorly and yet none have been discounted on that basis.	Most development will have some level of environmental impact. The SA process enables it to be identified and where possible suggests ways to minimise or mitigate impacts.	No change.	N/A
			The SA does not contain any attempt at an appraisal of sites put forward by objectors during earlier rounds of consultation.	A small number of sites were not appraised, because of policy or use constraints to their allocation, e.g. woodland at Birkfield Drive.	No change.	N/A

Section E IP-One Area Action Plan						
			There is no separate analysis of the individual site allocations.	The IP-One sites were assessed together under the relevant Policy Area (e.g. housing sites under Policy Area 47). As urban brownfield sites they share many characteristics. However, a more detailed site level appraisal will be undertaken before any formal allocations are made.	Undertake more detailed appraisal of sites to inform allocations. The SA will be strategic, not to the level of detail used for an environmental impact assessment.	N/A
			Confusion over why such a different approach has been taken for the assessment of the IP-One allocations compared to non IP-One.	The IP-One sites were assessed together under the relevant Policy Area (e.g. housing sites under Policy Area 47). As urban brownfield sites they share many characteristics. However, a more detailed site level appraisal will be undertaken before any formal allocations are made.	Undertake more detailed appraisal of sites to inform allocations. The SA will be strategic, not to the level of detail used for an environmental impact assessment.	N/A
			Assessment of sites en masse is not a sufficiently robust approach.	The IP-One sites were assessed together under the relevant Policy Area (e.g. housing sites under Policy Area 47). As urban brownfield sites they share many characteristics. However, a more detailed site level appraisal will be undertaken before any formal allocations are made.	Undertake more detailed appraisal of sites to inform allocations. The SA will be strategic, not to the level of detail used for an environmental impact assessment.	N/A

			Little to be gained from SA as it neither verifies nor provides meaningful assessment of the site allocation strategy.	The SA identifies the general 'high level' impacts likely to arise from allocating sites - such as increased traffic.	No change.	N/A
			No alternative approach considered for PA47 therefore the policy has not been fully tested	The SA assesses different approaches to the mix of uses.	No change.	N/A
			It is not clear how the two alternative approaches for site UC057 relate to the preferred policy of 30% B1.	The SA appraises 50% residential and 50% non-residential on site UC057.	No change.	N/A
			Table 18.2 – preferred policy is not backed up by a thorough sustainability appraisal and does not satisfy soundness test iv and vii of PPS12.	Table 18.2 is simply the scores for the SA which, taken in isolation, only serve to flag up potential problems with policy areas - the whole SA report does provide a proper assessment.	No change.	N/A
Section F Appendices						
			Appendix 6 - Score given to site UC035 is incorrect. Instead of -3 it should be +5.	The site is not being allocated.	No change.	N/A