

Appendix 1

Statement of Community Involvement (SCI) Review - Consultation Statement

In June 2017 the Council published an Ipswich local plan newsletter which invited views on the effectiveness of techniques used by the Council to engage the public and other interested parties in the planning process. The comments received are shown below together with the Council's response:

| Section | Respondent | Comment | Council Response | Action |
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| N/A | Natural England | <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.</p> <p>We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals.</p> <p>We now ask that all planning consultations are sent electronically to the central hub for our planning and development advisory service at the following address: consultations@naturalengland.org.uk. This system enables us to deliver the most efficient</p> | Refer to https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals . | Update Natural England's details on the consultation database. |

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| | | and effective service to our customers. | | |
| N/A | Historic England | <p>Thank you for consulting Historic England on the Ipswich SCI Involvement (SCI) Review. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. This consultation deals with the Council's updated approach to public consultation for planning policies and planning applications. These requirements are set out in legislation in the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011), Town and Country Planning (Local Development) England Regulations 2004, the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Neighbourhood Planning (General) Regulations 2012 (as amended).</p> <p>We support the general aims and approach to the draft SCI. We request that in Appendices 1 and 2, that our name is changed from English Heritage to the more up-to-date Historic England.</p> <p>With regards to neighbourhood planning, we would welcome notification of proposed neighbourhood planning areas as well as consultation on draft plans. The regulations state that Historic England should be consulted on draft plans where our interests are considered to be affected, but we would also welcome early notice of proposed neighbourhood areas. We have guidance on neighbourhood planning, which can be found at: www.english-heritage.org.uk/caring/get-</p> | Noted. | Update Historic England's details on the consultation database. |

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| | | <p>involved/improve-your-neighbourhood/ http://www.english-heritage.org.uk/caring/get-involved/improve-your-neighbourhood/</p> <p>We would welcome consultation at an informal level, in addition to the requirements of the legislation, where issues may benefit from our early involvement.</p> | | |
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A further six week formal consultation exercise from Thursday 9th November until Thursday 21st December 2017 was undertaken to gather views from local people on the proposed changes to the SCI. The comments received are shown below together with the Council's response:

| Section | Respondent | Comment | Council Response | Action/Amendments to the SCI |
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| N/A | Kathy Bole Councillor Suffolk County Council Whitton and Whitehouse | <p>I would like to know more about how the SCI sets out the method of consultation on disability and access issues?</p> <p>There does not appear to be an indication as to which organisations or consultant bodies are used to provide this perspective and/or advice. How often is there a review of those organisations?</p> <p>How are such bodies/organisations chosen, how are they invited to engage etc.</p> <p>Are these organisations local to Ipswich?</p> <p>How is this arrangement reviewed to ensure that the organisations are truly representing the views of those with a range of disabilities?</p> <p>What happened to the former ACCESS panel that IBC</p> | <p>Government regulations relating to the preparation of a local plan require that certain minimum standards should be met for consulting on a pre-submission local plan (regulation 18). These regulations make reference to such general consultation bodies as the local planning authority consider appropriate. General consultation bodies include bodies which represent the interests of disabled persons in the local authority's area. The Ipswich local plan mailing list to whom all notifications on consultations</p> | <p>Approach disability groups and invite them to join the Council's consultation database.</p> |

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| | | <p>used to have and if it still exists, how are disabled people currently engaged with?</p> | <p>are sent includes Headways Suffolk and East Suffolk MIND.</p> <p>Anyone can join the local plan mailing list.</p> <p>The local plan mailing list is reviewed towards the end of every local plan cycle. All consultees are contacted to ask whether they would like to remain on the database and any inactive contacts are removed.</p> <p>The ACCESS Panel no longer operates. It was superseded by the Equality Panel, which covers a wider range of interests. The Equality Panel has been engaged with previously on certain local plan documents. This may be appropriate again in the future, but will depend on the subject matter of the document and the availability of meetings, which are quarterly.</p> | |
| N/A | Natural England | <p>We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and</p> | <p>Refer to https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals.</p> | <p>No change required to the SCI.</p> |

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| | | <p>participating in the process of determining planning applications.</p> <p>We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals.</p> <p>We now ask that all planning consultations are sent electronically to the central hub for our planning and development advisory service at the following address: consultations@naturalengland.org.uk. This system enables us to deliver the most efficient and effective service to our customers.</p> | <p>Natural England's details have been updated on the consultation database.</p> | |
| <p>Appendix 2, page 19</p> | <p>Suffolk Fire and Rescue Service (SFRS)</p> | <p>The Ipswich local plan needs to establish a framework which creates 'safe and accessible environments' (as set out in paragraph 69 of the NPPF). Fire safety is a relevant consideration, in respect of infrastructure needs, access by services to new development and water supply.</p> <p>Suffolk Fire and Rescue Service (SFRS) undertakes an Integrated Risk Management Plan (IRMP) every 3 years to evaluate the risks within our area and our response to them. Any large scale development would also be evaluated at the planning application stage. At the present time it is not envisaged that the scales and distributions of development in the emerging local plans would impact significantly on our emergency response, however, this would be kept under review using our IRMP process and may change due to specific developments in the future.</p> | <p>The comments from SFRS do not relate to the consultation in questions, but rather the Issues and Options for the Ipswich local plan review which closed on Monday 30th October 2017.</p> | <p>Add Suffolk Fire and Rescue Service to the list of non-statutory consultees listed on page 19.</p> |

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| | | <p>SFRS encourages the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but if incorporated into the design/build stage it is extremely cost effective and efficient. SFRS will not have any objection with regard site access to specific developments, as long as access is in accordance with building regulation guidance. There will of course need to be adequate water supplies for firefighting, specific information as to the number and location can be obtained from our water officer via the normal consultation process.</p> <p>These points on access and water can be managed at the planning application stage but the local plan could usefully identify the steps that developers need to take, for ensuring that proper access for emergency vehicles and water supplies can be made. A further beneficial step would be establishing a policy position for securing water supplies via condition and highlighting the several benefits of sprinkler systems in supporting text.</p> | | |
| N/A | Historic England | <p>Thank you for consulting Historic England on the Draft SCI for Ipswich Borough Council. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. This consultation deals with the Council's updated approach to public consultation for planning policies and planning applications. These requirements are set out in legislation in the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act</p> | <p>Noted.</p> <p>Historic England's details have been updated on the consultation database. Under the regulations covering neighbourhood planning, before submitting the proposed neighbourhood plan to the local planning authority, the group needs to</p> | No change required to the SCI. |

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| | | <p>2011), Town and Country Planning (Local Development) England Regulations 2004, the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Neighbourhood Planning (General) Regulations 2012 (as amended).</p> <p>We support the general aims and approach to the draft</p> <p>SCI. We welcome the acknowledgement of Historic England as a statutory consultee under duty to co-operate at Appendix 1, as a specific consultation body with respect to local plans at Appendix 1, as a designated consultation body for Strategic Environmental Assessment at Appendix 1, as well as with regard to planning applications at Appendix 2.</p> <p>With regards to neighbourhood planning, we would welcome notification of proposed neighbourhood planning areas as well as consultation on draft plans. The regulations state that Historic England should be consulted on draft plans where our interests are considered to be affected. We have guidance on neighbourhood planning, which can be found at: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</p> <p>We would welcome consultation at an informal level, in addition to the requirements of the legislation, where issues may benefit from our early involvement. It is helpful to receive hard copies of consultation letters, although email consultation is also acceptable. For information and for further consultation please note our new consultation email addresses for the East of England: Planning Policy:</p> | <p>consider if various statutory consultees need be consulted about the proposals. These statutory consultees include Historic England, amongst others whose interests may be affected.</p> | |
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| | | eastplanningpolicy@HistoricEngland.org.uk Planning Applications (Development Management): e-east@HistoricEngland.org.uk | | |
| Appendices (Pages 17-19) | NHS England Midlands and East (East) | Within the SCI reference to 'NHS Ipswich and East Suffolk Clinical Commissioning Group represented by NHS Property Services Ltd (Suffolk)' should be replaced with 'NHS Ipswich and East Suffolk Clinical Commissioning Group'. This occurs twice within the SCI and should be amended in both instances. | Noted | Correct name of organisation as it appears on pages 17, 18 and 19 of the Draft SCI. |
| N/A | Suffolk Constabulary Designing Out Crime Officer | <p>These are my comments:</p> <ul style="list-style-type: none"> • I find out about planning consultations either via direct contact from IBC (which is most helpful) or via checking the IBC planning weekly lists. • I access documents electronically via the website and usually print them in order to assess them fully. • Whilst the website is very useful, there are sometimes technical issues which can prove frustrating. For example, the time and day that the new lists are available varies from week to week and sometimes documents can be missed from the application. • I found it very helpful in the past to receive a notification when the lists were ready, but I appreciate that this is time consuming for the planning department. • I would find it very useful to be notified when any further action is taken on the applications I have commented on. For example if plans are resubmitted, when applications go before the planning committee and when a decision | Whilst the issues identified cannot be addressed through the SCI, we recognise that they could hamper community participation in the planning process and therefore we intend to update the website in the near future. | No change required to the SCI. |

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| | | <p>is made. Again, I appreciate this may be too time consuming for the department.</p> <ul style="list-style-type: none">• I would also find it very helpful to have some background when changes are made. For example, I may comment on an application and revised plans are submitted. It would be useful to have it clearly identified what changes had been made and also some background as to why the changes had been made. This was the case for the application for flats on Duke St (17/00570/FUL) where the revised plans came with undercroft parking, but no explanation as to why that change had been made. A brief summary of the reasons (ie Undercroft parking now included in order to facilitate extra parking without losing any dwelling units etc) would be very helpful. <p>I think that the whole process could be made much more user friendly for the general public, who, like me, have no formal planning back ground. A clearer explanation of terms (for example what is the difference between a full application and a variation in conditions application) and even things as basic as a full key on each map to explain symbols would be very helpful. It would also be useful to clarify what the conditions are that have been agreed and what the details of the requested change is. Often the summary in the application says 'Application for variation in conditions 8.2 and 12.4 under 15/003450/FUL'. It is often not clear what the change is and also without looking at the previous application, it is not clear what the original application was for. It would be useful if it could include more detail – 'Application for variation in conditions 8.2 and 12.4</p> | | |
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| | | <p>under 15/003450/FUL (50 dwelling units at The Street, Ipswich) to move the access road 20m to the west to improve the shape of plots 20-22 (8.2) and withdraw the condition for all homes to have red windows (12.4) and replace it with white windows ... etc'</p> <p>It would also be useful to clearly identify all documents on the website so that it is clear to see exactly what is held without having to look at each document. This does often happen, but especially when there are multiple pages of documents, it would be useful to ensure this was clear on every document. For example a reference and then a clear description of what the document is 'House Type C' 'Ground floor plan block A etc.</p> <p>IBC certainly provides many methods for making comments on local plans – but I think the majority of the general public would find the documents completely over whelming in terms of size and jargon. The recent request for comments on the local plan review included questions which were helpful, but there were over 100, which again seemed overwhelming (accepting that there was no requirement to answer each question). It would be helpful to provide 'executive summaries' and more explanation around the policies.</p> | | |
| N/A | Sanctuary Housing | I can confirm that Sanctuary Housing is supportive of your plan and will review the draft statement when it is available for inspection on your website. Any comments will be submitted by the deadline you have given of 21 December 2017. | No comments were received. | No further action needed. |

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| <p>Appendices (Page 19)</p> | <p>RSPB</p> | <p>Ipswich Borough lies adjacent to the Stour and Orwell estuaries Special Protection Area (SPA) and Ramsar site. The RSPB has been actively involved in responding to major planning applications and developments around the SPA for many years and is also an active member of the Stour and Orwell Estuaries Management Group (SOEMG).</p> <p>We respectfully request to be included on the list of “Main other consultees” listed in Appendix 2 of the SCI in order that we can support the Council in continuing to make a positive contribution to maintaining the integrity of the Stour and Orwell estuaries SPA.</p> | <p>Noted.</p> | <p>Statutory consultees are defined by statute and therefore the Council cannot include the RSPB on the list of main consultees, however will add the RSBP to the list of non-statutory consultees listed on page 19.</p> |
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