



By Email

Our Ref:

UA006314-01

2 September 2014

Dear Sir/Madam

Sustainability Appraisal (SA) Scoping Update Consultation: Ipswich Core Strategy and Site Allocations Development Plan Documents

In October 2013 we consulted on the scope of SAs for the Ipswich Site Allocations Development Plan Documents (DPDs) and the Focused Review of the adopted Core Strategy. Whilst significant SA work has been undertaken on both plans since this time, the scope of these plans has since changed. As such we are updating the SA work to reflect these changes. This letter provides an update to our scope and approach to the SAs of the two plans for your comment.

Background and Reasons behind Core Strategy Whole Plan Review and Site Allocations DPD Update

Public consultation was undertaken (under Regulation 18) on the two draft development plan documents between January and March 2014. The Core Strategy at this stage was published as a focused review, but the Council has now been advised that the extent of changes proposed amounts to a full review. The plan updates housing and employment numbers and allocates all the land at the Northern Fringe for the Ipswich Garden Suburb development, allowing more of it to come forward sooner. Therefore, the Council is reviewing the whole Core Strategy document to 2031 alongside the emerging Site Allocations plan and intends to move to the next stage of plan preparation (Regulation 19 consultation) on this basis.

A benefit of the Core Strategy whole plan review is that Ipswich Borough Council can now consolidate the general development management (DM) policies into Part C of the Core Strategy rather than including them within the Site Allocations DPD. This would benefit plan users by leaving just the site allocations policies and IP-One opportunity areas in the Site Allocations DPD. There would also be other smaller changes to the Core Strategy and the Site Allocations DPDs that would need to be considered.

Consequences for the SA of the changes to the Core Strategy and Site Allocations DPDs

Due to the changes outlined above we are revising and issuing (for consultation) the SA of the whole Core Strategy and the SA of the Site Allocations DPD to ensure they reflect the latest versions of the plans. These new SAs will supersede the SA of the Core Strategy (which was adopted in December 2011), the SA of the Core Strategy Focused Review and the SA of the Site Allocations DPD (consulted upon January-March 2014).

We recognise that in addition to appraising the revised Core Strategy, the SA will need to incorporate an updated evidence base and give more detailed consideration to alternative spatial options.

Proposed Scope of the SA for the Whole Plan Core Strategy Review

The proposed scope of the SA of the Whole Plan Core Strategy Review would include:

- A new SA Report (and Non-Technical Summary) to reflect the whole revised Core Strategy (and previous consultation comments where relevant) for submission;

- Updated evidence base, baseline, issues in the borough and plans review;
- More detailed consideration of alternative spatial options;
- Updated assessment, mitigation and monitoring strategy, and
- Updated SA Framework to account for comments received during previous consultation.

Where appropriate we would seek to draw upon previous work, although it is evident this would be a new standalone SA Report to replace the previous versions. The key anticipated changes to the Core Strategy include:

- Inclusion of DM policies from the Site Allocations DPD; and
- A number of other small policy amendments.

Proposed Scope of the SA for the Site Allocations DPD

The proposed scope of the SA update of the Site Allocations DPD would include:

- A refreshed SA Report (and Non-Technical Summary) to reflect the revised Site Allocations DPD (and previous consultation comments where relevant) for submission;
- Updated evidence base, baseline, issues in the borough and plans review;
- Updated assessment to reflect the removal of DM policies and amendments to sites, and
- Updated SA Framework to account for comments received during previous consultation.

We would use the existing SA Report as a basis for our 'refresh'. The key anticipated changes to the Site Allocations DPD include:

- Removal of the DM area-based policies;
- Removal/amendment of some site allocations; and
- A number of other small amendments.

Revised SA Framework

No changes have been made to the headline SA objectives since those made as a result of the SA Scoping Consultation undertaken in October 2013. However, a number of suggestions were made to improve the SA Framework during the consultations on the SA Reports. Recommendations are provided in the paragraphs below along with a response as to whether or not the recommendation was taken on board:

- **Comment:** To add an indicator into existing SA Objective ET1 'to improve air quality' to measure congestion as the main cause of air pollution.
Response: Congestion is not monitored by the Council, therefore it was not deemed appropriate to include. Air quality itself, aspects of which are monitored, is considered the more appropriate measure and is already included as an indicator.
- **Comment:** To add a sub-objective into SA Objective ET2 'to conserve soil resources and quality' stating whether development will harm soil resources / quality.
Response: The consideration of harm will be inherent to the appraisal of this objective and therefore it is not considered necessary to include as a sub-objective.
- **Comment:** To include the following additional indicators within SA Objective HW1 'to improve the health of those most in need': Levels of physical activity; and GP registrations for depression.
Response: We will identify appropriate indicators relating to physical activity and well-being.
- **Comment:** To add a sub-objective into SA Objective ER1 'to reduce poverty and social exclusion' stating 'would development improve existing areas of deprivation?'

Response: We will include the sub-objective 'would the proposals benefit LSOAs that exhibit high levels of deprivation?'

- **Comment:** To include additional indicators within SA Objective ER2 'to offer everybody the opportunity for rewarding and satisfying employment' regarding the number of long term unemployed and average wage.

Response: Additional indicators relating to unemployment and average earnings will be included.

- **Comment:** To include an additional indicator within SA Objective ER3 'to help meet the housing requirements for the whole community' stating the number of privately rented houses falling below EPC rating 'E'.

Response: This indicator has not been included as it is not considered it would add greatly to the SA assessment and the resources required to monitor it are not available.

Updated Evidence

As part of the SA work outlined in the paragraphs above we intend to update the evidence base within both SA Reports, including a refresh of the baseline information, key issues within Ipswich and the plans review. You will already have seen a relatively recent update to these in the January-March 2014 consultations. These will be reviewed and updated again as appropriate.

Timescales

The current timescales for preparing the two plans are as follows:

- Consultation on the draft plans for eight weeks over November 2014 to January 2015.
- Process representations and consider the need for any modifications January - February 2015.
- Submit to Inspector 26th March 2015.

In accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, we are seeking the views of the Consultation Bodies on the changes in scope and the level of detail of the SAs. The Regulations require this scoping update is made available for a period of five weeks. Please would you therefore return any comments you wish to make to us by Tuesday 7th October. Comments received prior to this date would be greatly appreciated. Comments can be submitted by:

Post: to the Town Planning Manager, Town Planning Department, Development and Public Protection, Ipswich Borough Council, 15-17 Russell Road, Ipswich, IP1 2DE, or

Email: planningandregeneration@ipswich.gov.uk

If you require any further information please do not hesitate to contact me.

Yours sincerely



David Hourd
Technical Director

