



# Strategic Environmental Assessment and Sustainability Appraisal

Site Allocations and Policies (Incorporating IP-One  
Area Action Plan) Development Plan Document

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Interim SA Report



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## Ipswich Borough Council

# Strategic Environmental Assessment and Sustainability Appraisal

## Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document

### Interim SA Report

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**Report No** 003-UA006314-UE31-01

**Date** January 2014

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# CONTENTS

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ABBREVIATIONS .....	iii
1 INTRODUCTION .....	4
1.1 Background to and Purpose of the Site Allocations DPD .....	4
1.2 Background to and Purpose of the SA Report .....	6
1.3 Structure of this SA Report .....	7
2 SUSTAINABILITY APPRAISAL .....	8
2.1 Legal Requirements .....	8
2.2 Stages in the SA Process .....	8
2.3 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope .....	11
2.4 Stage B: Developing and Refining Options and Assessing Effects ....	34
2.5 Stage C: Preparation of the SA Report.....	38
2.6 Stage D: Consultation on the Core Strategy and the SA Report .....	38
3 APPRAISAL OF THE ALTERNATIVES .....	39
3.1 Alternative Vision and Objectives .....	39
3.2 Alternative Policies .....	39
3.3 Alternative Site Allocations .....	39
4 APPRAISAL OF THE SITE ALLOCATIONS DPD .....	40
4.1 Introduction.....	40
4.2 Appraisal of Vision and Objectives .....	40
4.3 Appraisal of Area Based Policies.....	40
4.4 Appraisal of Site Allocations .....	44
4.5 Appraisal of IP-One Policies .....	63
4.6 Appraisal of Opportunity Areas.....	71
4.7 Cumulative effects .....	78
5 NEXT STEPS .....	81

## Appendices

- Appendix A  
Review of Plans, Programmes and Policies
- Appendix B  
Baseline Data
- Appendix C

Scoping Report Comments  
Appendix D  
Alternatives  
Appendix E  
Sustainability Matrix Area Based Policies  
Appendix F  
Sustainability Matrix Site Allocations  
Appendix G  
Sustainability Matrix IP-One Policies  
Appendix H  
Sustainability Matrix Opportunity Areas

# ABBREVIATIONS

AMR	Authority Monitoring Report
AQMA	Air Quality Management Area
CWS	County Wildlife Site
CIL	Community Infrastructure Levy
DCLG	Department for Communities and Local Government
DECC	Department of Energy and Climate Change
DPD	Development Plan Document
EIA	Environmental Impact Assessment
IBC	Ipswich Borough Council
ICT	Information and Communication Technology
LDF	Local Development Framework
LNR	Local Nature Reserve
LSC	Learning and Skills Council
LSOA	Lower Super Output Area
NPPF	National Planning Policy Framework
NVQ	National Vocational Qualification
ODPM	Office of the Deputy Prime Minister
ONS	Office for National Statistics
PPPs	Plans, Policies, Programmes
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SBRC	Suffolk Biodiversity Records Centre
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems

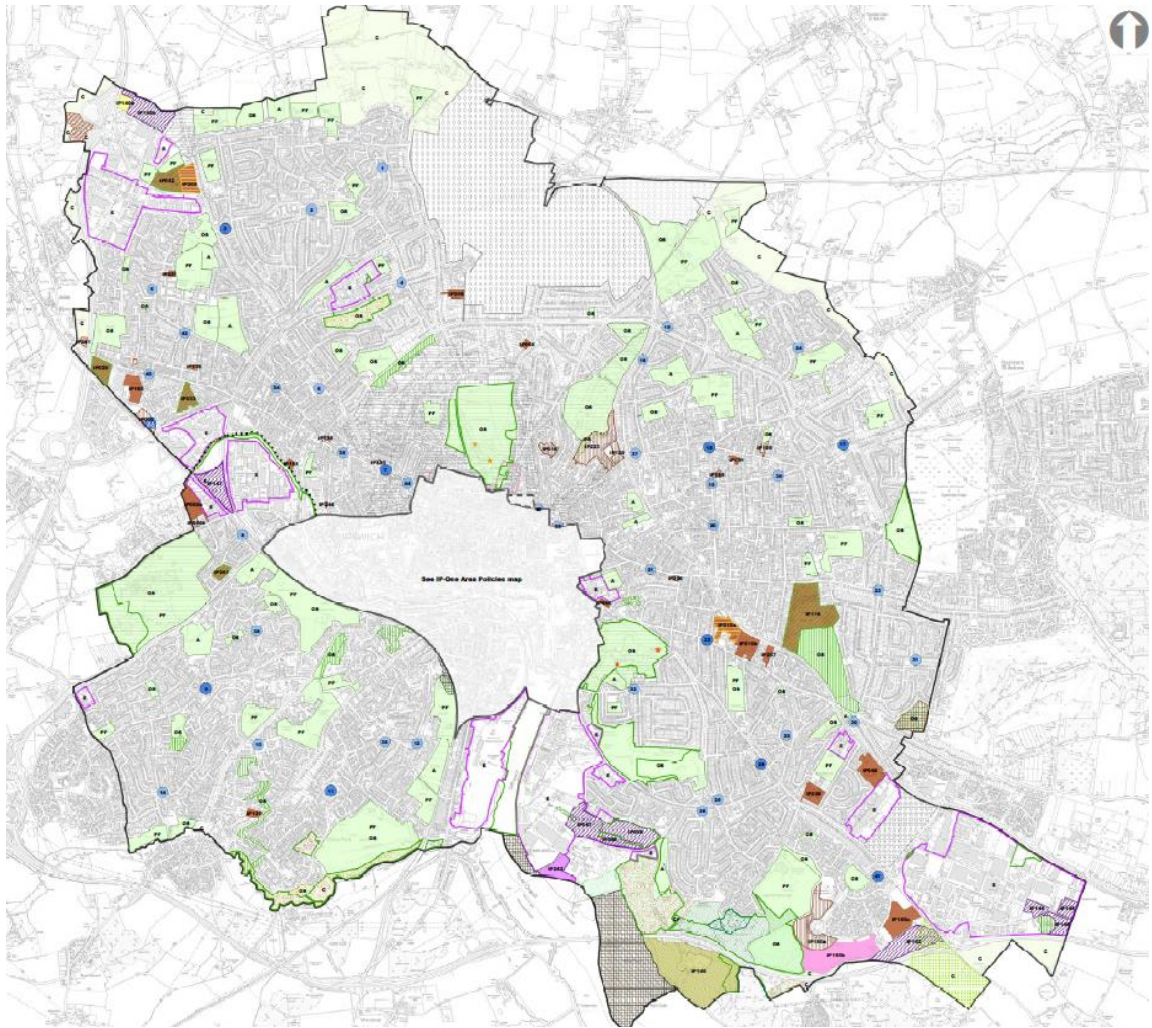
# 1 INTRODUCTION

- 1.1.1. The overarching framework for development in Ipswich Borough to 2027 has been set out in the Core Strategy and Policies plan adopted on 14th December 2011. The Core Strategy also identified strategic sites for development at the Northern Fringe and the former Crane's factory. The Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document (hereinafter referred to as the 'Site Allocations' DPD) adds the site-specific detail to that strategy across the whole Borough. It incorporates the 'IP-One' area of central Ipswich, which was previously dealt with in a separate plan. It will be accompanied by an updated policies map, showing on an Ordnance Survey base map sites for development and those for protection.
- 1.1.2. As part of the preparation process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is being undertaken. The term SA shall be used to refer to the combined SA/SEA for the remainder of this report. This report presents the process and the interim findings of the SA of the draft Site Allocations DPD.

## 1.1 Background to and Purpose of the Site Allocations DPD

- 1.1.3. The Site Allocations DPD will provide detailed site allocations and guidance across the borough. It will incorporate specific planning guidance for a defined area of central Ipswich known as IP-One.

Figure 1-1 Ipswich Borough Council Draft Site Allocations DPD Policies Map



Source: Ipswich Borough Council (October 2013)

1.1.4. The draft Site Allocations DPD includes the following key elements:

- Vision and Objectives
- Area Based Policies
- Site Allocation Policies
- IP-One Policies
- IP-One Opportunity Areas
- Implementation, Targets, Monitoring and Review

1.1.5. The draft Site Allocations DPD is being consulted on as part of the informal consultation under Regulation 18, inviting representations on its content. The Council consulted on the Preferred Options for two plans, Site Allocations and IP-One, in early 2008. However, because of the time that has now elapsed, another round of informal consultation is considered necessary on a full draft plan.

1.1.6. The preparation of the draft Site Allocations DPD commenced with a call for sites issued in February 2013. A joint Scoping Report for the Core Strategy Focused Review and the Site Allocations DPD was prepared for the scoping consultation, which ran between 25th October



and 28th November 2013. Representations received from stakeholders and the public alike were considered when drafting the Site Allocations DPD and the corresponding SA Report.

- 1.1.7. Table 1-1 presents an indicative programme for the Site Allocations DPD and future consultation dates.

**Table 1-1 Indicative Programme for the Site Allocations DPD**

Date	Stage/Element of the Site Allocations DPD
February – December 2013	Development of the Site Allocations DPD
January to March 2014	Informal consultation on the Site Allocations DPD
March to April 2014	Consider comments and Site Allocations DPD development
July to August 2014	Formal publication and consultation period for the Site Allocations DPD
Sept/Oct 2014	Submission
March 2015	Independent examination of Site Allocations DPD by a planning inspector
July 2015	Formal adoption of the Site Allocations DPD

## 1.2 Background to and Purpose of the SA Report

- 1.2.1 SA (incorporating the requirements of the SEA Directive<sup>1</sup>) has been undertaken on the Site Allocations DPD throughout its development. SA is an essential tool for ensuring that the principles of sustainable development are inherent throughout the preparation of the DPD and that it broadly complies with the relevant planning guidance. The overarching aim of the process is to contribute to better decision-making and planning. SA is an iterative process and follows a series of prescribed stages (refer to Section 2.2) in which the elements of the DPD are appraised against Sustainability Objectives, to encourage the selection of the most sustainable options and to ultimately improve the sustainability of the development that is brought forward.
- 1.2.2 An SA of the Preferred Options for the IP-One Area Action Plan and Site Allocations and Policies was prepared in 2007. Since then, the IP- One Area Action Plan and the Site Allocations and Policies DPD have been combined into the Site Allocations and Policies DPD. Because of the time that has elapsed and the changes to the plans, the Council has decided that this SA will assess the DPD as a new document. The findings of the previous SA will, however, inform the assessment.
- 1.2.3 This Interim SA Report provides a summary of the SA process so far and presents the findings and recommendations of the assessment of the draft Site Allocations DPD. The key aims are to:
- Provide information on the Site Allocations DPD and the SA process;
  - Present the key existing social, economic and environmental conditions within Ipswich, in the context of existing plans, programmes and environmental protection objectives, together with relevant baseline information;
  - Identify, describe and evaluate the likely significant effects of the site allocations;

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<sup>1</sup> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, June 2001

- Recommend measures to avoid, reduce or offset any potentially significant adverse effects.

**It is essential that the draft Site Allocations DPD is read in conjunction with this SA Report.**

## 1.3 Structure of this SA Report

1.3.1 Table 1-2 provides an outline of the contents and structure of this SA Report.

**Table 1-2 Contents and Structure of this SA Report**

Section of SA Report	Outline Content
Abbreviations	Abbreviations used in this report.
1: Introduction	Provides the background to, purpose of, and structure of the Site Allocations DPD and this SA Report.
2: Sustainability Appraisal	This section outlines the legal requirements for the SA. It outlines the key elements of the SA process and the approach adopted for appraising the effects of the Site Allocations DPD (including the SA Framework), together with an overview of the consultation requirements.
3: The Site Allocations Alternatives	Outlines the development of alternative options that were considered and appraised as part of the development of the Site Allocations DPD.
4: Appraisal of the Site Allocations	Presents the appraisal of the policies and site allocations against the SA Framework including cumulative effects.
5: Next Steps	Identifies the next steps in the SA process, following consultation on this SA Report. Details of how to comment upon this SA Report are also provided.
Appendix A	Presents an update of relevant Plans, Programmes and Environmental Protection Objectives and their relationship/conflicts with the Site Allocations.
Appendix B	Contains the baseline data, a summary of which is presented in Chapter 2.
Appendix C	Scoping Report Comments
Appendix D	Contains the assessment of alternative sites
Appendix E	Contains the assessment of area based policies
Appendix F	Contains the assessment of site allocations
Appendix G	Contains the assessment of IP-One policies
Appendix H	Contains the assessment of opportunity areas

## 2 SUSTAINABILITY APPRAISAL

### 2.1 Legal Requirements

- 2.1.1 It is a legal requirement that the Site Allocations DPD is subject to SA, under the Planning and Compulsory Purchase Act 2004. This Act stipulates that the SA must comply with the requirements of the SEA Directive which was transposed directly into UK law through the SEA Regulations<sup>2</sup>.
- 2.1.2 The aim of the SEA is to ‘provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development’ (Article 1 of the SEA Directive).
- 2.1.3 A combined SA and SEA has been undertaken, as the Site Allocations DPD has the potential to have a range of significant sustainability effects (both positive and negative). The SA has been undertaken in accordance with guidance from the Planning Advisory Service (<http://www.pas.gov.uk/pas/core/page.do?pagelId=152450>). In addition, published Government guidance on SEA<sup>3</sup> (hereafter referred to as the Practical Guide) has also been followed.

### 2.2 Stages in the SA Process

- 2.2.1 Although there are formalised approaches for both SA and SEA, only the latter has a legal obligation to perform certain activities as stipulated in the SEA Directive. These legal obligations have been adhered to throughout the SA process by following a series of prescribed stages, through which the elements of the Site Allocations DPD have been appraised using Sustainability Objectives (Table 2-1 provides further detail).
- 2.2.2 Table 2-1 presents a summary of the key stages of the SA process, together with the SEA Directive requirements for each stage. Reference is given to where the requirements have been addressed within this SA Report.

**Table 2-1 Stages in the SA Process and SEA Directive Requirements**

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Site Allocations DPD
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b>			
A1: Identifying other relevant policies, plans and programmes and sustainability objectives	The Environment Report should provide information on: <i>“the relationship (of the plan or programme) with other relevant plans and programmes”</i> (Annex 1(a)) <i>“the environmental protection objectives, established at international (European) Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation”</i> (Annex 1(e))	Chapter 2 and Appendix A.	Stage A corresponds to the scoping stage of the SA and the findings of this stage are presented in the Scoping Report that was consulted upon in October / November 2013.  During this stage the scope of the SA for the Site Allocations

<sup>2</sup> S.I. 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations, 2004

<sup>3</sup> ODPM *et al.* (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Site Allocations DPD
A2: Collecting baseline information	The Environment Report should provide information on: <i>“relevant aspects of the current state of the environment and the likely evolution thereof without its implementation of the plan or programme”</i> and, <i>“the environmental characteristics of the areas likely to be significantly affected”</i> (Annex 1(b), (c))  <i>“any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC”</i> (Annex 1 (c))	Chapter 2 and Appendix B	was defined.
A3: Identifying sustainability issues and problems		Chapter 2	
A4: Developing the SA Framework		N/A	
A5: Consulting on the scope of the SA	<i>The authorities referred to in Article 6(3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.(Article 5.4)</i>	The scope of the appraisal is presented in Chapter 2.  A Scoping Report was produced and consulted upon.	
<b>Stage B: Developing and Refining Options and Assessing Effects</b>			
B1: Testing the Site Allocations DPD’s objectives against the SA Framework	The Environment Report should consider <i>“reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”</i> and give <i>“an outline of the reasons for selecting the alternatives dealt with”</i> (Article 5.1 and Annex I(h))	Chapters 3 and 4 and Appendix D, E, F, G.	Stage B of the SEA process is linked to the overall production of the Site Allocations DPD which includes the development of the site allocations and preferred options.  This Interim SA Report presents the findings of the assessment of policies and site allocations.
B2: Developing the Site Allocations DPD Options	In the Environmental Report, <i>“the likely significant effects on the environment of implementing the plan or programme ... and reasonable alternatives ... are [to be] identified, described and evaluated”</i> (Article 5.1)		
B3: Predicting the effects of the Site Allocations DPD			
B4: Evaluating the effects of the Site Allocations DPD			
B5: Considering ways of mitigating adverse effects and maximising beneficial effects	Annex I (g) states that it should also include <i>“measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme...”</i>		
B6: Proposing measures to	<i>The Environmental Report should provide information on “a description of the measures envisaged concerning</i>		

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Site Allocations DPD
monitor the significant effects of implementing the Site Allocations DPD	<i>monitoring</i> " (Annex I (i))		
<b>Stage C: Preparing the SA Report</b>			
C1: Preparing the SA Report	Article 5.1 contains the requirement for an environmental report to be produced where an assessment is required. The environmental report " <i>shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication..</i> " (Article 5.2). Details of the information to be given in the Environmental Report are provided in Annex 1.	This Interim SA will inform the preparation of the draft SA Report. Following the informal consultation, a draft SA Report will be prepared.	A SA Report will be produced in line with the requirements of the SEA Directive for producing an Environmental Report. A Non Technical Summary will also be included with the SA Report.
<b>Stage D: Consultation on the Site Allocations DPD and the SA Report</b>			
D1: Public participation on the proposed submission documents	Article 6 contains the requirements for the draft plan or programme and the environmental report to be made available to statutory authorities and the public. They should be given an ' <i>early and effective opportunity within time frames to express their opinions</i> ' (Article 6.2).		The Submission SA Report and the Site Allocations DPD will be consulted upon in accordance with Regulation 19 and 20 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012.
D2: Appraising significant changes resulting from representations	N/A	N/A	Following the receipt of representations, the SA Report may need to be updated to reflect comments received. The SA Report will need to be updated to accompany the submission (Regulation 22) version of the Site Allocations DPD. It will be essential for the SA Report and the Site Allocations DPD to remain consistent.
D3: Making decisions and providing information			
<b>Stage E: Monitoring the significant effects of implementing the Site Allocations DPD</b>			
E1: Finalising aims and methods for monitoring	<i>"Member States shall monitor the significant environmental effects of the implementation of plans and programmes... in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action"</i> (Article 10.1)		Monitoring undertaken for the SA process should feed into the Authority Monitoring Report AMR).
E2: Responding to adverse effects			

2.2.3 The following sections detail the activities that have been, and are proposed to be, undertaken at each stage of the SA process. This provides context and background to the SA including its agreed scope, the methodology for the appraisal of the Site Allocations DPD, and the technical limitations to the appraisal.

## 2.3 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope

### Review of Plans, Policies and Environmental Protection Objectives

2.3.1 The box below stipulates the SEA Directive requirements for this stage of the process.

#### **Box 1: SEA Directive Requirements for the Review of Plans Programmes and Environmental Protection Objectives**

*The SEA Directive requires that the SEA covers:*

*'an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes' (Annex 1 (a)).*

*'the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation' (Annex 1 (e))*

2.3.2 An update of the review of other plans and programmes that may affect the preparation of the Site Allocations DPD was undertaken in order to contribute to the development of both the SA and the Site Allocations DPD. This included:

- Identification of any external social, environmental or economic objectives, indicators or targets that should be reflected in the SA process.
- Identification of any baseline data relevant to the SA.
- Identification of any external factors that might influence the preparation of the plan, for example sustainability issues.
- Identification of any external objectives or aims that would contribute positively to the development of the Site Allocations DPD.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the Site Allocations DPD.

2.3.3 The review included documents prepared at international, national, regional and local scale. A brief summary of the documents reviewed and the main findings are summarised below with further details presented in Appendix A.

### International Plans and Programmes

2.3.4 A review was undertaken of key International Conventions and European Directives that could potentially influence the development of the Site Allocations DPD and the SA. European Directives are transposed into national legislation in each individual Member State and, therefore, there should be a trickle-down effect of the key principles and an application to the relevant national, regional and local circumstances in other planning documents.

## National Plans and Programmes

- 2.3.5 A review was undertaken of relevant White Papers, plans and strategies. One of the most important documents reviewed was the UK Sustainable Development Strategy<sup>4</sup> which outlines the over-arching Government objective to raise the quality of life in our communities.
- 2.3.6 Central Government establishes the broad guidelines and policies for a variety of different topics which are now brought together in the National Planning Policy Framework (NPPF). The NPPF streamlines national planning policy into a consolidated set of priorities to consider when planning for and deciding on new development.
- 2.3.7 It sets national priorities and rules only where it is necessary to do so. It aims to ensure that planning decisions reflect genuine national objectives - such as the need to safeguard the natural environment, combat climate change, and to support sustainable local growth - while allowing for local authorities and communities to produce their own plans, reflecting the distinctive needs and priorities of different parts of the country. The principle of sustainable development is at the heart of the NPPF.
- 2.3.8 The NPPF guidance is structured around the following sections:
- Building a strong, competitive economy;
  - Ensuring the vitality of town centres;
  - Supporting a prosperous rural economy;
  - Promoting sustainable transport;
  - Supporting high quality communications infrastructure;
  - Delivering a wide choice of high quality homes;
  - Requiring good design;
  - Promoting healthy communities;
  - Protecting Green Belt land;
  - Meeting the challenge of climate change, flooding and coastal change;
  - Conserving and enhancing the natural environment;
  - Conserving and enhancing the historic environment;
  - Facilitating the sustainable use of minerals;
  - Plan-making; and
  - Decision-taking.

## Regional and Sub-Regional Level Plans

- 2.3.9 A wealth of different plans and strategies have been produced at the regional (East of England) and sub-regional (Suffolk / East Anglia) level covering a variety of topics including; housing; economic development and performance; climate change (including flood risk); renewable energy; innovation; rural development; waste management; accessibility; equality and diversity; health; waste; cultural provision and diversity; and physical activity. All of the objectives of these plans as well as some of the challenges they raise need to be taken on board and driven forward by the borough as appropriate. However, it must be noted that the overarching goals of

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<sup>4</sup> UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)

some of these plans and strategies may be outside the remit of the Site Allocations DPD which forms only an individual part of a number of different vehicles trying to deliver regional and sub-regional targets.

- 2.3.10 The Localism Act was granted Royal Assent on 15th November 2011. This Act seeks to rescind some regional planning documents such as the East of England Plan (Regional Spatial Strategy 2008) which was revoked in 2013.

## Local Policy

- 2.3.11 Plans produced at the local level specifically address issues relating to the economy; health; safety; tourism; sustainable communities; housing; employment; and physical activity. The Site Allocations DPD and the SA should draw from these documents and transpose their aims in their policies and proposals. These local policy plans have been instrumental in the development of the SA Framework (refer to Section 2.4). These plans should in theory have included the main influences of international, national, regional and county level plans through the 'trickle-down effect'. They should also provide more of a local focus for the Ipswich area. It is through identifying these themes and incorporating them into the Site Allocations DPD that synergies can be achieved with other relevant documents.

## Key Results from the Review

- 2.3.12 There were many common themes emerging through the review of plans, programmes and environmental protection objectives. The list below provides a summary of the main themes and issues identified:

- The need to reduce greenhouse gas emissions and increase energy efficiency.
- The need to ensure that new housing development meets local needs (for all sections of society).
- The need to protect and enhance the vibrancy of centres.
- The need for the protection and enhancement of the quality and character of urban areas.
- Recognising the need for the townscape to evolve and for development to be appropriate to townscape setting and context.
- Recognising the importance of improving and developing cultural assets.
- The need to conserve and enhance biodiversity as an integral part of economic, social and environmental development.
- The need to protect and enhance the historic environment. The Government has an overarching aim for the conservation and enjoyment of the historic environment and heritage assets.
- The need to promote sensitive waste management.
- The need to develop transport and infrastructure that supports sustainable growth.
- The need to promote more sustainable transport choices and to improve accessibility.
- The need to promote the use of renewable energy and renewable technologies in appropriate locations.
- Recognising the importance of open spaces, sport and recreation and the contribution that they make to enhancing quality of life.
- The prudent use of natural resources.
- The need to promote and protect the water environment including issues such as quality and resource use.



- The need to establish protocols and control development within areas at risk of flooding.
- The need to protect and enhance air quality.
- The need to promote community cohesion and to establish an area where individuals want to both live and work.
- The need to adapt to the threat posed by climate change.
- The need to protect and enhance biodiversity resources particularly sites of international importance e.g. Special Protection Areas (SPAs) and Ramsar Sites.
- The need for long-term sustainable patterns of development that provide for the economic and social needs of all populations.
- The need to reduce crime and fear of crime.
- The need to protect and enhance ecosystem functions and services.
- Raising levels of health and well-being and promoting greater levels of physical activity.
- Establishing a housing market that meets the needs of all residents.
- Promoting sustainable economic development and a range of employment opportunities that meet the needs of all sectors of the population and all skills levels.
- Promoting higher levels of design quality including improvements to energy efficiency.
- The need to raise the quality and improve the choice of learning opportunities and the importance of education and knowledge based industries.

2.3.13 The European Spatial Development Perspective identified a potential conflict that is likely to prevail in all countries, irrespective of their location and this concerns balancing the social and economic claims for spatial development with an area's ecological and cultural functions to ensure that the most sustainable patterns of development are achieved. Through the SA process and the inclusion of suitable sustainability objectives, indicators and targets, it should be possible to identify where potential issues and conflicts may arise and to develop suitable policy modifications and mitigation measures. The plans, programmes and environmental protection objectives that have been looked at in this review are included within Appendix A.

## The Sustainability Baseline and Key Sustainability Issues

2.3.14 Box 2 defines the SEA Directive requirements for this element of the process.

### Box 2: SEA Directive Requirements for Baseline Data Collation

*The SEA Directive requires that the SEA covers:*

*'the environmental characteristics of areas likely to be significantly affected' (Annex 1 (c))*

*'any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EC'(Annex 1 (d)).*

## Methodology

2.3.15 Characterising the environmental and sustainability baseline, issues and context helps to define the SA Framework. It involves the following key elements:

- Characterising the current state of the environment within the Ipswich area and immediate surroundings (including social and economic aspects as well as the natural environment); and

- Using this information to identify existing problems and opportunities which could be considered in the Site Allocations DPD where relevant.

2.3.16 The environmental, social and economic baseline was characterised through the following methods:

- Review of relevant local, sub- regional, regional, national and international plans, policies and environmental protection objectives;
- Data gathering using a series of baseline indicators developed from the SEA Directive topics (biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape). This included advice in *A Practical Guide to the Strategic Environmental Assessment Directive* from the ODPM, previous consultation recommendations from other SAs and the range of data available for the Borough. Data has also been collated for additional socio-economic topic areas including deprivation, housing and employment to ensure that a broad range of environmental, social and economic issues are considered.
- Consideration of the scope and contents of the Site Allocations DPD.

2.3.17 A detailed description of the baseline characteristics of the Ipswich area is provided in Appendix B.

## Key Sustainability Issues and Opportunities

2.3.18 The baseline data has been used to identify the key sustainability issues and opportunities in Ipswich. These will be updated as the baseline data is updated throughout the process. Although these have been grouped by broad sustainability themes, many are indirectly or directly linked and are therefore closely related.

**Table 2-2 Summary of Key Sustainability Issues and Opportunities in Ipswich**

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Population	<p>Ipswich has the highest population of all the boroughs within Suffolk.</p> <p>The level of projected population growth within Ipswich is relatively high and so a large number of new homes is considered necessary within Ipswich in order to meet the needs of all members of the population.</p> <p>There are potential challenges that could arise in the future relating to the type and tenure of housing provision on offer in the Borough. These issues include provision of homes for the elderly that meet needs such as accessibility, the provision of affordable homes, and the provision of smaller homes with one to two and two to three bedrooms.</p> <p>There is a high percentage of people under the age of 34 in Ipswich, which may have implications for provision of educational facilities, recreational facilities etc.</p> <p>Asian/Asian British are the main ethnic minority representing 6.3% of the population and therefore there needs to be appropriate services provision for all members of the population in terms of education, housing etc.</p>	<p>There are opportunities to improve the supply of housing, education, health and other community facilities within the Borough through allocating sufficient land to meet objectively assessed housing need in accordance with the Strategic Housing Marketing Assessment 2012 and allocating land for community facilities.</p> <p>Planning for a rise in the number of primary school age children is necessary, where appropriate, based on the level of forecast population growth and demand.</p> <p>Additionally, supporting the completion of regeneration projects at the Waterfront would provide opportunities to address some issues relating to the provision of housing and community facilities.</p>
Education and Qualifications	<p>Educational attainment across Ipswich is below the national average. However, the percentage of population holding recognised qualifications is average across Ipswich with numbers of those with no qualifications and achieving National Vocational Qualification (NVQ) Level 4 similar to regional and national averages.</p> <p>Gipping, Priory Heath, Whitehouse, Castle Hill, Stoke Park, Rushmere, Sprites and Gainsborough wards have LSOAs that fall within the 20% most deprived for education skills and training (ONS 2010 Indices of Multiple Deprivation).</p>	<p>There are certain limitations as to how far the Site Allocations DPD could contribute to improving educational attainment in the borough since most of the schools to be built are primary schools and one secondary school. Land could be allocated for new schools to meet the demand of the growing population and the influx of new residents but the effects from such policy on the overall educational attainment would be minor positive since educational attainment is influenced by other factors.</p> <p>Opportunities with regards to educational attainment are more specifically addressed within the Suffolk Growth Strategy 2013 and the Site Allocations DPD will only have a supporting role in safeguarding land for educational use.</p>
Human Health	<p>Life expectancy from birth for males is slightly lower than the national average and life expectancy from birth for females is slightly higher than national averages.</p> <p>There is a need to reduce the incidence of diseases and health inequalities.</p> <p>Levels of teenage pregnancy are higher than regional and national levels and have implications for health service provision, housing and educational attainment.</p> <p>Alexandra, Westgate, Whitton, Gainsborough, Gipping and Stokes Park wards all have LSOAs within 20% of the most deprived for health deprivation and disability.</p>	<p>There are opportunities to improve the health of the Borough thorough the provision of new homes as there are links between the supply of decent housing and health.</p> <p>There are opportunities to provide recreational facilities which could improve levels of physical fitness. Opportunities should also be sought to encourage walking and cycling through the location and design of development.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Water	<p>The key watercourses in the Borough are the River Gipping and Belstead Brook which both flow into the River Orwell.</p> <p>The Environment Agency has identified a risk of flooding on land adjacent to the Rivers Orwell, Gipping, Belstead Brook and Westerfield Watercourse.</p> <p>The East of England is the driest part of the country and water supply is critically important, not only to agriculture but to some of the businesses currently located in Suffolk. Limited water availability and increasing demands means that much of the water resource in Suffolk is considered to be fully committed, if not overcommitted, to existing users (EA).</p> <p>Water quality is also a key sustainability issue. Most of the central and western area of Ipswich is designated as Source Protection Zone (SPZ) 2, with two smaller areas designated as SPZ1. SPZs are used to identify those areas close to drinking water sources, where the risk associated with groundwater contamination is greatest, and are important for identifying highly sensitive groundwater areas. SPZs are also recognised within the Environmental Permitting Regulations as a zone where certain development activities cannot take place.</p>	<p>The sustainability issues with regards to the SA topic Water are predominantly dealt with through policies included in the Core Strategy.</p> <p>Flood risk issues should be taken into consideration when allocating sites for development.</p>
Soil and Land Quality	<p>Much of Ipswich is an urban built up environment. The Northern Fringe area is located on Grade 2 Agricultural Land. This is considered to be the best and most versatile agricultural land.</p> <p>There is some known potentially contaminated land within the Borough.</p>	<p>Opportunities should be sought to include allotment space within the Borough where possible.</p> <p>Any sites allocated for development which include potentially contaminated land should be remediated before re-use.</p>
Air Quality	<p>There are four Air Quality Management Areas (AQMAs) within the Ipswich Borough, all of which are designated for NO<sub>2</sub> exceedences. All of the AQMAs are located within central Ipswich.</p>	<p>Opportunities should be sought to promote the use of public transport, walking and cycling e.g. through the location of sites in areas already served by public transport or at distance from the main community facilities which will encourage sustainable modes of transport.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Climatic Factors	<p>A number of areas within Ipswich lie within the floodplain. Largely these areas are associated with the River Gipping and River Orwell. There are also smaller watercourses at risk of flooding – Westerfield Watercourse and Belstead Brook.</p> <p>There are areas at risk of flooding, some from tidal surges and some from heavy rain. This risk may continue to grow as a result of rising sea levels and increasingly heavy rainstorms that can overwhelm drainage systems and cause localised flooding unless mitigation measures are implemented.</p> <p>The Ipswich Flood Defence Management Strategy is a major scheme to reduce flood risk to Ipswich over the coming years. The strategy was approved in March 2006 and recommends an investment in new flood defences across Ipswich to significantly reduce flood risk to over 3,000 residential properties. Half of the projects of the scheme have been completed with an expected date to deliver the final Tidal Barrier Project in 2018 (Environment Agency).</p>	<p>Flood risk issues should be taken into consideration when allocating sites for development and new development should be encouraged to use SuDS to manage runoff and further reduce flood risk on sites allocated within Flood Zones (particularly as some new development would be situated on previously undeveloped land).</p>
Biodiversity, Flora and Fauna	<p>There are three Sites of Special Scientific Interest (SSSI), one Special Protection Area (SPA), one Ramsar site, six Local Nature Reserves (LNR) and 19 County Wildlife Sites (CWS) within Ipswich (See Map 1 Sites of Ecological Importance).</p> <p>There is one area of ancient and semi-natural woodland along with ancient replanted woodland to the south of the Borough.</p>	<p>Development proposals should maximise opportunities to protect and enhance habitats and where appropriate create new habitats in order to deliver the biodiversity objectives of the relevant Biodiversity Action Plans (BAPs). When allocating sites for development, consideration should be given to the proximity of the development to the designated sites and the most appropriate use of the land.</p>
Cultural Heritage	<p>Ipswich is home to a wealth of heritage assets including those of a national and local importance.</p> <p>There are over 600 Listed Buildings, of which 11 are Grade I and 25 are Grade II*.</p> <p>There are ten Scheduled Ancient Monuments and 14 Conservation Areas (See Map 2 Cultural Heritage Assets).</p> <p>Several sites within Ipswich are listed on the Sites and Monuments Record.</p>	<p>It is important to ensure that the cultural heritage is protected and that cultural heritage issues are taken into consideration in allocating new sites for development.</p> <p>Cultural heritage features should be conserved and enhanced.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Landscape/ Townscape	<p>The majority of Ipswich's' landscape typology is urban with some areas in the north located within ancient rolling farmlands and areas in the south east located within ancient rolling farmlands and rolling estate sandlands.</p> <p>The town centre has changed significantly during the twentieth century and although many historic buildings were lost to make way of new developments, it is a designated Conservation Area with historic and archaeological significance.</p> <p>In Ipswich there are over 600 Listed Buildings, of which 11 are Grade I and 31 are Grade II* (Ipswich Borough Council, Listed Buildings in Ipswich). Listed Buildings are largely concentrated within the town centre.</p>	<p>It is essential that landscape and townscape character and quality is enhanced through high quality design, careful siting, the incorporation of soft landscaping and attention to boundary treatments.</p> <p>In addition, when allocating sites for development it is important to maintain the gap between Ipswich and adjacent villages to preserve local distinctiveness.</p>
Minerals and Waste	<p>There are a number of waste facilities within the Borough, including, a household waste and recycling centre, a composting site and facilities for metal / end of life vehicles (not inclusive). In addition, an energy from waste incinerator is under construction at Great Blakenham (Masons Quarry) which lies approximately 3km north of the Borough boundary, therefore transport implications must be managed carefully.</p> <p>Although 42% of household waste produced in Ipswich is being sent for reuse, recycling or composting instead of to landfill, this is lower than the figure for Suffolk (53.8%).</p>	<p>Waste management issues are addressed through policies included in the Core Strategy (e.g. Policy CS4) and opportunities are identified in Table 3-2.</p> <p>Sites for waste management facilities are allocated through the Waste Core Strategy prepared by Suffolk County Council.</p>
Transportation	<p>The Borough is well connected by transport infrastructure and public transport links. The Ipswich Local Transport Plan includes a series of key priorities addressing transport and accessibility which include encouraging the provision and use of an integrated effective transport system which maximises the use of public transport, walking and cycling and reduces the overall impact of travel on the environment.</p>	<p>It will be important to ensure that new development can be easily accessed by public transport through location of site for development.</p> <p>It will be important to manage the additional travel demands that growth will generate and guide as many as possible to sustainable modes for the good of the environment, economy and health.</p> <p>The cycling and walking network within the Borough should be expanded and enhanced, particularly between the Waterfront and town centre.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Economy	<p>Ipswich has a strong employment base for businesses with a slightly higher proportion than the Suffolk average of the population at the working age, but it also has a relatively higher proportion of people who are economically inactive. Employment in Ipswich exceeds the national profile in the finance, IT, transport, communications, and public administration education and health sectors. It is below the national profile in manufacturing.</p> <p>Ipswich has lower working age skills levels, especially at degree level (22.8%), than the county as a whole (24.4%). It is even further below the regional and national levels (29.9%) (State of Ipswich Report May 2011). A lower than average proportion of Ipswich's population are classified as managers or senior officials while caring, leisure and other service occupations along with sales and customer service occupations and process plant and machine operatives are higher than regional and national averages.</p> <p>The Job Seekers Allowance rate in Ipswich (2011) is high compared to Suffolk and the national figures. It is particularly high for males, between the ages of 25-49 who have been unemployed for 6-months or over.</p> <p>The gross weekly pay for employees in Ipswich is lower than national and regional average and the Borough has higher numbers of people claiming benefits than county and national indicators suggest (2010).</p> <p>The factors restricting economic growth in Suffolk in general are a lack of qualified staff and poor broadband; as well as a lack of customers, transport links, and poor quality premises (Suffolk Growth Strategy).</p>	<p>Allocating enough good quality employment land to attract and retain jobs within the Borough is the main opportunity identified with regards to the SA topic.</p> <p>In addition, there are opportunities to attract private sector interest in the town to service and provide more opportunities for existing and new communities, such as more and better shops to enhance the high street.</p> <p>Allocating suitable and available sites for future town centre development to attract new investment in the centre without overstretching it is a key opportunity.</p>
Deprivation and Living Environment	<p>Gainsborough, Whitton, Whitehouse, Gipping, Stoke Park, Priory Heath, Bridge and Alexander wards all have LSOAs in the bottom 20% most deprived nationally (Index of Multiple Deprivation).</p> <p>Deprivation is a very complex issue and a number of different issues will need to be addressed for noticeable improvements to be realised.</p> <p>30% of all the crime in Suffolk happens in Ipswich and 10% of all the crime in Suffolk happens in the Town Centre of Ipswich as a result of the night time economy. Ipswich also has the highest prevalence of organised crime in Suffolk including people trafficking, drug dealing and prostitution. Anti-social behaviour also forms a large percentage of crime incidents in Ipswich in June 2012.</p>	<p>There is a need to tackle anti-social behaviour and crime rates should be further reduced to enhance overall quality of life in Ipswich. This could be achieved through incorporating safety by design principles into new development and ensuring appropriate housing mixes are adopted. In addition, generally providing improved employment and educational opportunities for the local population could also contribute to improve crime rates.</p> <p>Access to sports facilities should be enhanced. This could have associated health benefits.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Housing	<p>Housing costs are relatively low but have gradually increased in recent years. Median house price (July 2013) in Ipswich is £150,000, which shows an increase of 7.1% from the median price of the same time the previous year (£140,000). The average house price is lower than Suffolk (£167,000 in July 2013) and lower than that in the East of England (£178,000 August 2013 – ONS). House prices have gradually increased but incomes have not matched this rate of growth, which may lead to problems of housing affordability.</p> <p>The affordability of purchased homes in 2011 was a ratio of 5:7 which was less than the affordability for Suffolk 6:9, the East of England 7:6 and England 6:5 (Office for National Statistics Local Profiles).</p> <p>During the period April 2011 – March 2012 283 dwellings net were completed, 54% of them were affordable homes (AMR 8 2011/2012). The longer-term affordable housing delivery average as a percentage of total housing completions for 2001-12 is 22%.The number of people presenting themselves as homeless increased 2012-11 to 2012-13.</p> <p>The Council's adopted Core Strategy sets a target to allocate land to accommodate at least 14,000 additional residential units between 2001 and 2021 (700 dwellings p.a.). Housing delivery has averaged 653 p.a. April 2001 to March 2012. Completions peaked in 2007-08 but have fallen since then in line with the downturn and subsequent recession.</p> <p>The Strategic Housing Marketing Assessment 2008 which has further been updated in 2012 found there is a need for smaller one to two bedroomed homes in Ipswich to meet the needs of smaller households and an ageing population, as well as a continued need for smaller two to three bedroomed family homes. Much of recent housing development in Ipswich, however, has been in the form of one and two bedroomed apartments and in the present economic climate there is an oversupply of flats.</p>	<p>Allocating sufficient land to meet objectively assessed housing need in accordance with the Strategic Housing Marketing Assessment 2012 will be sought.</p> <p>Housing regeneration efforts present a significant opportunity both to revitalise the housing stock, address deprivation and to improve quality of life.</p>



## The SA Framework

### Background to the SA Framework

- 2.3.19 The SA Framework underpins the assessment methodology and comprises a series of Sustainability Objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. Whilst the SEA Directive does not require the use of Sustainability Objectives, they are a recognised tool for undertaking the assessment and are aspirations/goals that an authority/organisation should work towards achieving.
- 2.3.20 The Sustainability Objectives are separate from the DPD Objectives, although there may be some overlaps between them. The following section provides further details about the development of the SA Framework.

### Development of the Sustainability Objectives

- 2.3.21 The Sustainability Objectives have been developed using the review of other relevant plans, programmes and environmental objectives, the baseline data and the key issues and opportunities. They were originally agreed in 2006 during the initial SA Scoping for Ipswich's Local Plan and subsequently the SA of Ipswich's now adopted Core Strategy DPD.
- 2.3.22 The SA Objectives have since been reviewed and have been slightly modified to reflect the requirements of the draft Site Allocations DPD.
- 2.3.23 Table 2-3 presents the SA Objectives that were used in the assessment of the DPD and its options. Each of the Sustainability Objectives is supported by a series of SA Sub-Objectives and indicators to add further clarity and to assist the assessment process. As the SA process progresses, indicators and where appropriate, targets were developed to assist the assessment.

**Table 2-3 The SA Framework**

SA Objective			SA Indicator	Source
ET1	To improve air quality	<ul style="list-style-type: none"> <li>▪ Would the policy contribute to the protection and improvement of local air quality?</li> <li>▪ Would the policy contribute to the impact of traffic congestion on air quality?</li> </ul>	<p>ET1a. Number and distribution of AQMAs</p> <p>ET1b. Exceedances of the annual average objective level for Nitrogen Dioxide in the AQMAs</p>	<p>Air Quality Archive</p> <p>Ipswich Borough Council</p>
ET2	To conserve soil resources and quality	<ul style="list-style-type: none"> <li>▪ Would any new developments protect the land within the Borough from new contamination and exposure to existing contaminated land?</li> <li>▪ Would new developments help to maintain and enhance soil quality where possible?</li> </ul>	<p>ET2a. Area of contaminated land returned to beneficial use</p> <p>ET2b. Density of new development</p> <p>ET2c. Amount (ha) of previously developed land available</p>	<p>Ipswich Borough Council</p> <p>Office for National Statistics (ONS)</p> <p>Department for Communities and Local Government</p>
ET3	To reduce waste	<ul style="list-style-type: none"> <li>▪ Would the implementation of the policy increase the proportion of waste recycling and re-use?</li> <li>▪ Would the implementation of the policy reduce the production of waste per capita?</li> <li>▪ Would the implementation of the policies result in reduction of the proportion of waste landfilled?</li> <li>▪ Would new developments encourage a reduced demand for raw materials?</li> <li>▪ Would new developments promote the use of recycled and secondary materials in construction?</li> </ul>	<p>ET3a. Tonnage of household waste produced and recycled</p> <p>ET3b. Location and number of waste facilities serving the Borough</p> <p>ET3c. Amount of household waste collected per household</p>	<p>Defra</p> <p>Suffolk County Council</p>

SA Objective			SA Indicator	Source
ET4	To reduce the effects of traffic upon the environment	<ul style="list-style-type: none"> <li>▪ Would the policy ensure that public transport services meet people's needs i.e. through new bus services?</li> <li>▪ Would the policy ensure that highways infrastructure meets people's needs (including walking and cycling routes)?</li> <li>▪ Would new developments promote the use of sustainable travel modes and reduce dependence on the private car?</li> </ul>	<p>ET4a. Traffic volumes, access to local services and journeys taken by sustainable modes</p> <p>ET4b. Journey to work by mode</p>	Ipswich Borough Council 2001 and 2011 Census
ET5	To improve access to key services for all sectors of the population	<ul style="list-style-type: none"> <li>▪ Would new development maintain and improve access to essential services and facilities?</li> <li>▪ Would new development improve access to open space?</li> </ul>	<p>ET5a. Proportion of new developments with access to key services by walking, cycling and public transport</p> <p>ET5b. Number of LSOAs with wards in bottom 10% of most deprived in terms of barriers to housing and services provision</p>	Ipswich Borough Council <a href="http://www.communities.gov.uk">www.communities.gov.uk</a>
ET6	To limit and adapt to climate change	<ul style="list-style-type: none"> <li>▪ Would new developments contribute to a reduction in greenhouse gas emissions?</li> <li>▪ Would new developments require the inclusion of SuDS?</li> <li>▪ Would new developments reduce the demand for energy and increase energy efficiency?</li> <li>▪ Would new developments increase the use of renewable energy?</li> <li>▪ Would the policy contribute to a reduction in CO<sub>2</sub> emissions from the transport sector?</li> <li>▪ Would new developments reduce and manage flooding?</li> </ul>	<p>ET6a. Total CO<sub>2</sub> emissions for the Borough</p> <p>ET6b. Annual average domestic gas and electricity consumption</p> <p>ET6c. Provision of shading and greening (i.e. avoiding the heat island effect)</p>	ONS Department for Energy and Climate Change (DECC) Ipswich Borough Council

SA Objective			SA Indicator	Source
ET7	To protect and enhance the quality of water features and resources and reduce the risk of flooding	<ul style="list-style-type: none"> <li>▪ Would the policy ensure the protection and enhancement of ground and surface water quality?</li> <li>▪ Would the policy encourage sustainable use of water resources?</li> <li>▪ Would the policy encourage the inclusion of flood mitigation measures such as SuDS?</li> <li>▪ Would new developments reduce and manage flooding?</li> </ul>	<p>ET7a. Water quality in rivers and groundwater quality</p> <p>ET7b. Daily domestic water use (per capita consumption, litres)</p> <p>ET7c. Number of planning applications granted permission contrary to Environment Agency advice</p>	<p>The Environment Agency</p> <p>Suffolk County Council</p> <p>Ipswich Borough Council</p>
ET8	To conserve and enhance biodiversity and geodiversity , including favourable conditions on SSSIs, SPAs and SACs	<ul style="list-style-type: none"> <li>▪ Would the policy protect and enhance designated sites of nature conservation importance?</li> <li>▪ Would the policy protect and enhance wildlife especially rare and endangered species?</li> <li>▪ Would new developments protect and enhance habitats and wildlife corridors?</li> <li>▪ Would new developments provide opportunities for people to access wildlife and open green spaces?</li> <li>▪ Would new development protect and enhance geodiversity?</li> </ul>	<p>ET8a. Area (ha) of woodland</p> <p>ET8b. Extent and condition of key habitats for which Biodiversity Action Plans have been established</p> <p>ET8c. Number and distribution of designated sites including SPAs, Ramsar sites, Sites of Special Scientific Interest, National Nature Reserves, Local Nature Reserves and County Wildlife Sites and Regionally Importance Geodiversity Sites in Ipswich</p> <p>ET8d. Percentage of designated sites in favourable condition</p>	<p><a href="http://www.magic.gov.uk">www.magic.gov.uk</a></p> <p>Suffolk Biodiversity Action Plan</p> <p>Natural England</p> <p>GeoSuffolk website</p> <p>SBRC</p>
ET9	To conserve and enhance the historic environment, heritage assets and their settings	<ul style="list-style-type: none"> <li>▪ Would the policy protect and enhance historic buildings and sites and their setting?</li> <li>▪ Would the policy contribute to the protection and enhancement of historic landscape / townscape value?</li> </ul>	<p>ET9a. Number of heritage assets 'at risk'</p> <p>ET9b. Number of listed buildings reviewed annually for condition, repair and 'at risk' status</p>	<p>English Heritage</p> <p>Ipswich Borough Council</p>

SA Objective			SA Indicator	Source
ET10	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	<ul style="list-style-type: none"> <li>▪ Would new developments protect and enhance landscape character and quality?</li> <li>▪ Would new developments protect and enhance townscape character and quality?</li> <li>▪ Would new developments promote sensitive design in development?</li> <li>▪ Would new developments promote local distinctiveness?</li> </ul>	ET10a. Percentage of new housing completions achieving design standards such as Building for Life and Lifetime Homes	Ipswich Borough Council
HW1	To improve the health of those most in need	<ul style="list-style-type: none"> <li>▪ Would the implementation of the policy improve access to health and social care services?</li> <li>▪ Would the policy contribute to a reduction in health inequalities amongst different groups in the community?</li> <li>▪ Would new developments promote healthy lifestyles?</li> </ul>	<p>HW1a. Proportion of population with access to hospital / GP / Dentist</p> <p>HW1b. Proportion of journeys to work by foot or by bicycle</p> <p>HW1c. How children travel to school (Quality of Life Indicators (Government indicators) / Best Value Performance Indicators (Ipswich Borough Council))</p>	Ipswich Borough Council 2001 and 2011 Census ONS
HW2	To improve the quality of life where people live and encourage community participation	<ul style="list-style-type: none"> <li>▪ Would new development encourage community participation?</li> <li>▪ Would new development protect residential amenity from pollution?</li> <li>▪ Would new developments minimise noise and light pollution?</li> </ul>	<p>HW2a. Play and open space quality, quantity and accessibility</p> <p>HW2b. Percentage of residents who are happy with their neighbourhood as a place to live (Place Survey)</p> <p>HW2c. Number of noise and light pollution complaints</p>	Ipswich Borough Council Department for Communities and Local Government
ER1	To reduce poverty and social exclusion	<ul style="list-style-type: none"> <li>▪ Would the policy contribute to reduced overall levels of deprivation?</li> </ul>	<p>ER1a. Proportion of population who live in wards that rank within the 10% most deprived in the country</p> <p>ER1b. Provision of childcare</p>	<a href="http://www.communities.gov.uk">www.communities.gov.uk</a> Ipswich Borough Council / Suffolk County Council

SA Objective			SA Indicator	Source
ER2	To offer everybody the opportunity for rewarding and satisfying employment	<ul style="list-style-type: none"> <li>▪ Would the policy contribute to a reduction in unemployment in the areas most at need?</li> <li>▪ Would new developments improve physical accessibility to jobs for those in greatest need?</li> <li>▪ Would the policy ensure people are educated, trained and skilled to meet local economic needs?</li> <li>▪ Would the policy ensure labour supply meets local economic needs?</li> </ul>	<p>ER2a. Working age unemployment</p> <p>ER2b. Employment by occupation</p> <p>ER2c. Youth unemployment data</p>	<p>ONS / National Online Manpower Information System (NOMIS)</p> <p>Ipswich Borough Council</p> <p><a href="http://www.communities.gov.uk">www.communities.gov.uk</a></p>
ER3	To help meet the housing requirements for the whole community	<ul style="list-style-type: none"> <li>▪ Would the policy ensure that there is sufficient housing to meet identified needs in all areas?</li> <li>▪ Would new developments ensure that housing meets acceptable standards?</li> <li>▪ Would new developments increase the availability of affordable housing?</li> </ul>	<p>ER3a. Number of new dwellings completed in Ipswich including affordable housing</p> <p>ER3b. Percentage split of dwelling types</p> <p>ER3c. Average house price</p> <p>ER3d. Number of people presenting themselves as homeless.</p>	<p>Suffolk Observatory</p> <p>ONS</p> <p>Ipswich Borough Council</p>
ER4	To achieve sustainable levels of prosperity and economic growth throughout the plan area	<ul style="list-style-type: none"> <li>▪ Would the policy encourage new business formation?</li> <li>▪ Would the policy increase and diversify employment opportunities?</li> <li>▪ Would the policy encourage economic growth?</li> <li>▪ Would the policy ensure sufficient land, buildings and premises are available to accommodate business start-up and growth?</li> <li>▪ Would the policy ensure Infrastructure (including transportation) meets the needs of business?</li> </ul>	<p>ER4a. Planning consents for employment uses</p> <p>ER4b Take up of employment land</p> <p>ER4c Population in Employment</p>	<p>Ipswich Borough Council (Monitoring reports)</p> <p>ONS – Nomis</p> <p><a href="http://www.nomisweb.co.uk">www.nomisweb.co.uk</a></p>

SA Objective			SA Indicator	Source
ER5	To support vital and viable town, district and local centres	<ul style="list-style-type: none"> <li>▪ Would new developments maintain and improve access to shops, services and facilities in centres?</li> <li>▪ Would new developments ensure a mix of retail units in centres?</li> </ul>	<p>ER5a. No. / Percentage of vacant retail units</p> <p>ER5b. Commercial / retail rental data</p> <p>ER5c Percentage of new retail floorspace developed within defined centres.</p>	<p>Ipswich Borough Council</p> <p><a href="http://www.communities.gov.uk">www.communities.gov.uk</a></p>
ER6	To encourage efficient patterns of movement in support of economic growth	<ul style="list-style-type: none"> <li>▪ Would the policy ensure sufficient land, buildings and premises are available to accommodate business start-up and growth?</li> <li>▪ Would the policy ensure Infrastructure (including transportation) meets the needs of business?</li> <li>▪ Would the policy ensure that public transport services meet people's needs i.e. through new bus services?</li> <li>▪ Would the policy ensure that highways infrastructure meets people's needs (including walking and cycling routes)?</li> <li>▪ Would the policy promote the use of sustainable travel modes and reduce dependence on the private car?</li> <li>▪ Would the policy reduce the impact of traffic on the economy?</li> </ul>	<p>ER6a No. / percentage of people working from home</p> <p>ER6b Waiting times at junctions in Ipswich</p> <p>See also ET4a (employment land take up) and HW1b (journey to work)</p>	<p>Ipswich Borough Council</p> <p>Suffolk County Council</p>

SA Objective			SA Indicator	Source
ER7	To encourage and accommodate both indigenous and inward investment	<ul style="list-style-type: none"> <li>▪ Would the policy encourage inward investment and new business formation?</li> <li>▪ Would the policy support the preservation and / or development of a high quality built environment?</li> <li>▪ Would the policy promote the development of multi-functional green infrastructure in urban areas?</li> <li>▪ Would the policy enhance the reputation of urban areas as places to live, work and visit?</li> </ul>	<p>ER7a. Business start-ups and closures</p> <p>ER7b. No. of business enquiries to Ipswich Borough Council / Suffolk County Council by types and size of site</p> <p>ER7c. Employment land availability</p>	<p>Ipswich Borough Council</p> <p>Suffolk County Council</p>
CL1	To maintain and improve access to education and skills for both young people and adults	<ul style="list-style-type: none"> <li>▪ Would new development increase levels of participation and attainment in education for all members of society?</li> <li>▪ Would new development improve access to and involvement in lifelong learning opportunities?</li> <li>▪ Would new developments improve the provision of education and training facilities?</li> </ul>	<p>CL1a. GCSE Attainment Levels (Grades A*-C)</p> <p>CL1b. Proportion of the population with no qualifications</p>	<p>ONS</p> <p><a href="http://www.communities.gov.uk">www.communities.gov.uk</a></p>
CD1	To minimise potential opportunities for crime and anti-social activity	<ul style="list-style-type: none"> <li>▪ Would the policy contribute to a reduction in crime levels?</li> <li>▪ Would the policy contribute to a reduction in the fear of crime?</li> <li>▪ Would the policy contribute to a reduction in levels of anti-social behaviour?</li> <li>▪ Would new developments encourage safety by design?</li> </ul>	<p>CD1a. Recorded crime per 1,000 population</p> <p>CD1b. Burglary Rate</p> <p>CD1c. Fear of Crime (Quality of Life, Suffolk Speaks, British Crime Survey)</p> <p>CD1d. Number of domestic noise complaints</p>	<p>ONS</p> <p><a href="http://www.communities.gov.uk">www.communities.gov.uk</a></p> <p>Ipswich Borough Council</p>



## SA Objective Compatibility

- 2.3.24 The 21 SA Objectives have been tested against each other to identify any potential areas of internal incompatibility. The results are presented in Table 2-4 and summarised below.
- 2.3.25 Generally the SA Objectives were either compatible or no clear impacts between the objectives could be established. However, some uncertainties were identified. Compatibility was assessed as uncertain between SA Objective ER3 'To help meet the housing requirements for the whole community' and the following SA Objectives:
- ET1: *'To improve air quality'*
  - ET2: *'To conserve soil resources and quality'*
  - ET3: *'To reduce waste'*
  - ET4: *'To reduce the effects of traffic upon the environment'*
  - ET6: *'To limit and adapt to climate change'*
  - ET7: *'To protect and enhance the quality of water features and resources and reduce the risk of flooding'*
  - ET8: *'To conserve and enhance biodiversity and geodiversity'*
  - ET9: *'To conserve and enhance the historic environment, heritage assets and their settings'*
  - ET10: *'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes'*
- 2.3.26 Uncertainty was identified because new residential development has the potential to adversely affect biodiversity resources through direct land take, landscape and heritage resources through inappropriate siting and water resources through an increase in water demand / consumption. In addition, new residential development would also require the use of natural resources, raw materials and energy, and would increase pressure upon current waste management.
- 2.3.27 There could also be an increase of traffic during the construction / operation of new residential development associated with an increase of inhabitants and their future transport requirements therefore this could affect local air quality and climate change.
- 2.3.28 However, some of these uncertainties could be addressed through the SPD, by requiring developments to meet Code for Sustainable Homes standards, promoting sustainable travel, and including measures to protect and enhance biodiversity.

The following notations are used in Table 2-4:

Objectives are compatible	= +	No clear impact on each other	= 0
Mutually incompatible	= -	Compatibility unknown	= ?

Table 2-4 Internal Compatibility of SA Objectives

	ET1	ET2	ET3	ET4	ET5	ET6	ET7	ET8	ET9	ET10	HW1	HW 2	ER1	ER2	ER3	ER4	ER5	ER6	ER7	CL1	CD1	
ET1																						
ET2	0																					
ET3	+	+																				
ET4	+	+	0																			
ET5	+	?	0	+																		
ET6	+	+	+	+	?																	
ET7	0	+	+	+	0	+																
ET8	+	+	+	+	0	+	+															
ET9	0	0	0	0	0	0	0	+														
ET10	+	+	+	+	0	+	+	+	+													
HW1	+	0	0	0	+	0	0	0	0	0												
HW2	0	0	+	+	+	0	+	+	+	+	+											
ER1	0	0	0	0	+	0	0	+	+	+	+	+										
ER2	0	0	0	0	+	0	0	0	0	0	0	0	+									
ER3	?	?	?	?	0	?	?	?	?	?	0	+	+	+								
ER4	0	0	0	0	+	0	0	0	0	0	0	+	+	+	+							
ER5	0	0	0	0	+	0	0	0	+	0	0	+	+	+	+	+						
ER6	+	+	0	0	+	+	0	+	0	0	0	+	+	+	+	+	+					
ER7	0	0	0	+	+	+	+	0	0	0	0	0	+	+	+	+	0	+				
CL1	0	0	0	+	+	0	0	0	0	0	0	+	+	0	+	+	0	0	0			
CD1	0	0	0	0	+	0	0	0	0	0	0	+	+	+	0	+	+	0	0	0	+	

## SA Scoping Report

2.3.29 The SA process commenced in 2013 with the preparation of an SA Scoping Report for the Core Strategy Focused Review and the Site Allocations DPD (Hyder Report Reference: 001-UA006314-UE31-01). The Scoping Report was in two parts – Part One covered the Core Strategy and Part Two, the Site Allocations DPD. Part Two of the Scoping Report contained:

- Characterisation of the environmental, social and economic baseline within the Ipswich area;
- A review of relevant plans, programmes and environmental protection objectives that could influence the SA and the development of the Site Allocations DPD;
- Identification of key sustainability issues and opportunities, together with recommendations for mitigation where required; and
- Review of the SA Framework against which the policy changes of the Site Allocations DPD have been assessed.

### Geographical Scope of the Appraisal

2.3.30 The Scoping Report set out the scope and approach to the assessment of the Site Allocations DPD. The geographical scope of the SA has been driven by the geographical scope of the Site Allocations DPD. The Site Allocations DPD will apply to the whole of the Borough. The SA therefore considered the spatial extent of its likely impacts. In some cases, this may only within the local area but in other cases, the impacts of the policies and site allocations may be felt over a wider area within the Borough or outside the Borough (i.e. in adjacent districts - Suffolk Coastal, Babergh and Mid Suffolk Local Authorities). Similarly, the cumulative effects of the policies may result in impacts occurring over a wider area (i.e. in-combination with other development across the Borough). This was also considered in the SA.

### Temporal Scope of the Appraisal

2.3.31 The Site Allocations DPD sets out the framework for facilitating the determination of future planning applications within the Ipswich area until 2031.

### Topics Covered in the Appraisal

2.3.32 The SA comprises the consideration of the environmental, social and economic effects of the Site Allocations DPD. The baseline characterisation has therefore reflected the topics set out in the SEA Directive, but also considers relevant additional social and economic topics as recommended in the PAS SA guidance. Table 2-5 identifies the topics covered, together with their relationship with the topics listed in Annex I of the SEA Directive.

Table 2-5 Topics Covered in the SA and Relevant SEA Directive Topics

Topics covered in the SA	Relevant topics listed in Annex I of the SEA Directive
Population	Population and Human Health Material Assets
Education and Qualifications	Material Assets
Health	Population and Human Health Material Assets
Crime	Population and Human Health
Water	Water and Soil
Soil and Land Quality	Water and Soil Material Assets
Air Quality	Air
Energy and Climate Change	Climatic Factors
Biodiversity, Flora and Fauna	Biodiversity, Flora and Fauna
Cultural Heritage	Cultural heritage and landscape
Landscape	Cultural heritage and landscape
Minerals and Waste	Material Assets
Transportation	Material Assets
Economy	Material Assets
Deprivation and Living Environment	Population and Human Health Material Assets
Housing	Material Assets

2.3.33 Annex I of the SEA Directive also requires an assessment of secondary, cumulative and synergistic effects, the results of which are provided in Chapter 4. Transboundary impacts on neighbouring authorities are considered inherently throughout the assessment.

## Consultation

2.3.34 The Scoping Report was issued for public consultation from 25th October to 28th November 2013, for a five week consultation period. It was issued to the three statutory consultees (the Environment Agency, English Heritage and Natural England) and key stakeholders through the report's availability on the council's website.

2.3.35 The aim of the scoping consultation was to obtain comment and feedback upon the scope and level of detail of the SA. The consultation comments have been considered and taken into account in the preparation of this Interim Report. Appendix D presents the comments from the scoping consultation.

2.3.36 This Interim Report is being issued for consultation from 13th January 10th March 2014. The consultation comments will inform the next stage of the development of the DPD.

## 2.4 Stage B: Developing and Refining Options and Assessing Effects

### Background to the Site Allocations DPD SA

- 2.4.1 The combined SA of the Core Strategy Preferred Options, IP-One Area Action Plan and Site Allocations and Policies DPD (2007) assessed the options for the Site Allocations and IP-One Area Action Plan.
- 2.4.2 The Preferred Options Site Allocations and Policies DPD produced in November 2007 did not contain a vision or objectives since these were contained within the Core Strategy document. It contained three Policy Areas which apply to sites or areas within the Borough of Ipswich but outside the IP-One Area Action Plan area. It also contained a series of proposed site allocations for different uses e.g. residential, office, etc.
- 2.4.3 Consultation on the Issues and Options for both the proposed DPDs was undertaken in January and February 2005. Further consultation was undertaken on specific sites and possible use options in June 2006. A final stage of Issues and Options consultation took place in February 2007 when further sites and possible options were put forward following them being suggested during the 2006 consultation.
- 2.4.4 The Preferred Options Site Allocations and Policies DPD set out three policies that focus on sites that may be allocated for physical development, or retained for open space or nature conservation purposes. The Preferred Options IP-One Area Action Plan set out twenty four policies suggesting uses for identified land areas and site allocations in the town centre of Ipswich. Alternative policies were considered in both documents and were assessed against the SA Objectives.
- 2.4.5 The decision to combine the two plans was taken through the Council's fifth revision of the Ipswich Local Development Scheme, which was brought into effect in August 2012.

### Assessing the Effects of the Site Allocations DPD

- 2.4.6 The following elements of the now combined Site Allocations and Policies DPD have been assessed in this Interim SA:

**Table 2-6 Elements of the Site Allocations and Policies DPD**

<b>Area Based Policies</b>	
	DM33 Green corridors
	DM34 The ecological network
	DM35 Countryside
	CM36 Employment areas
	DM37 District and Local Centres
<b>Site Allocations</b>	
	DM38 The protection of allocated sites
	DM39 Land allocated for housing
	DM40 Land with planning permission or awaiting a Section 106 Agreement

	DM41 Land allocated for Gypsy and Traveller sites
	DM42 Land allocated for employment use
	DM43 Land allocated and protected as open space
	DM44 Land allocated for leisure uses or community facilities
	DM45 Safeguarding land on development sites for transport infrastructure
	DM46 Port of Ipswich
<b>IP-One Area Action Plan Policies</b>	
	DM47 Central Shopping Area
	DM48 Primary, Secondary and Speciality Shopping Areas and Frontages
	DM49 Retail Site Allocations
	DM50 District and Local Centres within IP-One
	DM51 Town Centre Boundary
	DM52 The Waterfront
	DM53 Education Quarter
	DM54 Arts, Culture and Tourism
	DM55 Improving Pedestrian and Cycle Routes
	DM56 Transport Proposals in IP-One
	DM57 Town Centre Car Parking
<b>IP-One Opportunity Areas</b>	
	Island Site
	Merchant Quarter
	Mint Quarter and surrounding area
	Education Quarter and surrounding area
	Westgate
	River Corridor and Princes Street Corridor

- 2.4.7 For the assessment of site allocations, the sites were grouped into 26 assessment groups. The grouping was based on geographical location and several sites in an area were grouped together. The groupings also took account of the Ipswich Area Committees. The groups included: Ipswich North West, Ipswich North East, Inner Western Ipswich, Ipswich South West, Ipswich South East and IP-One.
- 2.4.8 Each group of sites was assessed against the SA objectives in Appraisal Tables (Appendix F). One table was produced for each site assessment group, comparing each site allocation against each of the 21 SA Objectives topics. This approach provides a better understanding of the likely effects of the site allocations as the group of sites within an area can be considered together and will facilitate the assessment of cumulative impacts.
- 2.4.9 The detailed matrices determined significant impacts derived from the following:
- Impact – whether the impact will be positive, negative or neutral when assessed against the SA Objectives.
  - Temporal scale – whether the impact will be short-term (within 5 years), occur in the medium term (5 – 10 years) or occur in the long-term (10 years +).
  - Spatial scale – whether the impact will be realised a local level or a Borough wide level. Any transboundary effects outside of the study area would also be considered.
  - Permanency – whether effects will be permanent or temporary.
  - Level of uncertainty – the level of uncertainty in the prediction will be classified as low, medium or high.
- 2.4.10 The revised policies were assessed against the SA Objectives and the matrix provides commentary and recommendations for further development. Notations used in the assessment of the options and policies are presented in Table 2-6 below.

**Table 2-7 Notations used in the appraisals**

Major Positive Impact	The policy strongly supports the achievement of the SA Objective.	<b>++</b>
Positive Impact	The policy partially supports the achievement of the SA Objective.	<b>+</b>
Neutral/ No Impact	There is no clear relationship between the policy and / or the achievement of the SA Objective or the relationship is negligible.	<b>0</b>
Positive and negative outcomes	The policy has a combination of both positive and negative contributions to the achievement of the SA Objective, e.g. a short term negative impact but a longer term positive impact.	<b>+/-</b>
Uncertain outcome	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation at the local level. More information is required to assess the impacts.	<b>?</b>
Negative Impact	The policy partially detracts from the achievement of the SA Objective.	<b>-</b>
Major Negative Impact	The policy strongly detracts from the achievement of the SA Objective.	<b>--</b>

2.4.11 The assessment of the DPD also made use of Geographical Information Systems (GIS) to identify the relationship between the DPD and the existing environmental and sustainability features, for example designated sites or areas of socio-economic deprivation.

2.4.12 The assessment made good use of the baseline data, which was updated during the assessment process. When assessing each element, the questions asked included:

- To what extent does the policy/site allocation meet the SA Framework Objectives?
- To what extent will the policy/site allocation seek to address sustainability problems?
- To what extent will the policy/site allocation affect the current sustainability baseline conditions?

## Mitigation Measures

2.4.13 Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Site Allocations DPD. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified.

## Appraisal of Cumulative and Synergistic Effects

2.4.14 The SEA Directive requires inter alia that cumulative effects should be considered. It stipulates consideration of “the likely significant effects on the environment...” and that “These effects should include secondary, cumulative, synergistic...effects” (Annex I). The Practical Guide sets out the following definitions for these terms:

- Secondary or indirect effects comprise effects which do not occur as a direct result of the proposed activities, but as a result of complex causal pathway (which may not be predictable).
- Cumulative effects arise from a combination of two or more effects, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan or programme have a combined effect.
- Synergistic effects – synergy occurs where the joint effect of two or more processes is greater than the sum of individual effects.

2.4.15 The potential for cumulative, synergistic or secondary or indirect effects as a result of the Site Allocations DPD has been inherently considered within the appraisal, the findings of which are presented in Section 4.7.

## Appraisal of Transboundary Effects

2.4.16 The SEA Directive also requires SAs to consider the transboundary effects of the plan on other EU member states. These effects have been noted where appropriate throughout the assessment.

## Technical Limitations and Uncertainties

2.4.17 During the assessment of the Site Allocations DPD, there has sometimes been uncertainty when predicting the potential effects. Where this has occurred, the uncertainty is identified



within the appraisal matrices and accompanied by recommendations to preclude/mitigate any negative impacts.

2.4.18 In addition, a number of data gaps are identified within the baseline context where data is unavailable or out of date. Obtaining these datasets would help to further increase the knowledge of the areas, and could potentially be filled through the use of the monitoring framework.

2.4.19 Finally, the Site Allocations DPD essentially acts as a guidance document for the future development of Ipswich. There is therefore reliance upon future decision-makers to ensure sustainable development is ensured.

## 2.5 Stage C: Preparation of the SA Report

2.5.1 This Interim SA Report presents the findings of the assessments to-date including the information collated in Stage A and during scoping, and documents the entire SA process. The results of the appraisal together with any mitigation measures proposed are recorded in the remaining chapters of this document.

## 2.6 Stage D: Consultation on the Core Strategy and the SA Report

2.6.1 This Interim SA Report has now been issued for informal consultation alongside draft Site Allocations DPD to all key stakeholders (including statutory consultees and the public) for comment. Following the close of the consultation period, IBC will review the feedback and revise the plan as appropriate. Following the consultation, the draft SA Report will be prepared prior to the formal consultation.

## 3 APPRAISAL OF THE ALTERNATIVES

### 3.1 Alternative Vision and Objectives

3.1.1 The Core Strategy vision and objectives provides for the context for the Site Allocations plan. The Preferred Options Site Allocations and Policies DPD produced in 2007 does not contain a vision or objectives. However, the IP-One Area Action Plan provided a vision and objectives, which were assessed in the Complete Preferred Options SA (2007). The draft Site Allocations and Policies DPD (2013) does not present alternative vision or objectives. As such, no alternative visions or objectives have been assessed.

### 3.2 Alternative Policies

3.2.1 The draft Site Allocations and Policies DPD does not include alternatives to policies. Alternative policies were assessed in the Preferred Options SA in 2007. This is discussed in Section 2.6.

### 3.3 Alternative Site Allocations

3.3.1 Since the Preferred Options SA was prepared in 2007, some sites that were included in the Preferred Options Document are not included in the draft Site Allocations and Policies DPD as allocations. These sites are listed in Appendix D and the reasons for the changes. The sites were identified through the Council's urban capacity study, which included large back gardens. Subsequent consultation with landowners has led to many such sites being withdrawn as undeliverable. Other sites have been developed since 2007 and are therefore omitted from the draft Site Allocations and Policies DPD.

3.3.2 The draft Site Allocations and Policies DPD includes 94 sites, of which 30 sites are with planning permission/awaiting Section 106 Agreement. Alternative uses were identified for these sites and the proposed allocation was compared against the alternatives with reference to their contribution to or impact on the SA Objectives (see Appendix D).

3.3.3 The findings of the alternatives assessment are presented in Appendix D. For some allocations, it is recommended that the Council should consider the proposed allocation further due to the site's sensitivity, the site being greenfield or the potential for significant impacts. These site allocations include:

- IP032 – King George V Field, Old Norwich Road
- IP037 – Island Site
- IP058 – Former Volvo Site, Raeburn Road South
- IP116 – St Clements Hospital Grounds
- IP140a, b and c – Land North of Whitton Lane
- IP149 – Pond Hall Carr and Farm
- IP262 – Ash Tip, Cliff Quay

# 4 APPRAISAL OF THE SITE ALLOCATIONS DPD

## 4.1 Introduction

4.1.1 This section outlines the results of the appraisal of the Site Allocations DPD including details of mitigation measures that could be implemented to improve the performance of the plan.

## 4.2 Appraisal of Vision and Objectives

4.2.1 The Core Strategy vision provides for the context for the Site Allocations plan. The Focused Review Core Strategy vision includes minor changes to update the vision contained in the adopted Core Strategy. These are mainly additional text on open spaces, green infrastructure, improved ecological networks and tree canopy cover, which strengthens it and provides more detail. As the vision has not changed significantly, the previous SA still applied and there was no need for a new assessment.

4.2.2 The changes to the Core Strategy Objectives are also minor, The main change is to the Objective 3 figures relating to new dwellings has changed from 14,000 to 13,550 and the target of developing new dwellings on 60% previously developed land has been deleted. As these are strategic objectives, where the aim is to provide new dwellings, the previous SA still applies. The change in figures is reflected in the change to Policy CS7, which requires a new assessment, which has been assessed in the Core Strategy Focused Review Interim SA.

## 4.3 Appraisal of Area Based Policies

4.3.1 Area Based Policies included the following:

- **DM33 Green Corridors**
- **DM34 The Ecological Network**
- **DM35 Countryside**
- **DM36 Employment Areas**
- **DM37 District and Local Centres**

4.3.2 The detailed assessment is presented in Appendix E. The findings are discussed below:

### **DM33 Green Corridors and DM34 The Ecological Network**

4.3.3 Policy DM33 Green Corridors and Policy DM34 The Ecological Network, were recorded with both positive and neutral scores. The policies seeks to establish an ecological network, create and enhance green corridors within the Borough, link to adjacent open spaces and walking cycling or riding routes. The provision of green corridors would provide increased connectivity within the Borough, which would improve access to key services and would encourage sustainable travel. These in turn would help to reduce the effects of traffic upon the environment and improve local air quality supporting SA Objectives ET1 (air quality), ET4 (traffic) and ET5 (access).

4.3.4 The policies both scored major positively for ET8 'To conserve and enhance biodiversity and geodiversity including favourable conditions on SSSI, SPAs and SACs' as they seek to provide

vital connections between habitats for use by wildlife. Policy DM34 in particular seeks to discourage development that would have adverse effects on protected designated wildlife sites.

- 4.3.5 The establishment of attractive green corridors and an ecological network within the Borough would support SA Objective ET10 (local distinctiveness) by contributing to the enhancement of local landscape by encouraging development to incorporate measures such as retaining existing habitat features, tree planting, comprehensive landscaping. These features in turn could support safety by design and reduce the incidence of crime and anti-social behaviour. The policies would make contributions to SA Objectives HW1 (health) and HW2 (quality of life) as the provision of green corridors would help to encourage healthier lifestyles as well as improving the places where people live. For Policy DM33, positive scores were also recorded against the economic SA Objectives (ER4, ER5 and ER6) as the provision of key green links within the Borough would enhance connectivity providing convenient routes to key services which would support the viability of centres whilst encouraging efficient patterns of movement and helping to support economic growth. For Policy DM34, a positive score was recorded against ER4 but neutral scores were recorded against ER5 and ER6. The policies scored neutrally against ET3, ET7, ET9, ER1, ER2, ER3 ER7, CL1 and CD1.

#### **DM35 Countryside**

- 4.3.6 Policy DM35 Countryside seeks to support the countryside through permitting development that respects and retains its open character. The majority of scores recorded were neutral. The Policy scored positively against ET1 (air quality), ET2 (soil resources) and ET4 (traffic) as it seeks to retain countryside and its character therefore would conserve soil resources and encourages the use of sustainable modes of transport which would contribute to reducing traffic and its effects on the environment.
- 4.3.7 Policy DM35 also supports SA Objective ET8 (biodiversity) and ET10 (local distinctiveness) as it seeks to protect designated wildlife sites and protect, enhance and restore where possible the links between. The policy favours proposals that have regard to the wildlife corridor function in their design and layout and it supports new tree planting and soft landscaping which encourages biodiversity and contributes to creating local distinctiveness.
- 4.3.8 In addition, policy DM35 supports SA Objective HW1 'To improve the health of those most in need', HW2 'To improve the quality of life' where people live and encourage community participation'. However, a neutral score has been recorded against ER6 'To encourage efficient patterns of movement in support of economic growth' since this policy focuses on safeguarding the countryside. The policy encourages sustainable travel such as walking and cycling which would help to encourage efficient patterns of movement within the Borough and improve health and the quality of life where people live.

#### **DM36 Employment Areas**

- 4.3.9 Policy DM36 seeks to safeguard employment areas within the Borough. Scores recorded against the SA Objectives are both positive and negative. The policy scored positively and negatively against ET1 'To improve air quality'. The provision of employment areas would result in the regular influx of private vehicles which would increase vehicular emissions and negatively impact air quality and the effects of emissions on the environment. The provision of employment areas across the Borough within DM36 will provide convenient access for people to go to work and use local services. This in turn may help to encourage people to make more sustainable transport choices in the long term and contribute towards reducing the effects of traffic upon the environment. However, the employment areas may also increase the influx of private cars to these areas. The policy has therefore scored both positively and negatively against ET4 'To reduce the effects of traffic upon the environment'. In addition, the cumulative effects of this Policy with the provision of green corridors and an ecological network with DM33 and DM34

would serve to encourage sustainable transport use and offer some mitigation against negative effects to the environment.

- 4.3.10 Policy DM36 scored negatively against ET3 'To reduce waste' as the provision of employment land would result in industrial activities within this area and an associated increase in waste production.
- 4.3.11 Policy DM36 also scored negatively against SA Objective ET2 'To conserve soil resources and quality' as development would see some loss of greenfield land and soil.
- 4.3.12 The cumulative effects of policy DM36, DM33 and DM34 would mean enhanced connectivity which would help to encourage the use of sustainable transport modes which would benefit SA Objective ET4 (traffic) and ER6 (efficient patterns of movement) by reducing traffic effects on the environment and encouraging sustainable patterns of movement.
- 4.3.13 Policy DM36 scored neutrally against ET9 'To conserve and enhance the historic environment, heritage assets and their settings'. New employment areas are designated under this policy. Ipswich Business Park designated employment area of DM36 is located approximately 125m northwest of Whitton Lodge Grade II Listed Building. Corporation Farmhouse Grade II Listed Building is approximately 100m west of an existing employment area. However as the Listed Buildings are not within very close proximity of employment areas, no negative effects are considered likely. As for the Airport Farm Kennels site, the nearest Listed Building is approximately 500m away and no negative effects are considered likely. The site may be a possible area of archaeological importance but this is uncertain. Policy DM36 scored negatively against ET10 'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes' since the Airport Kennels site is partly located in an Area of Outstanding Natural Beauty and changing its current agricultural use to a park and ride facility is likely to affect landscape character.
- 4.3.14 Policy DM36 scored major positively against ER2 (employment) as it seeks to safeguard employment areas within the Borough and provide accessible employment. The Policy also supports the following SA Objectives:
- ER4 'To achieve sustainable levels of prosperity and economic growth throughout the plan area'
- ER5 'To support vital and viable town, district and local centres'
- ER6 'To encourage efficient patterns of movement in support of economic growth'
- ER7 'To encourage and accommodate both indigenous and inward investment'
- These SA Objectives are supported by the policy DM36 as it provides job opportunities close to where people live and close to Local and District Centres, all of which will help to achieve sustainable levels of prosperity, encourage inward investment and economic growth and support the vitality and viability of town centres.

## DM37 District and Local Centres

- 4.3.15 Policy DM37 District and Local Centres recognises the important role of District and Local Centres within local communities. The policy scored both positively and negatively against the SA Objectives. Positive and negative scores were recorded against SA Objective ET1 (air quality) and ET3 (waste) as the development of District and Local Centres may partially contribute to increased vehicular use as well as increased waste, which could negatively affect air quality and the environment. However, the widespread distribution of these centres would allow for more convenient access for local residents to services which would promote more sustainable travel.
- 4.3.16 Policy DM37 scored major positively against SA Objective ET5 'To improve access to key services for all sectors of the population' and ER 5 'To support vital and viable town, district and local centres'. The policy seeks to provide Local and District Centres and recognises the key roles these centres playing meeting local needs in convenient locations to residents. The policy scored negatively against ET9 'To conserve and enhance the historic environment, heritage assets and their settings' as there are Listed Buildings in the vicinity of Local and District Centres and there is potential for new developments to have an impact on Listed Buildings and sites of historical importance during construction periods. There were positive scores recorded against ET10 (local distinctiveness), HW2 (quality of life), ER1 (poverty) and CL1 (education) as the development of centres where needed, would enhance local distinctiveness and would help to encourage healthier lifestyles due to convenient locations. The policy would also contribute to the provision of community facilities used for training or learning within centres, which may help to improve access to skills and help to reduce social exclusion.
- 4.3.17 The policy also scored positively against the economic SA Objectives (ER2, ER4, ER6, ER7) as new centres would provide the opportunity for economic growth, inward investment and employment opportunities.

## Recommendations for Mitigation Measures

- 4.3.18 The following recommendations were identified to strengthen the DM Policies:
- Policy DM36 should make reference to public transport facilities associated with the new employment areas at Ipswich Business Park north of Whitton Lane and Airport Farm Kennels Farm south of Ravenswood.
  - Policy DM36 and DM37 should include reference to the provision of adequate waste facilities and where possible recycling facilities within employment areas and District and Local District Centres.
  - Policy DM36 should make reference to the use of SuDS to reduce flood risk and improve water quality.
  - Policy DM33 and DM34 should make reference to incorporating safety by design which would contribute towards reducing the potential for crime and anti-social activities.

## 4.4 Appraisal of Site Allocations

4.4.1 The more detailed assessment of the site allocations is provided in Appendix F. A summary of the findings is presented in the section below grouped in tables depending on the proposed site use, e.g. housing, employment, etc.

### **Policy DM38 The protection of allocated sites**

This policy safeguards the uses of allocated sites. The Council provides a commitment that it will only permit alternative uses on allocated sites if compatible with plan objectives and that the site is no longer needed or viable. This commitment would ensure that the assessments of the allocations would still be valid. However, if alternative uses are proposed, these may not address the SA objectives as the original allocation. It is recommended that the Council re-ass the alternative uses against the SA Objectives.

### **Policy DM39 Land Allocated for Housing**

Policy DM39 provide the detailed allocation for housing. These include sites allocated for residential development or part residential development within mixed use developments and Sites with Planning Permission or Awaiting a Section One Agreement. This policy would contribute positively to HW2 (housing) and indirectly, H1 (health) SA Objectives through improved housing provision. Where the proposed allocation includes mixed uses, these would also address economic and employment objectives. Depending on the location of the housing allocation, there are potential impacts on biodiversity (such as those in greenfield land), traffic (sites near AQMAs) and flood risk (sites located in flood zones). Where the sites are near listed buildings, there are potential impacts on heritage resources and townscape. Residential developments usually increase traffic due to an increase in private car use. Those site allocations which are located in IP-One, where there is access to public transport provide more sustainable choices, which may reduce impacts on traffic and air quality. The detailed matrices are presented in Appendix F and a summary table is set out below.

## Policy DM39 Land Allocated for Housing

Site Allocation	Location	Significant Findings
<p>IP010a: Co-op Depot, Felixstowe Road</p> <p>IP010b: Felixstowe Road</p> <p>IP257: Land at Felixstowe Road east of Malvern Close</p> <p>150a: Land at Ravenswood</p>	South East	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The site allocations largely scored positively against the SA Objectives. IP010a and IP010b would be developed on previously developed land though the potential for contaminated land has been identified. Proposed development at IP010a, IP010b, and IP257 would support SA Objective ET5 (access), ER5 (vital town centres) and ER7 (inward investment) as they are in close proximity to existing District Centre 23 which would improve access to key services in the long term whilst encouraging investment and supporting the viability and vitality of the District Centre. T. Negative scores were recorded against ET1 (air quality) and ET3 (waste) as the provision of housing would result in an influx of people and private vehicles which would negatively affect air quality and would result in more waste being produced.
<p>IP059a: Elton Park Industrial Estate</p> <p>IP121: Front of Pumping Station, Belstead Road</p> <p>IP061 School Site, Lavenham Road</p>	South West	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. Mixed scores recorded for IP059a, IP121, and IP061 against the SA Objectives. The increase of people and cars in the long term would have negative effects on air quality and the environment due to vehicular emissions and would increase waste production (ET1, ET3, ET4 and ET6). The proposed development is on brownfield land. The sites would support SA Objective HW1 (health), HW2 (quality of life) and ER1 (poverty) as they would improve the quality of housing stock and would contribute towards increasing the quality of life for residents.
<p>IP065: Former 405 Club, Bader House</p> <p>IP259: Former Hoylwells High School (buildings)</p>	South East	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. IP065 and IP259 largely scored positively against the SA Objectives. Development at these sites would offer the chance for investment and employment opportunities during the construction phase (ER2 and ER7). In the long term it would help to support economic growth, support the vitality and viability Local and District Centres and IP065 particularly would improve sustainable access to key services by providing greenspace links (ET5, ER4, ER5 and ER6). The sites would have a negative effect on SA Objectives ET1 (air quality), ET2 (soil resources), ET3 (waste), ET4 (traffic) and ET6 (climate change). This is due to increase of private vehicles which would affect air quality and climate change, development would be on previously undeveloped land and would increase waste production. IP065 would have the potential for drainage problems relating to increased surface runoff although due to IP259 replacing hard standing areas this would be beneficial for drainage. However, IP065 is expected to have both positive and negative impact on ET8 biodiversity since there is it is adjacent to the railway line and any development would have potential impact on the wildlife corridor.
<p>IP066: JJ Wilson, White Elm Street</p>	South East	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The site allocations largely scored positively against the SA Objectives. IP066 is located within an AQMA and IP150c seeks to develop a significant number of homes (162), additional traffic could contribute to increasing emissions and increasing their effects on the environment (ET1



Site Allocation	Location	Significant Findings
IP150c: Land south of Ravenswood		<p>and ET4). Development at IP066 would support SA Objective ET6, <i>'To limit and adapt to climate change'</i> by replacing existing buildings and land with modern techniques including insulation and heating methods which would replace existing inefficient practices with modern standards.</p> <p>Development at each of the sites would also support SA Objective HW1 (health), HW2 (quality of life) and ER1 (poverty) as it would improve the quality of housing stock and would contribute towards increasing the quality of life for residents. Development would give employment opportunities and attract investment which would contribute to sustaining economic growth in the long term.</p>
IP172: 15-19 St Margaret's Green IP040 and IP041: Civic Centre Area / Civic Drive	IP One Area Central	<p>The sites would directly support ER3 (housing) by providing housing to meet housing requirements. Each of the sites scored positively and negatively for ET9 <i>"To conserve and enhance the historic environment, heritage assets and their settings"</i> as the site is located in an Area of Archaeological importance and near a Conservation Area. Both sites are to be developed on previously developed land and there is the potential to encounter contaminated land. However, remediation would help improve soil resources.</p> <p>The sites scored positively against SA Objective ET4, <i>'To reduce the effects of traffic upon the environment'</i> as the sites are located in close proximity to the primary and secondary shopping areas and this may reduce the need to travel by private car.</p> <p>The sites are not located in a flood risk area and there may be benefits for water if there are opportunities to remediate some historical areas of contamination.</p> <p>Site IP172 scored positively against SA Objectives HW1 (health), HW2 (quality of life), and ER6 (efficient patterns of movement) as the provision of quality housing close to Christchurch Park and close to land allocated for community and leisure use could help to encourage healthier lifestyles, efficient patterns of movement and community participation.</p> <p>Due to the location of IP040, in the central urban area of Ipswich access to facilities and shopping areas would be improved which would benefit SA Objective ET5 (access). The site scored positively against HW1 (health) as it could encourage community participation through the provision of homes close to community facilities.</p>
IP048: Mint Quarter / Cox Lane IP054: Land between Old Cattle Market and Star Lane IP011b: Smart Street, Foundation Street	IP One Area Central	<p>The sites would support the viability and vitality of centres due to the central location and it would directly support SA Objective ER3 (housing) by providing housing to meet community requirements. IP048, IP054 and part of IP011b scored negatively against SA Objective ET1 (air quality) as it is located close to an AQMA due to the potential increase in traffic from car use. In addition, there are potential negative effects associated with dust air and pollution during construction. IP048 also scored negatively against ET3 (waste) and ET8 (biodiversity) as it is likely to result in increased waste generation due to housing provision and the site has TPOs which may be affected by development. The site scored positively and negatively against ET9 (heritage assets) and ET10 (local distinctiveness) as it is located in a Conservation Area and in an Area of Archaeological Importance.</p> <p>Positive scores were recorded against ET4 (traffic), ER1 (poverty) and ET5 (access) as the central location of the site may encourage sustainable travel due to close proximity to key services and facilities which may also help to reduce social exclusion.</p> <p>IP011b and IP054 both scored negatively against ET3 (waste) as they would increase waste generated and cumulatively,</p>

Site Allocation	Location	Significant Findings
		negative effects against this SA Objective are expected with other developments in the IP One Area. IP054 is located within a Conservation Area. There are also listed buildings that could be affected by development at these sites and each of the sites is located within an Area of Archaeological Importance.
IP136: Silo College Street	IP One Area Central	The site would directly support ER3 (housing) by providing housing to meet housing requirements. The area along Star Lane, College Street, and Bridge Street is designated as AQMA and as a result of an increase in residents cumulatively in the immediate area and potential increase in traffic a negative score is recorded against ET1 and ET4. The site is located in Flood Zones 2 and 3 with a risk of flooding from the river Orwell. Positive scores are recorded with regards to health (HW1), quality of life (HW2), poverty and social exclusion (ER1), and vital town centres (ER5).
IP089: Waterworks Street  IP012: Peter's Ice Cream  IP043: Commercial Buildings and Jewish Burial Ground, Star Lane	IP One Area Central	<p>The sites would directly support ER3 (housing) by providing housing to meet housing requirements. Each of these sites is located close to an AQMA and the cumulative increase of people could generate traffic in the vicinity of Fore Street, Star Lane and Grimwade Street which would detract from SA Objective ET1 (air quality).</p> <p>The sites are on brownfield land and remediation measures of contaminated land (where appropriate) would help to improve soil resources (ET2). IP043 scored negatively against ET3 (waste) as the indicative capacity suggested a significant increase in waste if appropriate mitigation measures are not enforced. Listed buildings were found near to IP089 and IP043 (both in Conservation Areas) and each site is located within an Area of Archaeological Importance. The sites scored positively against ER6 (efficient patterns of movement) as the provision of housing close to existing/ future employment and shopping areas would encourage efficient patterns of movement and in the long term this could help to support economic growth.</p> <p>The sites also benefit SA Objective CL1 <i>'To maintain and improve access to education and skills for both young people and adults'</i> as the sites could contribute to improving access to the University Campus Suffolk. Student accommodation is proposed for IP012 and 65 student rooms are proposed for IP043.</p>
IP037 Island Site	IP One Area Central	<p>The site scored positively against ER3 <i>'To help meet the housing requirements for the whole community'</i> as it seeks to provide 271 homes however all of these dwellings are anticipated to be flats which may result in an oversupply of this type of housing in central Ipswich. The provision of this many homes would also increase private cars which would have a negative effect on air quality and climate change (ET1, ET4). The site would be developed on previously developed land and remediation measures would help to improve the soil resources (ET2). Waste production is likely to increase and due to the size of new development this is likely to be fairly significant. The site scored negatively against SA Objective CD1 <i>'To minimise potential opportunities for crime and anti-social behaviour'</i>. It is ranked in an area less deprived than those adjacent to it and in the short term may lead to an increase in crime levels. Although the site is located in central urban area, constraints have been identified with the potential increase in residents relating to the need to provide vehicular/pedestrian/cycle access via a new bridge. The site is located in flood zone 2 and 3, is surrounded by a designated county wildlife site and is close to an SPA south of the river Orwell therefore potential negative effects are associated with deterioration of air quality, water quality and disturbance to protected species. However, it should be noted that an Appropriate Assessment under the Habitats Regulations has been carried out to consider any potential impacts of the plan on the SPA, which does not identify potential impacts on the SPA from the Island Site redevelopment</p>

Site Allocation	Location	Significant Findings
		but potential harm to the SPA arises from dog walking on the foreshore by the SPA which disturbs birds. Therefore there may be increased potential impact from increased population and dog walking.
<p>IP098: Transco, south of Patteson Road</p> <p>IP142: Land at Duke Street</p>	IP One Area Central	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The sites are located close to an AQMA and as a result of an increase in residents cumulatively in the immediate area; traffic may be generated in the vicinity of Duke Street, A1156 and Fore Street. The sites would benefit ET2 (soil resources) as they are on previously developed land which is likely to be contaminated and through remediation the soil resources could be improved. The relatively central location of the sites could help to encourage more sustainable modes of transport in some cases and could help to improve access to key services (ET4). The sites could indirectly benefit health and quality of life (HW1 and HW2) as they are close to Holywells and Alexandra Park which could help to support healthier lifestyles for residents. Potential positive effects are associated with improving access to education as the University Campus Suffolk is located close to the sites (CL1).
<p>IP188: Websters Saleyard site, Dock Street</p> <p>IP039a: land between Gower Street and Gt Whip Street</p> <p>IP080: 240 Wherstead Road</p> <p>IP031: Burrell Road</p>	IP One Area South West	<p>The sites would directly support ER3 (housing) by providing housing to meet housing requirements. IP188, IP031, IP039a are located close to an AQMA designated due to air pollution along Vernon Street and the increase in residents may have a negative effect on air quality and increased effects of traffic upon the environment (ET1 and ET4). Each of these sites is located close to key facilities such as schools, public transport, shops and parks and therefore benefits SA Objective ET5. IP188 and IP039a located in flood zones 2 and 3 and are prone to flooding from the river Orwell. IP080 is adjacent to flood zone 2 and 3. IP188 and IP039a are adjacent to listed buildings and IP188 falls entirely within a Conservation Area.</p> <p>The provision of housing close to existing employment areas and a range of community facilities could help to encourage efficient patterns of movement and would help to support the vitality and viability of town centres supporting SA Objectives ER5 and ER6.</p>
<p>IP083: Banks of the river upriver from Princess Street</p> <p>IP015: West End Road Surface Car Park</p>	IP One South West	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. Due to the number of proposed homes, it is not considered that effects against air quality would be significant for these sites. The sites scored positively against SA Objective ET2 (soil resources) as they would be developed on brownfield land. Any remediation, if required, would serve to improve the soil resource. The sites scored positively against ET5 (access), and HW2 (quality of life) are located close to key facilities and would improve access to services whilst promoting healthy lifestyles and contributing to improving community participation. IP015 scored negatively against ET6 (climate change) as it is located within flood zone 2 and 3 and is at risk of flooding from the river Orwell. It also scored negatively against ET9 (heritage assets) as it is located close to a listed building and may have potential effects against its setting.
<p>IP004: Bus depot Sir Alf Ramsey Way</p> <p>IP096: Car park Hanford Road East</p>	IP One South West	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. IP004 and IP096 scored positively against SA Objective ET1 (air quality) as the area is served by public transport which may reduce the need for private car use. There are also a number of employment sites in close proximity to the site allocations which may encourage the implementation of car share schemes as well as encouraging more sustainable travel modes which would also help to support SA

Site Allocation	Location	Significant Findings
IP006: Coop Warehouse, Pauls Road		Objective ET4 (traffic). As each of the sites is located in central Ipswich, close to shopping areas, access to key services will be improved supporting SA Objective ET5. IP004 is located within flood zones 2 and 3 and is at risk of flooding from the river Orwell. IP096 is also located in an area prone to flooding. IP006 scored negatively against HW1 (health) as a result of the location close to railway lines which may have potential noise disturbance. Each of the sites scored positively against SA Objectives HW2 (quality of life) and ER5 (vital town centres) as the location of each site (close to shops, facilities and services) will help to encourage community participation whilst supporting town centre vitality and viability.
IP032: King George V Field, Old Norwich Road  IP005: Former Tooks Bakery, Old Norwich Road,	Ipswich North West	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The sites scored negatively against SA Objectives ET1 (air quality), ET3 (waste) and ET7 (water quality). The developments seek to provide housing and would cumulatively result in increased cars and people which would make a negative contribution to local air quality although this would be minor. Waste production and water use would increase as a result of more people.  Positive scores were recorded against HW1 (health), HW2 (quality of life), and ER1 (poverty) as the sites will help to support health due to being located close to existing playing fields which will also help to encourage community participation and reduce social exclusion. The provision of homes many help to minimise opportunities for antisocial behaviour through safety by design measures.
IP221 Flying Horse PH  IP029: Land opposite 674-734 Bramford Rd  IP165: Eastway Business Park, Europa Way  IP175: 47-51 Waveney Road  IP033: Land at Bramford Rd (Stock Sites)	Ipswich North West	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The sites scored negatively against ET1 (apart from IP175) as the sites seek to provide homes which would cumulatively increase the number of people and vehicles within the local area which could negatively affect air quality. IP175 scored positively against ET2 (soil resources) as it would be developed on a brownfield site which could potentially be contaminated. Remediation to the site would allow for the improvement of the soil resource.  The provision of homes with IP165, which is close to the A14 could increase traffic on A14 (and cumulatively with sites in the local area) however it is anticipated that the overall effect would be minor. The sites scored positively against ET5 (access) as each would contribute to improving access to key services. IP029, IP165 and IP033 currently contain vegetation or TPOs which could be affected by development. The sites could each contribute to enhancing local distinctiveness through careful design.
IP131: 488-496 Woodbridge Road / Milton Street  IP116 St Clements Hospital Grounds	Ipswich North East	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. Air quality and climate change effects are recorded as neutral due to negligible impacts as a result of development. Positive scores are recorded against ET2 (soil resources) and ET5 (access) due to the remediation of contaminated land. The site is located close to a District Centre and two Local Centres therefore access to these sites would be improved though on a minor scale. High quality housing provision would help to support quality of life and reduce social exclusion (HW1, HW2 and ER1). The use of safety by design measures

Site Allocation	Location	Significant Findings
		would help to reduce opportunities for crime and anti-social behaviour. Development at IP116 would see a localised increase in population and private car use which would have a minor negative effect on air quality and the environment (ET1 and ET4). The site is located close to a Local Centre and with the localised population increase, this centre would sustain viability and vitality and efficient patterns of movement would be encouraged (ER5 and ER6). Due to the housing capacity, an increase in waste is considered likely and therefore scores negatively against SA Objective ET3 'To reduce waste'.
IP009: Victoria Nurseries, Westfield Road  IP256: Artificial Hockey pitch, Ipswich Sports club subject to the requirements of policy DM28 being met	Ipswich Central	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The sites seek to provide small scale housing development which would have a minor negative effect on local air quality and traffic. IP256 is adjacent to the Northern Fringe Allocation so that there may be cumulative effects on traffic. There is one bus route in close proximity to the sites which could help to reduce negative effects on traffic. These sites would be developed on brownfield sites and remediation of land would help to improve the soil resources. There may be a drainage constraint at IP256 due to its previous use as a hockey pitch. Each of these proposed developments are located close to a large area of open space which could make minor contributions towards improving health in the long term through encouraging people to go outdoors and promoting healthier lifestyles. However, there will also be a loss of an outdoor recreation facility, which would have a negative impact on HW1. Therefore, it is considered that the effects will be both positive and negative.. Both sites could contribute towards improving and enhancing development quality through careful design that integrates with its surroundings (ET10). IP256 could help to support local businesses as it is located close to a local centre and some minor benefits may be offered in encouraging investment.
IP105: Depot, Beaconsfield Road	Ipswich Central	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The site scored negatively against SA Objectives ET1 (air quality), ET3 (waste) and ET4 (traffic) as provision of homes, cumulatively with proposed development in the immediate area, would lead to an increase in vehicles which could have effects on air quality and the environment though effects would be minor. The site would be developed on previously developed land and the remediation of contaminated land would help to improve the soil resources (ET2). The provision of homes close to Local Centre 35 would help to improve access (ER5) and would support the viability and vibrancy of these centres (ER6). The provision of decent housing close to areas of open space would also help to reduce social inclusion, promote healthier lifestyles and encourage community participation (HW1, HW2 and ER1).

#### Policy DM40 Land with planning permission or awaiting a Section 106

This policy relates to sites with planning permission and mixed scores are recorded against the SA Objectives. Those relating to housing would contribute to housing and health objectives. Employment allocations would contribute to economic and employment objectives.

Site Allocation	Location	Significant Findings
IP0150a: Land at Ravenswood	South East	Mixed scores are recorded against the SA Objectives. The increase in people and cars in the long term would have negative effects on air quality and the environment due to vehicular emissions (though effects would be minor) and would increase waste

Site Allocation	Location	Significant Findings
		production (ET1, ET3, ET4 and ET6). The site would be developed on previously developed land and the remediation of contaminated land would help to improve the soil resources (ET2). The site would support SA Objective HW1, HW2 and ER1 as they would improve the quality of housing stock and would contribute towards increasing the quality of life for residents. However, in the short term, crime levels may increase as a result of influx of new residents..
IP059b: Arclion House, Hadleigh Road	South West	Mixed scores are recorded against the SA Objectives. The increase in people and cars in the long term would have negative effects on air quality and the environment due to vehicular emissions (though effects would be minor) and would increase waste production (ET1, ET3, ET4 and ET6). The site would be developed on previously developed land and the remediation of contaminated land would help to improve the soil resources (ET2). The sites would support SA Objective HW1, HW2 and ER1 as they would improve the quality of housing stock and would contribute towards increasing the quality of life for residents.
IP176: 7-9 Woodbridge Road IP214: 300 Old Foundry Road IP132: Former St Peter's Warehouse Site 4 Bridge Street	IP One Area Central	<p>The sites directly support SA Objective ER3, <i>'To help meet the housing requirements for the whole community'</i>. The site allocations scored positively against SA Objective ET4, <i>'To reduce the effects of traffic upon the environment'</i> as they are located in close proximity to the primary and secondary shopping areas and this may reduce the need to travel by private car.</p> <p>The sites are not located in flood risk areas and there may be benefits for water if opportunities are sought to remediate some historical areas of contamination.</p> <p>The sites scored positively against SA Objectives HW1, HW2, ER3 and ER6 as the provision of quality housing close to Christchurch Park and close to land allocated for community and leisure use could help to encourage healthier lifestyles, efficient patterns of movement and community participation.</p> <p>The site allocation IP132, cumulatively with other developments in the immediate local area, will lead to an increase in people due to housing development which will increase cars and ultimately vehicular emissions which will have a negative effect on air quality (ET1). Whilst there are two bus stations and Ipswich Railway Station near the sites, the area is not currently served by local public transport. In addition, the main shopping area is located north of the sites and existing employment areas are further south and west which may result in increased private car use and congestion issues therefore negative effects were recorded against ET4 (traffic). As the site is associated with potential negative effects on the local highway network (Star Lane) there may be potential access constraints and this would not benefit ET5. The site is located on the waterfront and scored negative against SA Objective ET10 <i>'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes'</i> as there could potentially be negative effects to the local character of Neptune Marina and the quays in the area. The site is located in flood zone 2 and 3 and is at risk of flooding from the river Orwell. The provision of quality housing could have positive indirect effects on health and improving quality of life and could also help to reduce social exclusion through improving access in some cases to community facilities.</p>
IP:253: Electric House, Lloyds Avenue	IP One Area Central	These sites are located in urban Ipswich and would be developed on brownfield land; remediation of this land would benefit the soil resources and support SA Objective ET2. Due to the location of the sites in the central urban area, access to facilities and shopping areas would be improved which would benefit SA Objective ET5. The sites scored positively against HW1 (health) as

Site Allocation	Location	Significant Findings
IP245:12-12a Arcade Street IP215: 7-15 Queen Street		they could encourage community participation through the provision of homes close to community facilities.
IP074: Church and land at Upper Orwell Street IP084: County Hall, St. Helen's Street	IP One Area Central	<p>These sites scored negatively against SA Objective ET1 (air quality) as they are located close to an AQMA and additional housing may result in increase in car use. In addition, there are potential negative effects associated with dust air and pollution during construction. IP084 scored negatively against ET3 (waste) as it is likely to result in increased waste generation due to housing provision. IP074 has TPOs which may be affected by development. The sites scored positively and negatively against ET9 (heritage assets) and ET10 (local distinctiveness) as IP084 is located in a Conservation Area and both sites are in an Area of Archaeological Importance.</p> <p>Positive scores are recorded against ET4 (traffic), ET5 (access), and ER1 (poverty) as the central location of the sites may encourage sustainable travel due to close proximity to key services and facilities which may also help to reduce social exclusion. The sites would support the viability and vitality of centres due to the central location and they would directly support SA Objective ER3 by providing housing to meet community requirements.</p>
IP052: Land between Lower Orwell Street IP011a: Smart Street / Foundation Street	IP One Area Central	<p>Part of IP011a is located within an AQMA. IP052 may generate traffic on Star Lane and key roads which may negatively affect air quality (ET1). Each of the sites would be developed on previously developed land: remediation would benefit the soil resources (ET2).</p> <p>IP011b and IP052 both scored negatively against ET3 (waste) as they would increase waste generated and cumulatively, negative effects against this SA Objective are expected with other developments in the IP One Area. The sites scored positively against ET4, ET5, ER1, HW1 and HW2 as the central location of the sites may reduce car reliance and could improve health, access to key services and facilities whilst supporting community participation and reducing social exclusion.</p> <p>IP011a is located adjacent to a Conservation Area. There are also listed buildings that could be affected by development at these sites and each of the sites is located within an Area of Archaeological Importance.</p>
IP205: Burton's College Street IP206: Cranfields, College Street IP211: Regatta Quay, Key Street	IP One Area Central	<p>The site allocations will cumulatively lead to an increase in people due to housing development which will increase waste, cars and ultimately vehicular emissions which will have a negative effect on air quality (ET1). Whilst there are two bus stations and Ipswich Railway Station near the sites, the area is not currently served by local public transport in addition, the main shopping area is located north of the sites and existing employment areas are further south and west which may result in increased private car use and congestion issues therefore negative effects were recorded against ET4. It is noted that the Core Strategy is committed to extending the free shuttle bus, which may reduce impacts. ET206 and ET211 are located adjacent to the River Orwell County Wildlife Site and there are potential negative effects due to noise, air pollution and disturbance to species along the river all of which would detract from SA Objective ET8 (biodiversity).</p> <p>The sites are located on the waterfront and each scored negatively against SA Objective ET10 'To <i>conserve and enhance the quality and local distinctiveness of landscapes and townscapes</i>' as there could potentially be negative effects to the local</p>

Site Allocation	Location	Significant Findings
		<p>character of Neptune Marina and the quays in the area. The sites are located in flood zone 2 and 3 with a risk of flooding from the river Orwell. The provision of housing could have positive indirect effects on health and improving quality of life and could also help to reduce social exclusion through improving access in some cases to community facilities.</p>
<p>IP178: Island House, Duke Street</p> <p>IP226: Helena Road</p> <p>IP042: Land between Cliff Quay and Landseer Road</p> <p>IP209: 158 Foxhall Road</p>	<p>IP One Area South East</p>	<p>IP178 is located close to an AQMA and as a result of an increase in residents cumulatively in the immediate area; traffic may be generated in the vicinity of Duke Street, A1156 and Fore Street. Each of the sites would benefit ET2 as each site is on previously developed land and through remediation the soil resources could be improved. The relatively central location of sites could help to encourage more sustainable modes of transport in some cases and could help to improve access to key services (ET4). IP178, IP226 and western parts of IP042 fall within flood zone 2 and 3.</p> <p>IP042 is adjacent to a Holywells Park CWS and IP225 is in close proximity to the river Orwell to the west. One TPO is located within the northern parts of IP042 and an application for Tree Works may be required as each of these features has the potential to experience negative effects. There are also listed buildings close to IP042.</p> <p>Development at IP209 would support SA Objective ET6, 'To limit and adapt to climate change' by replacing existing buildings and land with modern techniques including insulation and heating methods which would replace existing inefficient practices with modern standards.</p>
<p>IP133: South of Felaw Street</p> <p>IP200: Griffin Wharf, Bath Street</p>	<p>IP One Area South West</p>	<p>Both sites scored positively and negatively against SA Objective ET1 (air quality). The sites are located a significant distance from any AQMAs however it is likely that residents from these developments will contribute to increased traffic generated northbound in order to access shopping areas. The sites scored negatively against SA Objective ET5 as potential access constraints exist and they are associated with negative effects on the local highway network at junction A137. The sites are located in flood zones 2 and 3 and are prone to flooding from the river Orwell. IP200 is located adjacent to a CWS and the indicative capacity at this site suggests potential negative effects on the designated site associated with noise, pollution and disturbance to species. IP133 is located adjacent to a Conservation Area and development has the potential to affect the settings of designated sites.</p> <p>The provision of housing close to existing employment areas and a range of community facilities could help to encourage efficient patterns of movement and would help to support the vitality and viability of town centres supporting SA Objectives ER5 and ER6. Development at these sites would help to support town centre viability as they would in the long term provide an increase in potential users of facilities and services.</p>
<p>IP169: 23-25 Burrell Road</p>	<p>IP One Area South West</p>	<p>The site is located close to an AQMA designated due to pollution along Vernon Street and Bridge Street. An increase in residents may contribute to additional traffic and vehicular emissions which could have negative effects on the environment. It is considered likely that residents from the new housing dwellings could generate additional traffic eastbound along Burrell road to access shopping areas and community services in the town centre area via Bridge Street. However, the number of dwellings does not suggest a significant change from the baseline.</p> <p>This site is located close to parks, schools, facilities and services all of which would improve access to schools, key services and</p>



Site Allocation	Location	Significant Findings
		<p>would help to encourage community engagement and improve health, supporting several SA Objectives. There may be issues relating to the deterioration of the waterfront townscape character. Allocating housing at this site would help to meet local housing needs whilst providing decent homes close to facilities which would help to improve quality of life health and would contribute towards reducing social exclusion supporting SA Objectives HW1, HW2 and ER1.</p> <p>This site is located on previously developed and potentially contaminated land. Remediation of this land would help to improve the soil resources and would benefit SA Objective ET2.</p>
<p>IP088: 79 Cauldwell Hall Road</p> <p>IP109: R/O Jupiter Road and Reading Room</p>	<p>Ipswich North East</p>	<p>IP109 seeks to provide 13 homes and IP088 seeks to provide 16 homes and for this reason elements, such as effects on air quality and climate change have been recorded as neutral due to negligible impacts as a result of development. Positive scores were recorded against ET2 as development would allow for the remediation of contaminated land. The sites are located close to a District Centre and two Local Centres therefore access to these sites would be improved on a minor scale. High quality housing provision would help to support quality of life and reduce social exclusion (HW1, HW2 and ER1). The use of safety by design measures would help to reduce opportunities for crime and anti-social behaviour.</p>
<p>IP090: Europa Way</p>	<p>Ipswich North West</p>	<p>The site scored negatively against ET1 (air quality) as it seeks to provide homes which would cumulatively increase the number of people and vehicles within the local area and negatively affect air quality though these effects would be minor. There is a proposed District Centre within this site which would directly improve access to key services (ET5). The site contains vegetation and TPOs which could be affected by development. The site could contribute to enhancing local distinctiveness as well as reducing crime opportunities through sensitive design and safety by design measures.</p>
<p>IP016 Funeral Directors</p> <p>IP223 Hayhill Road/Woodbridge Road</p> <p>IP129 BT Depot, Woodbridge Road</p>	<p>Ipswich Central</p>	<p>The sites had mixed scores against the SA Objectives. Positive scores are recorded against SA Objective ER5, ER6 and ER7. Development particularly at IP223 which seeks to provide over 100 new homes would in the long term help encourage investment by providing a localised increase in population to support local businesses. The site allocations would also directly support the provision of housing to meet local needs (ER3). Negative effects were recorded against ET1 (air quality), ET3 (waste), ET4 (traffic) and ET6 (climate change) as the sites would cumulatively result in an increase in the local population and private cars which would have a negative effect on air quality and climate change though these effects would be minor. Waste production would also increase though waste reduction initiatives where possible would help to reduce waste.</p>
<p>IP246: 158-160 London Road</p> <p>IP135: 112-116 Bramford Road</p> <p>IP130: South of South Street</p>	<p>Ipswich Central</p>	<p>The site allocations scored negatively against SA Objectives ET1 (air quality), ET3 (waste) and ET4 (traffic) as provision of homes would cumulatively lead to an increase in vehicles which could have minor effects on air quality. IP135 is located in an area with potentially difficult access which may have a minor localised effect on traffic. The sites would be developed on PDL and the remediation of contaminated land at IP135 would help to improve the soil resources (ET2). The provision of homes close to Local Centre 35 and District Centre 7 would help to improve access and would support the viability and vibrancy of these centres (ER5). The provision of housing close to areas of open space would also help to reduce social inclusion, promote healthier lifestyles and encourage community participation (HW1, HW2 and ER1). The use of safety by design measures would help to reduce opportunities for crime and anti-social behaviour.</p>

### Policy DM41 Land allocated for Gypsy and Traveller sites

Sites currently used by Gypsies are identified on the policies map. Land allocated for a permanent Gypsy and Traveller site to meet needs is Site IP261 Land at River Hill. Providing Gypsy sites would contribute to the housing objective. The assessment of this site is set out in Appendix F and summarised below.

Site Allocation	Location	Significant Findings
IP261: Land at river Hill	North West	The site is currently greenfield land and scored negatively against SA Objective ET2 as development would adversely impact soil quality. The site scored positively for HW1 (health), HW2 (quality of life) ER1 (poverty) and ER3 (housing) as the provision of 6 pitches at this site would improve health, address housing needs, encourage community participation and reduce social exclusion. However, there will be negative impacts on landscape character (ET10) from mobile homes, caravans, structures etc.

### Policy DM42 Land allocated for employment use

Sites are allocated for employment development will contribute to economic and employment objectives. The assessment is presented in Appendix F and the summary table is set out below.

Site Allocation	Location	Significant Findings
IP147: Land between railway junction and Hadleigh Road	South West	The site allocation would result in negative effects against six of the SA Objectives. It would result in a daily increase of workers and residents in the long term causing increased emissions and effects to the environment. Development would directly support SA Objective ER2, <i>'To offer everybody the opportunity for rewarding and satisfying employment'</i> , by providing employment during construction and during operation. IP147 would help to attract investment, create jobs and could help to encourage efficient patterns of movement providing increased presence within local centres. It would address job provision, which would help to increase quality of life supporting SA Objectives HW1, HW2, ER2, ER4, ER5, ER6 and ER7.
IP146: Ransomes Europark East	South East	IP146 would create employment areas at three locations which would result in increase of traffic and negative effect on air quality (ET1) however public transport would mitigate some of this increase. There are bus routes located nearby the Euro Retail Park with connections close to the Makro store. Provision of employment land would attract investment, in the long term would create jobs and increase wages and standards of living for the local population which would serve to improve quality of life, and reduce social exclusion. IP146 is presently on an area of unused fields. Development on this area would result in disturbance to virgin soils and could cause detriment to the soil resource. . As this site would be developed on open space, it would increase waste and would have the potential to affect protected species which would detract from SA Objective ET3. The removal of existing fields and grassland and replacement hard standing would increase runoff and decrease ground absorption.
IP067: Former British Energy Site	South East	IP067, IP058 and IP099 each had mixed scores against the SA Objectives. The area around IP067 and IP099 is presently affected by odour from the nearby sewage works which has been identified as an existing barrier to development. Each of these

Site Allocation	Location	Significant Findings
<p>IP058: Former Volvo Site, Raeburn Road South</p> <p>IP099: Part of former Volvo Site, Raeburn Road South</p>		<p>proposals scored positively against SA Objectives ET2 (soil resources). IP058 is presently a County Wildlife Site and development here would seek to promote the wildlife associated with the reserve. The removal of existing structures at the sites (IP067 former British energy site, IP099 and IP058 both former Volvo sites) would decrease the potential run off by increasing ground absorption. The employment sites would help to attract inward investment and would provide the opportunity for rewarding employment, sustainable economic growth and would help to increase living standards which could support health and quality of life and the vitality and viability of centres (, HW1, HW2, ER2, ER4, ER5, ER6 and ER7).</p>
<p>IP152: Airport Farm Kennels, north of the A14</p>	South East	<p>The site is likely to increase traffic and negatively affect air quality though this could be mitigated by increasing public transport provision. Disturbance to soil is considered likely however remediation would help to improve the soil resources (ET2). This site allocation would directly support economic SA Objectives by offering employment opportunities, support efficient patterns of movement and inward investment (ER2, ER6 and ER7). The site would also help to attract people into the local area which would help to support local centres and businesses to achieve sustainable levels of growth.</p>
<p>IP035: Key Street / Star Lane / Burtons (St. Peter Port)</p> <p>IP037: Island site</p>	IP One Area Central	<p>The area along Star Lane, College Street and Bridge Street is designated as an AQMA and these sites have the potential to contribute to increasing vehicles particularly from users of the office or hotel buildings which may negatively affect air quality (ET1 and ET4). The sites are located in flood zone 2 and 3 and at risk of flooding from the river Orwell. However, as mitigation, the Core Strategy has Policy DM4 which addresses flood risk. The sites would support SA Objective ER2 <i>'To offer everybody the opportunity for rewarding and satisfying employment'</i> as it is sought to be used for employment which in the long term would provide employment opportunities. The site would also support the viability and vitality of local town centres as it would help to meet demands of growing numbers of residents (ER5). The sites would be developed on previously developed land and remediation measures would help to improve the soil resources (ET2). Waste production is likely to increase on the whole due to the scale of developments.</p>
<p>IP094: Land to rear of Grafton House</p>	IP One Area South West	<p>This site is located on previously developed land and possible contamination has been identified. Remediation of this land would help to improve the soil resources. The site is served by public transport. In the long term the development is likely to result in increase of waste production ET3 <i>'To reduce waste'</i>. The site would directly support SA Objective ER2 as it would provide employment use land. It would also help to achieve levels of sustainable prosperity and economic growth (ER4). The provision of employment in the long term may help to reduce social exclusion and poverty and could help to achieve SA Objectives HW1 and HW2 cumulatively with development including housing and open space in close proximity to this site.</p>
<p>IP004: Bus depot Sir Alf Ramsey Way</p> <p>IP051: Old Cattle Market Portman Road</p>	IP One Area South West	<p>The sites are located in areas served by public transport which may reduce the need for private car use. There are also a number of employment sites in close proximity which may encourage the implementation of car share schemes as well as more sustainable travel modes supporting directly SA Objective ET4. As each of the sites is located in central Ipswich, close to shopping areas access to key services will be improved supporting SA Objective ET5. IP004 and IP096 are located within flood zones 2 and 3 and are at risk of flooding from the river Orwell. The sites will help to support SA Objective ER2 <i>'To offer everybody the opportunity for rewarding and satisfying employment'</i>, by providing employment opportunities during construction and operational</p>

Site Allocation	Location	Significant Findings
		phases. The sites scored positively against SA Objectives HW1, HW2 and ER5 as the location of each of the sites close to shops, facilities and services will help to encourage community participation whilst supporting town centre vitality and viability.
IP140b: Land north of Whitton Lane	Ipswich North West	The site scored negatively against ET2 as it would result in the direct loss of greenfield land. The employment area would directly support the provision of employment opportunities (ER2) and this could also help to attract inward investment and support economic growth (ET5 and ER7). The site scored negatively against SA Objective ET7 (water quality) and ET8 (biodiversity) as it would result in loss of greenfield land which could increase surface runoff. The site could contain hedgerows and areas of significance for wild life which would also be lost to development.
IP011b, IP015, IP043, IP052 and IP054		These site allocations have already been assessed previously in the tables above and the assessments are not repeated in this table.

#### DM43 Land allocated and protected as open space

Land is allocated for open space and providing open spaces would have health benefits. It would also contribute to the quality of life of the residents and air quality. Some indirect benefits include opportunities for social inclusion and community participation. There are also opportunities for enhancement, which should benefit biodiversity. The assessments of sites are set out in Appendix F and below.

Site Allocation	Location	Significant Findings
IP263: West of Bridge Street	IP One Area Central	This site may contribute partially to achieving SA Objective ET1 ' <i>To improve air quality</i> ' with the provision of 0.17ha of open space at the Waterfront. The site would be developed on brownfield land and remediation would improve the soil resources. SA Objective ET8 (biodiversity) would receive some benefits as the site is allocated for open space which may also help to improve health and quality of life as well as social inclusion and community participation (HW1, HW2, ER1 and ER1). Habitat creation and enhancement could also benefit landscape and townscape at this site (ET10).
IP037: Island Site	IP One Area Central	The site scored negatively against SA Objective CD1 (crime). It is ranked as an area less deprived when compared to those adjacent to it and in the short term may lead to an increase in crime levels. Positive and negative effects were recorded against SA Objective ET5 as constraints are identified with the potential increase in residents relating to the need to provide vehicular/pedestrian/cycle access via a new bridge. The site is located in flood zone 2 and 3 and providing open space would have a positive impact on flood risk as the area has potential to absorb flood waters. However, it should be noted that the open space would be within developments, which has the potential to increase flood risk. The site is surrounded by a designated county wildlife site and is close to an SPA south of the river Orwell therefore potential negative effects are associated with of disturbance to protected birds. Provision of open space would benefit human health and would encourage community participation benefitting SA Objectives HW1 and HW2.
IP142: Land at Duke Street	IP One Area	The site is located close to an AQMA and the provision of open space would help improve local air quality. The site would benefit ET2 as it is on previously developed land which is likely to be contaminated and through remediation the soil resources could be

Site Allocation	Location	Significant Findings
	South East	improved. The relatively central location of the site could help to encourage more sustainable modes of transport in some cases and could help to improve access to key services (ET4). This site could directly benefit health and quality of life (HW1 and HW2) with the provision of open space and it is also located close to Holywells and Alexandra Park which could further encourage healthier lifestyles. Potential positive effects are associated with improving access to education as the University Campus Suffolk is located close to the site (CL1).
IP083: Banks of the river upriver from Princes Street	IP One Area South West	The provision of open space could help to encourage people to walk and cycle more which may have a positive effect on air quality as well as human health, wellbeing and quality of life, supporting SA Objectives ET1, ET4, ET5, ET6, HW1, HW2 and ER6. Retaining open space at this site could also benefit ET8 by potentially supporting wildlife and it would help to reduce runoff in the floodplain supporting SA Objective ET7.
IP029 Land opposite 674-734 Bramford Way  IP033 Land at Bramford Road (Stocks Site)	Ipswich South West	The provision of open space with IP029 and IP033 will help improve local air quality. The sites scored positively against ET5 (access) as they each would contribute to improving access to key services and IP029 and IP033 would provide open space which would directly serve housing development at these sites. IP029, IP033 currently contain vegetation or TPOs which could be affected by development. The sites could contribute to enhancing local distinctiveness through careful design.
IP032, IP048, IP116 and IP061	North West Central North East South West	These sites have been assessed previously. Open spaces are likely to have potential positive impacts on health, air quality and biodiversity.

#### DM44: Land allocated for leisure uses or community facilities

Land is allocated for leisure and community uses, which should contribute to health, social and economic objectives. These sites would provide opportunities for social inclusion and community participation, which could improve the quality of life of residents. Assessments of sites are set out in Appendix F and below.

Site Allocation	Location	Significant Findings
IP149: Pond Hall Farm  IP150b: Land south of Ravenswood	South East	Development of a sports facility at IP150b would lead to an increase in movement which may have an effect on air quality and the environment (ET1). The extension to the country park proposed at IP149 could offer benefits to SA Objective ET8, ' <i>To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs</i> ', as it could help to enhance habitats within the area. The site is bordered by the internationally designated SPA/Ramsar and nationally designated SSSI. Opportunities to develop IP149 could also have a positive effect on these sites.

Site Allocation	Location	Significant Findings
		<p>IP149 and IP150b would both benefit HW1 (health), HW2 (quality of life) and ER1 (poverty) as the development of sports facilities and extending the existing country park would provide means for promoting healthier lifestyles and encouraging community participation whilst helping to reduce social exclusion. Development at these sites would help to attract inward investment which could benefit surrounding areas by sustaining local centres and improving access to facilities (ET5, ER5 and ER7).</p> <p>IP149 would also particularly benefit SA Objective ET10, <i>'To conserve and enhance quality ad local distinctiveness of landscapes and townscapes'</i>.</p>
IP260: The Former Odeon Cinema	IP One Area Central	The site is allocated for leisure uses/community facility and an increase in traffic would be expected though this would be determined by car parking provision. The Odeon is an existing vacant building which may be reused. As the site is allocated for leisure use there is potential for waste production to increase. The site scored positively and negatively against SA Objective ET9, <i>'To conserve and enhance the historic environment, heritage assets and their settings'</i> as it is located at close proximity to Listed Buildings and development could potentially affect these heritage assets.
IP258: Land at University Campus Suffolk as part of the Education Quarter	IP One Area Central	The site is located close to an AQMA and the proposed use of land as a new primary school would result in a daily increase in cars at peak times which may have an effect on air quality (ET1). There is a TPO nearby the site which may require an application for Tree Works. The site would benefit SA Objective HW1 (health) and HW2 (quality of life) as it would overall contribute to improving quality of life. The site would also directly support SA Objective CL1 <i>'To maintain and improve access to education and skills for young people and adults'</i> as it would provide a new primary school in a central accessible location.
IP005: Former Tooks Bakery, Old Norwich Rd	Ipswich South West	<p>The site seeks to provide a health centre alongside its residential allocation. Negative scores were recorded against SA Objectives ET1 (air quality), ET3 (waste) and ET7 (water quality). As an increase in cars cumulatively with other development in the immediate area could result in increased cars and people which would make a negative contribution to local air quality. Waste production and water use would increase with new development.</p> <p>The site scored positively against HW1, HW2, and ER1 as it will be providing a health centre which will help to support the health of local residents. It is also located close to existing playing fields which will also help to encourage community participation and reduce social exclusion.</p>
IP010a Co-op Depot, Felixtowe Road	South East	This site has been assessed previously in the above tables.

#### Policy DM45 Safeguarding land on development sites for transport infrastructure

This policy safeguards land on development sites for transport infrastructure. These sites have potential positive and negative impacts on air quality, traffic and climate change. There are also potential impacts on biodiversity as park and ride facilities are proposed on greenfield land. The provision for cycle and pedestrian links would contribute to reducing impacts on traffic and air quality as residents are provided with sustainable travel choices.

Site Allocation	Location	Significant Findings
IP140a: Land north of Whitton Lane, extension to Bury Road park and ride	South East	The site is allocated as an extension to the park and ride facility which would accommodate parking for IP140b employment area. It would contribute to improving air quality in central Ipswich by reducing congestion though may result in a minor increase in traffic and associated air quality effects at the Borough edge. It may also have transboundary implications therefore positive and negative effects were recorded against ET1 (air quality), ET4 (traffic) and ET6 (climate change). The site scored negatively against ET2 (soil resources) as it would result in the direct loss of greenfield land. The park and ride facility would improve access to key services and employment areas and it would support and encourage economic growth (ET5 and ER4). The site scored negatively against SA Objective ET7 (water quality) and ET8 (biodiversity) as it would result in the replacement of greenfield land which could increase surface runoff. Any development should aim to retain any wildlife features of interest.
IP059a and IP037	South West IP-One area	These have been assessed previously in the above tables.

#### Policy DM46 Port of Ipswich

This policy relates to the area around the Port of Portsmouth. Safeguarding this land would have potential for economic benefits but its development would have potential impact on biodiversity resources. The assessment of the site is set out in Appendix F and below.

Site Allocation	Location	Significant Findings
IP262: Ash Tip, Cliff Quay	South East	The area around the land allocated for port use is presently affected by odour from the nearby sewage works which was identified as an existing barrier to development. Development at this site would create further traffic and machinery through port use designation. The site is presently an area of unused land and development would cause disturbance to land due to the historic use of the site as an ash tip negatively affecting the soil resources (ET2). The site is located within a floodplain and therefore flood risk is an issue. The site borders an SPA/Ramsar site to the east and is close to an SSSI and sensitive development would therefore be required. Proposed development would help to provide employment and economic growth in the long term which would contribute to prosperity and attracting investment all of which would be beneficial to SA Objectives ER2, ER4, ER6 and ER7. The site is located close to District Centre 26 and may result in increase of people in the long term to support the vitality and viability of this centre, benefiting SA Objective ER5.

#### Policy DM53 Education Quarter

This policy relates to The Education Quarter as defined on the IP-One inset policies map. It comprises the Suffolk New College campus and the University Campus Suffolk campus (and proposed primary school). Development for education and ancillary uses such as student accommodation will have direct positive effects educational attainment. Safeguarding land for public car parking would have potential for economic and access benefits but its development would have potential impact on air quality. The assessment of the site is set out in Appendix F and below.

Site Allocation	Location	Significant Findings
IP049: No 8 Shed Orwell Quay	IP-One Area	Part of IP049 is allocated for car parking which will attract cars and impact on air quality. Development at this site would create further traffic and negative scores are recorded against SA objectives ET1, ET4 and ET6. IP049 will also contribute to the achievement of SA objective CL1 To maintain and improve access to education and skills for both young people and adults' through the expansion of University Campus Suffolk. Benefits associated with improved education and provision of public car parking will contribute to the achievement of some economic objectives ER1, ER5, ER6, ER7 and it will result in overall improved quality of life (HW2).

### Policy DM57 Town Centre Car Parking

Sites are allocated for medium sized multi storey car parks providing additional short stay shopper and visitor parking at IP055 Crown Street (on the existing Crown car park site) and IP048 Mint Quarter. Safeguarding land for car parking would have potential for economic and access benefits but would have potential negative impacts on air quality. IP048 has already been assessed within policy DM39. The assessment of IP055 is set out in Appendix F and below.

Site Allocation	Location	Significant Findings
IP055: Crown Street	IP-One Area	IP055 is allocated for car parking which will attract cars with some negative scores recorded against ET1, ET4 and ET6. Benefits associated with improved access (ET5) and provision of public car parking will contribute to the achievement of some economic objectives ER5, ER6, and ER7.



## Recommendations for mitigation measures

### 4.4.2 Recommendations to mitigate the significant negative effects include:

- Provision of more frequent public transport to meet increased demand where necessary to ease traffic and address congestion/air quality issues. Where possible public transport links should be provided within 200m of development.
- The use of sustainable modes of transport should also be encouraged through improvements to the pedestrian and cycling infrastructure.
- Provision of green space will improve increase permeability and connectivity.
- Sensitive development on account of the presence of TPOs.
- Contaminated land remediation where appropriate will help to improve the soil resource.
- Recycling schemes should be promoted to reduce impact of additional waste.
- Surveys and mitigation for bird species should be undertaken at sites containing vegetation prior to construction works. The inclusion of soft landscaping would offer minor benefits to biodiversity.
- Provision of wildlife and recreational green corridor functions associated with the 'green rim' (Core Strategy Policy CS16, Site Allocations and Policies DPD draft policies DM33 and DM34) should be encouraged.
- Soft landscaping will minimise impacts to loss of undeveloped land.
- Although the implementation of the tidal barrier and raised defences will raise the level of protection, there is still a residual risk of flooding by either failure of new defences or overtopping in extreme events. The sequential test should direct development to areas at lower risk of flooding. Development should be encouraged to use SuDS to manage runoff, further reduce flood risk and help protect groundwater and surface water quality.
- Appropriate design of buildings should be required (through the use of traditional or sympathetic building materials and techniques) to complement and enhance existing designated buildings and local distinctiveness.
- Safety by design principles should be considered to help deter anti-social behaviour.
- Mitigation measures may be required if any archaeological remains are discovered to avoid damage to the heritage assets. Where appropriate mitigation measures can include completion of a licensed excavation and recording of remains before development commences.
- New developments for employment use should meet BREEAM standards.
- New residential developments should meet Code for Sustainable Homes standards.

## 4.5 Appraisal of IP-One Policies

4.5.1 The IP-One Policies simply delineate areas, whereas the policy for development within these areas is set out in the Core Strategy DM20 Central Shopping Area, DM21 District and Local Centres and DM22 Town Centre Uses Outside the Central Shopping Area. The IP- One policies include the following:

- **DM47 Central Shopping Area**
- **DM48 Primary, Secondary and Specialty Shopping Areas and Frontages**
- **DM49 Retail Site Allocations**
- **DM50 District and Local Centres within IP-One**
- **DM51 Town Centre Boundary**
- **DM52 Ipswich Waterfront**
- **DM53 Education Quarter**
- **DM54 Tourism and Culture**
- **DM55 Pedestrian and cycle routes in IP-One**
- **DM56 East-west traffic**
- **DM57 Town Centre Parking**

The detailed matrices are presented in Appendix G. The findings of the assessment are set out below.

### **DM47 Central Shopping Area**

4.5.2 DM47 seeks to focus retail activity within a concentrated area and recognises that the Central Shopping Area should be accessible by walking, cycling, public transport and private car. By concentrating retail activity within the centre where public transport hubs are located it may reduce travelling by private car, but also makes the centre accessible by private car, this policy is likely to have both positive and negative impact on ET1 'To improve air quality' and ET4 'To reduce the effects of traffic upon the environment'. Proposed developments in the central shopping area would be on brownfield land and so would have a neutral effect on ET2. Focusing retail activity within the centre would contribute towards generating a level of increased presence within the centre and this could potentially lead to an increase in waste within the central shopping area though the increase would be limited to shopping related waste. This Policy scored negatively against ET3 'To reduce waste'.

4.5.3 This policy directly supports the SA Objective ET5 'To improve access to key services for all sectors of the population' and highlights the important serving role of the town centre to provide key service needs for the local surrounding population.. Policy DM47 promotes retail uses within the town centre, which are accessible by public transport. This would help reduce the use of private cars and greenhouse gas emissions. However, the policy may also result in increased use of private cars by people outside Ipswich and this would increase greenhouse emissions. This policy has scored both positively and negatively against ET6 'To limit and adapt to climate change' as the policy promotes retail uses within the town centre, which are accessible by public transport. The policy scores both negatively and positively against ET7 'To protect and enhance the quality of water features and resources and reduce the risk of flooding since developments may exacerbate flood risk but also provides an opportunity to incorporate SuDs which should reduce flood risk.

4.5.4 There are a number of trees with Tree Preservation Orders within the central shopping area. New shopping developments have potential to impact biodiversity resources but also provides

an opportunity for enhancement. This policy scores negatively against ET9 'To conserve and enhance the historic environment, heritage assets and their settings' and ET10 'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes'. There is potential for the new shopping and retail development to impact listed buildings and their settings as well as Areas of Archaeological Importance.

- 4.5.5 This policy focuses retail in the town centre and has been assessed as neutral against HW1 'To improve the health of those most in need'. However, the policy scores positively against HW2 'To improve the quality of life where people live and encourage community participation' and ER1 'To reduce poverty and social exclusion since the shopping areas and District Centres play a role within communities providing key services and facilities that meet the needs of residents and which would support the reduction of social exclusion.
- 4.5.6 This policy scores positively against ER2 'To offer everybody the opportunity for rewarding and satisfying employment' through employment opportunities within the town centre. This policy relates to retail and shopping and not housing so a neutral score against ER3 'To help meet the housing requirements for the whole community' has been recorded. This policy would contribute to economic growth of the borough and support the town centre. It therefore scores positively against ER4 'To achieve sustainable levels of prosperity and economic growth throughout the plan area' and ER5 'To support vital and viable town, district and local centres'.
- 4.5.7 This policy seeks to ensure that shopping and retail services are accessible to residents and protects shopping areas within the town centre; the policy scores positively against ER6 'To encourage efficient patterns of movement in support of economic growth' and ER7 'To encourage and accommodate both indigenous and inward investment. However, with new developments, there may be more opportunities for crime within the central shopping area and this policy scores negatively against CD1 'To minimise potential opportunities for crime and anti-social behaviour'.
- 4.5.8 The policy scores neutrally against: ET2 'To conserve soil resources and quality' since proposed developments in the town centre would be mostly on brownfield land; ET7 'To protect and enhance the quality of water features and resources and reduce the risk of flooding' since the central shopping area is not within flood zones; ER3 'To help meet the housing requirements for the whole community' since the policy relates to retail activities; and ER6 'To maintain and improve access to education and skills for both young people and adults'.

#### **DM48 Primary, Secondary and Specialty Shopping Areas and Frontages**

- 4.5.9 DM48 defines specific shopping areas with the Central Shopping Area, within which Core Strategy policy DM20 sets out the policy for development. DM20 indicates that the predominant land use at ground floor level within the primary, secondary and speciality shopping areas should be shops. This policy scores positively and negatively against ET1 and ET4 by concentrating shopping areas but these would also be accessed by car, which would contribute to traffic in the central shopping area. This policy scored neutrally against ET2 since these retail uses will be mostly on brownfield land and would not make a significant contribution to the quality of soil. This policy has scored negatively against ET3 since there will be increase in waste in the shopping areas. This policy scores positively against ET5 since these shopping areas would provide services within IP-One and the wider borough. This policy defines shopping uses within the central shopping area, which are accessible by public transport. This would help reduce the use of private cars and greenhouse gas emissions. However, the policy may result in increased use of private cars by people outside Ipswich and this would increase greenhouse emissions. This policy therefore scores positively and negatively against ET6.
- 4.5.10 There are a number of trees with preservation orders within the central shopping area. There may be potential impact on the biodiversity resources but it also provides opportunities for enhancement. This policy scored both positively and negatively against ET8. This policy scores

negatively against ET9 'To conserve and enhance the historic environment, heritage assets and their settings' and ET10 'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes'. There is potential for the new shopping and retail development to impact listed buildings and their settings as well as Areas of Archaeological Importance. However, mitigation measures are envisaged within policies in the Core Strategy.

4.5.11 This policy scored positively against ER1, ER2, ER4, ER5, and ER7 since shopping areas are likely to provide employment, encourage inward investment, economic growth, and support the town centre. Concentrating shopping areas within the central shopping area will also support ER6. This policy scored negatively against CD1 as there may be more opportunities for crime within these shopping areas.

4.5.12 This policy scored neutrally against the following SA Objectives: HW1, ER3, ET2, ET7 and CL1.

#### **DM49 Retail Site Allocations**

4.5.13 This policy relates to land at Westgate, allocated for A1 retail-led mixed use development, which could include other uses provided the predominantly retail use is delivered. . This policy is likely to have both positive and negative impacts on air quality (ET1), traffic (ET4) and climate change (ER6) by concentrating retail activity within the centre which may reduce travel by private car but may also draw in additional car journeys to the area,

4.5.14 Policy DM 49 will result in an increase in waste from the Westgate retail allocation.

4.5.15 This policy scores neutrally against ET5, as the retail site allocation in Westgate would provide retail use.

4.5.16 Policy DM49 promotes retail uses within the town centre, which are accessible by public transport. This would help reduce the use of private cars and greenhouse emissions. However, it may result in increased use of private cars from outside Ipswich and this would increase greenhouse emissions. As such, this policy scored both positively and negatively against ET6.

4.5.17 The policy provides for retail and mixed use in the town centre and as such, the policy has scored positively against SA Objectives ER7, ER5, ER4, ER2 and HW2. The policy has also scored positively against ER3 since retail development will incorporate some residential uses.

4.5.18 This policy is expected to have neutral effects on HW1, ET2, CL1, ET8, ET9 and ET7. Regarding ET9, there are no Listed Buildings in the vicinity of Westgate and it is unlikely that Listed Buildings would be affected by new developments. However, Westgate is within an archaeological importance but the policy relates to previously developed land and any impact on archaeological resources is unlikely.

#### **DM50 District and Local Centres within IP-One**

4.5.19 DM50 supports the district centres at Duke Street and Wherstead which will serve the local residential communities. This policy will indirectly support SA objective ET1 (air quality) by providing services locally, thereby reducing the need to travel by private cars. DM50 has scored positively against ET4 and ET10.

4.5.20 DM50 defines district centres in Wherstead and Duke Street shopping areas where new developments would also result in increase in waste and scores negatively against ET3. This policy scores positively against ET5 since the shopping area would provide key services to the local population.

4.5.21 This policy scores both negatively and positively against ET6 since promoting retail uses in district centres would help reduce travel for local people. However, some district centres, such as Wherstead Road, is within a flood zone. This policy scores negatively against ET7 since it is within a flood zone. There are a number of trees with preservation orders in district centres such as Wherstead Road, therefore there are potential impacts against ET8. Some district centres are within conservation areas, so there is potential to impact ET10. Wherstead Road and Duke Street are not within conservation areas. Developments in district centres may provide opportunities to increase crime; this policy scores negatively against CD1.

4.5.22 This policy is expected to have neutral effects on HW1, ER3, ET2, and CL1.

#### **DM51 Town Centre Boundary**

4.5.23 DM51 extends the town centre boundary to identify the area at the centre of Ipswich where development of non-retail main town uses will be located. The criteria for identifying the town centre boundary includes accessibility (within 800m of a main transport interchange) but does not specifically mention accessibility by public transport. This policy may result in an increased use of private cars particularly in relation to people that may be travelling to leisure or employment areas from outside Ipswich and this may negatively impact air quality. This policy has scored both positively and negatively against ET1, ET4 and ET6.

4.5.24 This policy will contribute to improving access to residents and therefore scored positively against ET5. This policy promotes non-retail town centre uses within IP-One, where a variety of work and leisure opportunities would be available. This policy scores negatively against ET6 and ET7 since the boundary covers flood risk areas. There are a number of trees with preservation orders within the town centre. New developments have the potential to impact trees and biodiversity resources. Negative scores against ET8 and ET9 were recorded since new developments have potential to impact listed buildings and their settings and conservation areas. However, it is accepted that Core Strategy Policies CS4 and DM9 would offer some protection. Extending the town centre boundary will contribute positively to HW2, ER1, ER2, ER4, ER5, ER6, ER7, HW2, ER1, ER2, ER4, ER5 and ER7. Extending the boundary of the town centre may increase opportunities for crime within larger area. This policy scores negatively against CD1.

4.5.25 This policy scores neutrally against ET2, ET3, HW1, and CL1.

#### **DM52 Ipswich Waterfront**

4.5.26 Policy DM52 relates to the Waterfront, which remains the focus for regeneration within central Ipswich to create mixed use neighbourhoods – residential, community, office, arts, culture and tourism. Much of the 80 ha area is developed but a few key sites remain to be redeveloped. This policy may result in an increased use of private cars by future residents who may travel to areas outside Ipswich and by people that may be travelling to these cultural facilities and employment areas from outside Ipswich and this may negatively impact air quality. However, the area is accessible by public transport, particularly for residents in the town centre. This policy scores positively and negatively against ET1, ET4 and ET10.

4.5.27 The proposed developments in DM52 within the Waterfront could potentially lead to an increase in waste production within the Waterfront. This policy scores negatively against ET3

4.5.28 This policy seeks developments within the Waterfront, comprising a mix of uses, such as residential, community, office, arts, culture and tourism. This policy scores positively against ET5. It would help reduce dependence on the private car through proposals for new housing, which would be accessible to the town centre. Policy DM52 relates to the Waterfront, which is adjacent to the River Orwell and the Neptune Marina and is within Flood Zones 2 and 3. Although the implantation of the tidal barrier and raised defences would raise the level of

protection, the area will still be within Flood Zone 3 as the Flood Zones are developed without flood defences. In addition there is still a residual risk of flooding by either failure of the new defences, or overtopping in extreme events. It scores negatively against ET7 as developments may increase the risk of flooding.

- 4.5.29 Policy DM52 relates to the Waterfront Area, which is adjacent to the River Orwell where developments have potential to have an impact on water species and habitats. Although the Appropriate Assessment on the adopted Core Strategy does not identify any threat from development at the waterfront, there may be disturbance from construction activities.

#### **Policy DM53 – Education Quarter**

- 4.5.30 DM53 focuses development for education and ancillary uses, such as student accommodation or offices within the Education Quarter. This policy is likely to have a positive impact within the quarter and reduce travelling by private car since the developments would be within the Suffolk New College Campus and the University Campus Suffolk. This policy scores positively against ET1, ET4 and ER6. Developments proposed within DM53 could potentially lead to an increase in waste within the Education Quarter and has a negative score against ET3. DM53 directly supports the SA Objective ET5 and highlights the important serving role of the Education Quarter as an area to provide key service needs for the academic institutions and the local surrounding population.
- 4.5.31 This policy scores both positively and negatively against ET6. It would help reduce dependence on the private car by supporting student accommodation accessible to the University Campus Suffolk and the Suffolk New College. However, the policy applies to areas within flood zones and any new developments would increase flood risk.
- 4.5.32 Policy DM53 scores negatively against ET7 since the Education Quarter is located adjacent to the Neptune Wharf and this area is within Flood Zones 2 and 3. A section of the University Quarter (open space and car parks) is adjacent to the Neptune Marina. Potential negative impacts are likely to be negligible. However, the University Quarter has some mature trees and is adjacent to Alexandra Park, where there are also mature trees, which may be affected by new developments. A negative score against ET8 has been recorded.
- 4.5.33 This policy scores negatively against ET9 and ET10. There are a number of listed buildings within and in the vicinity of the Education Quarter, therefore there is potential for new developments relating to Policy DM53 to have an impact on the listed buildings and their settings during construction periods. The Education Quarter lies outside the Conservation Areas. It adjoins the Central and St Helens Conservation Areas. There is potential for new developments to impact historical sites and areas of archaeological importance. However, it is accepted that Core Strategy Policies CS4 and DM9 would offer some protection.
- 4.5.34 The policy scores positively against the following SA Objectives: HW1, HW2, ER2, ER3, ER4, ER5, ER6, and CL1. DM53 seek provision of residential accommodation which may have indirect health benefits from good quality housing. DM53 seek to provide residential and educational ancillary uses, which would contribute to the quality of life of students and the local community. DM53 would make some contribution to the SA Objective through providing the educational community with key services and facilities which would support the reduction of social exclusion. This policy would also contribute to SA Objectives by seeking to provide employment in developments relating to educational ancillary uses and residential accommodation. It will support the economic growth, the vitality of the town centre and the Education Quarter and would encourage investment. By providing for ancillary services, it supports access to education.
- 4.5.35 This policy has both negative and positive scores against CD1. It is possible that development within, and overall regeneration of the Education Quarter would increase natural surveillance

and potentially contribute to a reduction in crime levels. However, there may be increased opportunities for crime within the town centre due to increase in population and businesses.

4.5.36 This policy scores neutrally against SA Objective ET2.

#### **Policy DM54 – Tourism and Culture**

4.5.37 DM54 support the retention and enhancement of existing facilities, providing for arts, culture and tourism facilities and the creation of new facilities including visitor accommodation within the town centre boundary and the Waterfront area. The facilities will be focused in the town centre, which is well served by public transport which may reduce impact on air quality. However, there may also be those who would travel by private car to these facilities. This policy scores both positively and negatively against SA Objectives ET1, ET4 and ER6.

4.5.38 This policy scores negatively against ET3. The development of cultural facilities and visitor accommodation as proposed in DM54 could also lead to an increase in waste within the Waterfront and within the town centre.

4.5.39 This policy directly supports the SA Objective ET5 as it seeks to provide arts, cultural and tourism services to the surrounding population and the wider area around Ipswich. This policy scores both positively and negatively against ET6 as it provides for arts, culture and tourism services within the town centre, which is well served by public transport. However, the Waterfront, where this policy applies is within a flood risk zone. Developments would have potential to increase flood risk. Due to this, the policy scores negatively against ET7.

4.5.40 DM54 proposes arts, cultural and tourism facilities in the town centre and visitor accommodation in the Waterfront, where developments have potential to impact freshwater species and habitats. A negative score is recorded against ET8.

4.5.41 This policy scores negatively against ET9 and ET10. However, it is accepted that Core Strategy Policies CS4 and DM9 would offer some protection. Policy DM54 applies to the town centre, where there are a number of listed buildings or their settings which may be directly affected by new developments relating to arts, culture and tourism. Most of the town centre is within the Central Conservation Area, so there is potential for new developments to impact historical sites. DM54 relate to Waterfront, the Education Quarter and the town centre which are within Conservation Areas – Central and Wet Dock. Depending on the design of the new developments, there is potential to impact townscape.

4.5.42 This policy scores positively against HW2, ER1, ER2, ER3, ER4, ER5, ER6, ER7, and CL1. DM54 seeks to provide residential, arts, tourism and cultural facilities within the Waterfront and the town centre. New developments will contribute to the vitality and vibrancy of these areas and help to improve quality of life of residents as well as contribute towards encouraging community participation. The arts and cultural facilities would also support the reduction of social exclusion. There will be contribution to employment opportunities from the arts, culture and tourism uses. This policy will support economic growth and may encourage investment in the borough.

4.5.43 This policy has both negative and positive scores against CD1. It is possible that development within, and overall regeneration of the Education Quarter would increase natural surveillance and potentially contribute to a reduction in crime levels. However, there may be increased opportunities for crime within the town centre due to increase in population and businesses.

4.5.44 This policy scores neutrally against SA Objectives HW1, ET2 and ER3 and CL1.

### **Policy DM55 – Pedestrian and Cycle routes in IP-One**

- 4.5.45 DM55 supports improvements to pedestrian and cycle routes within the town centre and those linking the town centres to residential areas and beyond, which is likely to contribute to air quality, reduction of car use and efficient movement of traffic. It scores positively against ET1, ET4 and ER6.
- 4.5.46 This policy scores positively against ET5 and ET6. Policy DM55 would improve access to services within the town centre and also the wider area. The provision of cycling and walking routes may reduce car use.
- 4.5.47 This policy scores positively against HW1. By improving pedestrian and cycle routes Policy DM55 may encourage people to cycle or walk and the exercise would have health benefits.
- 4.5.48 DM54 supports the SA Objective ER5 by making the town centre accessible by cycling and walking. This increased accessibility would encourage people into the town centre and contributing to its' vitality.
- 4.5.49 This policy scored neutrally against ET2, ET3, ET7, ET8, ET9, ET10, HW2, ER1, ER2, ER3, ER4,CL1 and CD1,

### **Policy DM56 – East-west Traffic**

- 4.5.50 DM56 safeguards provision of a new Wet Dock Crossing. Upon completion, the Star Lane Gyratory will be reduced to one lane in each direction, which would facilitate access between the Waterfront and Central Shopping Area. The Star Lane Gyratory, which is a key east-west corridor, causes congestion and poor air quality as well as a barrier to pedestrian movement between the Waterfront and the Central Shopping Area. This policy is likely to have impact both positive and negative impacts on ET1, ET4 and ET6 since reducing to one lane each way may reduce cars on the gyratory but it may also result in longer queues
- 4.5.51 Policy DM56 would provide a pedestrian crossing between the Waterfront and Central Shopping Area, which would improve access to services by both the Waterfront residents and those in the Central Shopping Area. This policy scores positively against ET5.
- 4.5.52 Policy DM56 will improve access within the Waterfront, the town centre and areas beyond, which will help support the vitality of the town centre and ER5. This policy has potential to have negative impacts on ET9 and ET10. Parts of the gyratory pass through the Wet Dock and Central Areas and the gyratory has potential to impact Conservation Area characters and townscape.
- 4.5.53 This policy scored neutrally against ET2, ET3, ET7, ET8, HW1, HW2, ER1, ER2, ER3, ER7, CL1 and CD1.

### **Policy DM57 – Town Centre Parking**

- 4.5.54 DM57 provides for a Central Car Parking Core within town centre. Car parks are proposed in the Mint Quarter, Shedwell Orwell Quay and Turret Lane, which are within or close to Air Quality Management Areas. The policy states that it supports the Travel Ipswich measures and encourages the use of sustainable modes of transport. However, providing car parks in the town centre would have an adverse effect on air quality, traffic and efficient movement of traffic. This policy scores negatively against ET1, ET4 and ER6.
- 4.5.55 DM57 would improve access to services within the town centre from within the borough and surrounding areas as people can drive into the centre. It therefore scores positively against ET5.



- 4.5.56 Providing for public car parks within the town centre as proposed in DM57 would increase greenhouse emissions. This policy therefore scores negatively against ET6.
- 4.5.57 Policy DM57 relates to car parks within the town centre. Car parks south and southwest of the town centre are within Flood Zones 2 and 3. Developments in these areas have potential to increase flood risk.
- 4.5.58 Policy DM57 may have potential to impact Listed Buildings and their settings as there are listed buildings in the vicinity of the Crown Street, Mint Quarter, and Turret Lane, where car parks are proposed. Shed 8 Orwell Quay and Turret Lane are located in an Area of Archaeological Importance.
- 4.5.59 Policy DM57 supports the development of car parks, which have the potential to impact the character of Conservation Areas and has scored negatively against ET10. Shed 8 Orwell Quay is adjacent to a Conservation Area. Turret Lane is within a Conservation Area. Turret Lane is partly within a Conservation Area and Crown Street is adjacent to a Conservation Area. Depending on the design of the car parks, these have potential to impact the character of the Conservation Areas.
- 4.5.60 Car parks would encourage people from within and outside the borough to drive into the town centre, which would contribute to the vitality of the town centre. DM57 recognises that providing sufficient car parking in the town centre may support the town centre economy and encourage investments. This policy scores positively against ER5 and ER7.
- 4.5.61 This policy scored neutrally against ET2, ET3, ET7, ET8, HW1, ER1, ER2, ER3, ER4, CL1, and CD1.

## Recommendations

- 4.5.62 To improve the sustainability of these policies, the following are recommended:
- It is recommended that Policy DM51 make reference to transport facilities associated with the areas where the town centre boundary has been extended. Policy DM50 should make reference to walking and cycling routes to these centres.
  - It is recommended that Policies should include reference to the provision of adequate waste facilities and where possible recycling facilities within the Central Shopping Area, Westgate and district centres.
  - It is recommended that these policies include reference to ensuring that new development does not exacerbate current flood risk issues in the area and the use of SuDs, wherever practicable.
  - It is recommended that Policies should include a reference to the design of new developments to be sensitive to Conservation Area characters and the protection of heritage assets.
  - It is recommended that Policies DM47, DM48, DM49, DM50 and DM51 make reference to incorporating safety by design which would contribute towards reducing the potential for crime and anti-social activities.

## 4.6 Appraisal of Opportunity Areas

4.6.1 The IP-One Opportunity Areas include the following:

**A- Island Site**

**B- Merchant Quarter**

**C- Mint Quarter and surrounding area**

**D- Education Quarter and surrounding area**

**E- Westgate**

**F- River Corridor and Princes Street Corridor**

4.6.2 The detailed assessments of the opportunity areas are included in Appendix H. The following section presents the summary of the findings.

### **Opportunity A – Island Site**

4.6.3 The regeneration of Opportunity Area A – The Island Site will increase traffic in this area, which would have a negative effect on air quality. However, Area A is close to but not within an Air Quality Management Area (AQMA). Green areas and the reinstatement of the tree lined promenade may have a positive effect on air quality. This Opportunity Area scores positively and negatively against ET1, ET4 and ER6.

4.6.4 Developments in Opportunity Area are mostly on brownfield sites. There are proposals to include some green areas in this Opportunity Area, which may improve soil quality. This Opportunity Area scores positively against ET2.

4.6.5 Opportunity Area A includes residential developments, which would increase household waste in the Borough. Other uses in mixed use developments– offices, cafes and restaurants would also produce waste. This Opportunity Area scores negatively against ET3.

4.6.6 Regeneration and redevelopment of Opportunity Area A, would improve access to services and scores positive against ET5. This Opportunity Area provides for heritage/cultural based visitor attractions, marina moorings, retail, cafes and restaurants.

4.6.7 Opportunity Area A scores positively and negatively against ET6. This Opportunity Area is accessible by public transport. This would help reduce the use of private cars and greenhouse gas emissions. However, developments within these areas may result in increased use of private cars by people outside Ipswich and this would increase greenhouse emissions. Opportunity Area A is in the vicinity of the River Orwell and Neptune Wharf and is within Flood Zones 2 and 3. Development may increase flood risk.

4.6.8 Opportunity Area A scores negatively against ET7 and ET8 since the area is within Flood Zones 2 and 3. Development has potential to increase flood risk. The area around Opportunity Area A – Island Site covering the area west of the Orwell River and the Wet Dock area is designated as a Country Wildlife Site. It is also close to the Orwell Estuary Special Protection Area. There is potential for developments to have a negative effect on the species and habitats on the river, such as disturbance to birds during construction, therefore mitigation measures should be implemented and HRA assessment should be undertaken for developments.

4.6.9 This Opportunity Area scores both positively and negatively against ET9 and ET10. There are no listed buildings on Opportunity Area A but it is within an area of archaeological importance.

There is potential for new development to have an impact on archaeological resources within the area during construction periods. The conversion of historic buildings should be sensitive to the character of the buildings. The Opportunity Area refers to enhancing the setting of historic buildings such as Felaw Maltings. Opportunity Area A is within the Wet Dock Conservation Area and there is potential to impact the character of the Conservation Area but also provides an opportunity to enhance townscape.

- 4.6.10 Opportunity Area A scores both positively and negatively against HW1. Opportunity Area A proposes residential developments, which would improve the housing stock within the Borough. Good quality housing will indirectly contribute positively to this SA Objective. However, new developments would increase traffic and affect air quality, which could also have a negative impact on health.
- 4.6.11 This Opportunity Area scores positively against HW2, ER1, ER2, ER3, ER4, ER5, and ER7. Opportunity Area A proposes employment, small scale retail, heritage and cultural based visitor attraction as well as public open space and waterfront promenade which would contribute to the quality of life within the Ipswich Waterfront. It would make some contribution to reducing poverty and social exclusion through providing communities with employment areas, key services and facilities. This policy supports employment, economic growth, housing, the town centre and district and local centres, and would encourage investment.
- 4.6.12 This Opportunity Area scores neutrally against CL1 since it does not contribute to this SA Objective. Opportunity Area A scores both positively and negatively against CD1. There may be increased opportunities for crime within the Opportunity Areas due to the increase in population, shops and businesses. However, increased employment opportunities and improved living standards may also contribute to the reduction of crime. The development of vacant sites and opening of spaces to further community use could lower anti-social behaviour incidences.

#### **Opportunity Area B – Merchant Quarter**

- 4.6.13 This Opportunity Area scores negatively against SA Objective ET1. A section of the Opportunity Area B - Merchant Quarter is within an AQMA. This covers the area between Star Lane, College Street, and Fore Street. Increased development of sites in this area will result in increased traffic, which would have a negative effect on air quality. However, the area is accessible by public transport and pedestrian links are proposed, which may partially reduce traffic levels within the area and its impact on air quality.
- 4.6.14 The score for ET2 is uncertain. Developments in Opportunity Area B would mostly be located on brownfield sites. Remediation, if required, would improve soil quality.
- 4.6.15 This Opportunity Area scores negatively against ET3. Proposed residential developments would increase household waste in the Borough. Other uses in mixed use developments—offices, cafes and restaurants would also produce waste.
- 4.6.16 Opportunity Area B scores both positively and negatively against ET4 and ER6. Increased development within the Opportunity Area B would increase traffic as people from neighbouring areas may travel to this Quarter for shopping or work. However, pedestrian links are proposed in the Merchant Quarter. These would contribute partially towards reducing traffic levels within the town centre and may help encourage people to make more sustainable transport choices in the long term.
- 4.6.17 This Opportunity Area scores positively against ET5 since regeneration developments would increase access to services. Opportunity Area B provides for offices/businesses, cafes/restaurants and small scale retail.

- 4.6.18 This Opportunity Area B scores both negatively and positively against ET6. Opportunity Area B is accessible by public transport. This would help reduce the use of private cars and greenhouse gas emissions. Since the area is already built up, any development will be redevelopment of existing buildings. As such, it is unlikely that there would be impact on flood risk. This Opportunity Area scores neutrally against ET7.
- 4.6.19 This Opportunity Area also scores negatively against ET8. Opportunity Area B is adjacent to the River Orwell and therefore new developments along the river have potential to impact habitats and species along the river, particularly during construction.
- 4.6.20 This Opportunity Area scores both positively and negatively against ET9, ET10 and HW1, There are a number of listed buildings on Opportunity Area B, which are also in areas of archaeological importance. There is potential for the listed buildings and their setting to be directly affected by new development during construction. However, this Opportunity Area refers to opportunities to reinforce existing historic character and Core Strategy Policies CS4 and DM9 offer some protection. This Opportunity Area lies between the Central and Wet Dock Conservation Areas and developments have the potential to impact the character of the Conservation Areas. However, improved public realms are proposed, which may enhance townscape character.
- 4.6.21 This Opportunity Area scores positively against HW1 since it proposes residential developments, which would increase the housing stock in the borough. However, new developments would increase traffic and affect air quality, which could also have a negative impact on health.
- 4.6.22 Opportunity Area B scores positively against HW2, ER1, ER2, ER3, ER4, ER5, and ER7. Opportunity Area B proposes residential, business, cafes and, small scale retail uses which provide key services and facilities to meet the needs of residents and improve the quality of life, within the Merchant Quarter and surrounding areas. It would make some contribution to reducing poverty and social exclusion through providing communities with employment areas, key services and facilities. This policy supports employment, economic growth, housing, the town centre and district and local centres, and would encourage investment.
- 4.6.23 This Opportunity Area scores neutrally against CL1 since it does not contribute to this SA Objective. Opportunity Area B scores both positively and negatively against CD1. There may be increased opportunities for crime within the Opportunity Areas due to the increase in population, shops and businesses. However, increased employment opportunities and improved living standards may also contribute to the reduction of crime. The development of vacant sites and opening of spaces to further community use could lower anti-social behaviour incidences.

#### **Opportunity Area C – Mint Quarter and Surrounding Area**

- 4.6.24 Opportunity Area C- Mint Quarter is not within an AQMA but redevelopment in the area of non-retail use, particularly residential and car parking would potentially increase traffic in the area. However, since the redevelopment would be located on an existing surface car park, the overall effect may depend on the number of new car parking spaces.. In addition, this area is accessible by public transport and pedestrian links are proposed, which may reduce traffic and its impact on air quality. This Opportunity Area scores both positively and negatively against ET1.
- 4.6.25 The score for ET2 is uncertain. Developments in the Mint Quarter would be located on brownfield sites. Any contaminated sites would require a contaminated land risk assessment if developed. Remediation, if required, would improve soil quality.

- 4.6.26 This Opportunity Area scores negative against ET3. Proposed residential developments would increase household waste in the Borough. Other uses in mixed use developments– offices, cafes and restaurants would also produce waste.
- 4.6.27 Opportunity Area C scores both positively and negatively against ET4. Increased development within the Opportunity Area C would increase traffic. However, pedestrian links are proposed in the Mint Quarter. These would contribute partially towards reducing traffic levels within the town centre and may help encourage people to make more sustainable transport choices in the long term.
- 4.6.28 This Opportunity Area scores positively against ET5 since regeneration developments would increase access to services. Opportunity Area C provides for offices/businesses, cafes/restaurants and small scale retail.
- 4.6.29 This Opportunity Area scores both negatively and positive against ET6. Opportunity Area C is accessible by public transport. This would help reduce the use of private cars and greenhouse gas emissions. However, developments within the Mint Quarter may result in increased use of private cars by people outside Ipswich and this would increase greenhouse emissions.
- 4.6.30 This Opportunity Area scores neutrally against ET7 and ET8. The Mint Quarter is not within a flood zone and it is within a built up area and have limited potential to impact biodiversity and flood risk.
- 4.6.31 Opportunity Area C scores both positively and negatively against ET9 and ET10. There are a number of listed buildings in the Mint Quarter, which is also in an area of archaeological importance. There is potential for the listed buildings and their setting to be directly affected by new development during construction but there are also improved public realms proposed. It is accepted that Core Strategy Policies CS CS4 and DM9 offer some protection. Opportunity Area C is also partly within a Conservation Area and there is potential for developments to impact the character of the Conservation Area and townscape. However, there are also opportunities for enhancement.
- 4.6.32 Opportunity Area C scores positively against HW2, ER1, ER2, ER3, ER4, ER5, and ER7. Opportunity Area C proposes residential, business, cafes and, small scale retail uses which provide key services and facilities to meet the needs of residents and improve the quality of life, within the Mint Quarter and surrounding areas. It would make some contribution to reducing poverty and social exclusion through providing communities with employment areas, key services and facilities. This policy supports employment, economic growth, housing, the town centre and district and local centres, and would encourage investment.
- 4.6.33 This Opportunity Area scores neutrally against CL1 since it does not contribute to this SA Objective. Opportunity Area C scores both positively and negatively against CD1. There may be increased opportunities for crime within the Opportunity Areas due to the increase in population, shops and businesses. However, increased employment opportunities and improved living standards may also contribute to the reduction of crime. The development of vacant sites and opening of spaces to further community use could lower anti-social behaviour incidences.

#### **Opportunity Area D – Education Quarter and surrounding area**

- 4.6.34 The area along Star Lane, Grimwade Street, Fore Street and Duke Street within Opportunity Area D – Education Quarter is within an AQMA. Additional car parking will increase road traffic in this area, which would have a negative effect on air quality. This Opportunity Area scores negatively against ET1.

- 4.6.35 The score for ET2 is uncertain. Developments within the Education Quarter would mostly be located on brownfield sites. Remediation, if required, would improve soil quality.
- 4.6.36 This Opportunity Area scores negatively against ET3. Proposed residential developments would increase household waste in the Borough. Other uses in mixed use developments—offices, cafes and restaurants would also produce waste.
- 4.6.37 Opportunity Area D scores both positively and negatively against ET4. Increased development and proposed car parking within the Opportunity Area would increase traffic. However, improved pedestrian links are proposed within the Opportunity Area. These would contribute partially towards reducing traffic levels within the town centre and may help encourage people to make more sustainable transport choices in the long term.
- 4.6.38 This Opportunity Area scores positively against ET5 since regeneration developments would increase access to education related services. This Opportunity Area provides for residential, hotel, offices/businesses, cafes/restaurants and small scale retail.
- 4.6.39 This Opportunity Area scores both negatively and positively against ET6 and negatively against ET7. The Education Quarter is accessible by public transport, which would help reduce the use of private cars and greenhouse gas emissions. However, developments within the Education Quarter may result in increased use of private cars by people outside Ipswich and this would increase greenhouse emissions. Parts of the Education Quarter are within Flood Zone 2 and 3. Development in these areas may increase flood risk.
- 4.6.40 This Opportunity Area scores neutrally against ET8. The southern section in Opportunity Area D is located adjacent to the Wet Dock, where car parks are proposed. The area is currently a hard surfaced car park. As such, redevelopment would not increase surface water run-off. The design of the new car park should ensure that surface water run-off is contained.
- 4.6.41 Opportunity Area D scores both positively and negatively against ET9 and ET10. There are a number of listed buildings on the Education Quarter, which is also in an area of archaeological importance. There is potential for the listed buildings and their setting to be directly affected by new development during construction. Small parts of the Education Quarter fall within the Central Conservation Area and there is potential for developments to impact the character of the Conservation Area and townscape. However, there are also opportunities for enhancement.
- 4.6.42 Opportunity Area D scores positively against HW2, ER1, ER2, ER3, ER4, ER5, and CL1. Opportunity Area D proposes academic facilities and support facilities, student accommodation, hotel, business, cafes and, small scale retail uses which provide key services and facilities to meet the needs of residents and improve the quality of life, within the Education Quarter and surrounding areas. It would make some contribution to reducing poverty and social exclusion through providing communities with employment areas, key services and facilities. This policy supports employment, economic growth, housing, the town centre and district and local centres, and would encourage investment.
- 4.6.43 Opportunity Area D scores both positively and negatively against CD1. There may be increased opportunities for crime within the Opportunity Areas due to the increase in population, shops and businesses. However, increased employment opportunities and improved living standards may also contribute to the reduction of crime. The development of vacant sites and opening of spaces to further community use could lower anti-social behaviour incidences.

#### **Opportunity Area E - Westgate**

- 4.6.44 This Opportunity Area scores both positively and negatively against SA Objectives ET1, ET4 and ER6. The regeneration of Opportunity Area E – Westgate includes a pedestrian link and new level crossings which would improve pedestrian movement within the area. The area is not

within an AQMA. However, high density residential housing and shoppers' car parking are proposed. Also, NO<sub>2</sub> emissions along St Matthew Street have been recorded as high.

- 4.6.45 The score for ET2 is uncertain. Developments within Westgate would mostly be located on brownfield sites. Some sites may need to be remediated before any redevelopment. Remediation would improve soil quality.
- 4.6.46 This Opportunity Area scores negatively against ET3. Proposed residential developments would increase household waste in the Borough. Other uses in mixed use developments—offices, cafes and restaurants would also produce waste.
- 4.6.47 This Opportunity Area scores positively against ET5 since regeneration developments would increase access to shops and cultural facilities such as the New Wolsey Theatre. This Opportunity Area provides for residential, café/restaurants, retail shops and car parking.
- 4.6.48 This Opportunity Area scores both negatively and positively against ET6. Westgate is accessible by public transport, which would help reduce the use of private cars and greenhouse gas emissions. However, developments within Westgate, including car parking, may result in increased use of private cars by people outside Ipswich and this would increase greenhouse emissions.
- 4.6.49 Opportunity Area E scores neutrally against ET7 and ET8 since Westgate is not within a flood zone and this is a built up area and has limited potential to impact biodiversity.
- 4.6.50 Opportunity Area E scores both positively and negatively against ET9 and ET10. There are a number of listed buildings in Westgate, which is also in an area of archaeological importance. There is potential for the listed buildings and their setting to be directly affected by new development during construction. Westgate is adjacent to the Central Conservation Area and developments have the potential to impact townscape. However, improved public realm is proposed for Westgate, where there are opportunities for enhancement.
- 4.6.51 Opportunity Area E scores positively against HW2, ER1, ER2, ER3, ER4, ER5, and ER7. Opportunity Area E proposes shopping, residential, café/restaurant uses which provide key services and facilities to meet the needs of residents and improve the quality of life, within Westgate and surrounding areas. It would make some contribution to reducing poverty and social exclusion through providing communities with employment areas, key services and facilities. This policy supports employment, economic growth, housing, the town centre and district and local centres, and would encourage investment.
- 4.6.52 This Opportunity Area scores neutrally against CL1 since it does not contribute to this SA Objective. Opportunity Area E scores both positively and negatively against CD1. There may be increased opportunities for crime within the Opportunity Areas due to the increase in population, shops and businesses. However, increased employment opportunities and improved living standards may also contribute to the reduction of crime. The development of vacant sites and opening of spaces to further community use could lower anti-social behaviour incidences.

#### **Opportunity Area F – River Corridor and Princes Street Corridor**

- 4.6.53 Opportunity Area F – River Corridor and Princes Street Corridor are not within AQMAs. The area of car parking to the east of Portman Road has been identified as having potential for a mixed use development. The allocation would require replacement of the car parking on the site or a nearby site; although the large car park may be removed, it would need to be replaced nearby. As such, the development would have a neutral effect on transport and air quality. However, new pedestrian and cycle links are proposed along the Waterfront area which would reduce car use and its impact on air quality. Overall, this Opportunity Area scores positively

against ET1, ET4 and ER6. The score for ET2 is uncertain. Developments within the River Corridor and Princes Street Corridor would mostly be located on brownfield sites. Remediation, if required, would improve soil quality.

- 4.6.54 Opportunity Area F would be mainly offices and leisure uses and is expected to produce office waste. The effect would not be as significant as residential units and the score against ET3 is considered neutral.
- 4.6.55 This Opportunity Area scores positively against ET5 since regeneration developments would increase access to shops and cultural facilities such as the New Wolsey Theatre. This Opportunity Area provides for residential, café/restaurants, retail shops and car parking.
- 4.6.56 Opportunity Area F scores both negatively and positively against ET6 and negatively against ET7. The River Corridor is near the railway station and the Princes Street Corridor links the station to the centre of town. There are proposals to enhance the riverside connection to the Waterfront Area as a setting for new pedestrian and cycling links. The River Corridor is within Flood Zone 2 and 3. Development in the area may increase flood risk.
- 4.6.57 This Opportunity Area scores negatively against ET8. Opportunity Area F is along the River Corridor and east of Princes Street is a Country Wildlife site. There is potential for development to impact species and habitats along the river.
- 4.6.58 Opportunity Area F scores neutrally against ET9 and both positively and negatively against ET10. There is a listed building in the area and there is potential for new development to impact the listed building or its setting. However, the potential impact is considered negligible. Opportunity Area F is not within or adjacent to Conservation Areas. However, the river corridor is along the River Orwell and a County Wildlife Site and new developments have potential townscape impacts. This Opportunity Area proposes an improved public realm in front of the station, which would contribute to the visual amenity in the area.
- 4.6.59 Opportunity Area F scores positively against HW1, HW2, ER1, ER2, ER4, ER5, and CL1. Opportunity Area F proposes leisure uses, which would have an indirect effect on health. It would contribute to the quality of life for commuters and also the residents along Princes Street and nearby areas. Office led mixed development is proposed, which would make some contribution to reducing poverty and social exclusion through providing communities with employment areas, key services and facilities. This policy supports employment, economic growth and would encourage investment.
- 4.6.60 This Opportunity Area scores neutral against ER3 since no residential use is proposed.
- 4.6.61 Opportunity Area F scores both positive and negative against CD1. There may be increased opportunities for crime within the Opportunity Areas due to the increase in population, shops and businesses. However, increased employment opportunities and improved living standards may also contribute to the reduction of crime. The development of vacant sites and opening of spaces to further community use could lower anti-social behaviour incidences.

## Recommendations for Mitigation Measures

- 4.6.62 The following recommendations are proposed for the Opportunity Areas:
- It is recommended that all Opportunity Areas should make reference to improving walking and cycling routes in these areas.
  - It is recommended that Opportunity Areas should include a reference to providing landscaped areas and green spaces where practicable.



- It is recommended that Opportunity Areas should include reference to the provision of adequate waste facilities and where possible recycling facilities within the areas.
- It is recommended that Opportunity Areas include reference to community facilities such as community halls and health facilities.
- It is recommended that these Opportunity Areas include reference to ensuring that new development does not exacerbate current flood risk issues in the area and the use of SuDs.
- It is recommended that ecological assessments should be undertaken during the design phase of development proposals which are likely to affect biodiversity resources.
- It is recommended that Opportunity Areas include a reference to the protection of sites of historical importance.
- It is recommended that Opportunity Areas A, B, C and D include a reference to the design of new developments being sensitive to the character of the Conservation Areas. Opportunity Area B should include a reference to the design of new developments being sensitive to the river corridor landscape.
- It is recommended that Opportunity Areas make reference to incorporating safety by design which would contribute towards reducing the potential for crime and anti-social activities.

## 4.7 Cumulative effects

- 4.7.1 The SEA Directive requires that the assessment includes identification of cumulative and synergistic effects (where the combined effects are greater than the sum of their component parts).
- 4.7.2 The assessment of the policies and site allocations has been undertaken in a manner which has enabled the cumulative effects of the policies to be assessed. This is important as none of the policies or site allocations would ever be implemented in isolation and the plan has to be read as a whole. There is also the potential for the plan to have cumulative effects with other plans and programmes that are produced by other authorities such as neighbouring local authorities or the Environment Agency.
- 4.7.3 Table 4-6 summarises the cumulative and synergistic impacts of the plan. The approach identifies receptors, for example the air quality or crime levels that may be affected by cumulative impacts. It also acknowledges where uncertainty has influenced the assessment.

**Table 4-6 Cumulative and Synergistic Effects**

<b>Receptor</b>	<b>Cumulative / Synergistic Effect (Positive, Negative, Neutral)</b>	<b>Commentary and Causes</b>
Education provision and educational attainment.	Positive	Educational attainment in the borough is generally lower than regional and national levels.  The policies/site allocations are likely to generate positive effects upon educational attainment through the allocation of land for employment use, primary and secondary schools and where necessary for students accommodation. New and diverse employment provision is likely to increase training opportunities, and encourage local partnerships and initiatives. All the residential site allocations in the IP-One area may benefit from the close location of University Campus Suffolk and Suffolk New College.

Receptor	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
Crime and Fear of Crime	Negative	Crime levels are generally higher across the borough when compared to national average figures. The projected housing and population growth may result in a significant increase of new residents. This increase in population may have a negative effect on crime within the Borough in the short term, however it can be mitigated cumulatively through improved quality of life. The level of certainty of prediction is low as many factors could influence the receptor.
Access to goods and services	Positive/Negative	Cumulatively, access could be improved where sites are located in the town centre near existing facilities and employment hubs. However, if all the sites are taken forward negative effects associated with access are likely to occur on key roads in the town centre or the approach roads due to increased traffic and congestion. Mitigation measures will be required to reduce the negative effects, e.g. improved transport links, pedestrian infrastructure, etc.
Health and Well-Being	Positive	Life expectancy from birth for males is slightly lower than the national average and life expectancy from birth for females is slightly higher than national averages. Whilst health and well-being is affected by a number of factors, there is the potential to improve well-being by delivery of new housing and employment, areas of open/green space and the provision of new schools. In the long-term there could be indirect benefits for health and well-being within areas where sites are allocated for new parks, river paths, and playing grounds.  Further measures should be undertaken to encourage healthy lifestyles by significant improvements of the cycling infrastructure.
Housing	Positive	Cumulatively, the site allocations for residential use should ensure that new housing development occurs in the most appropriate locations and meets the needs of a wide range of people. The residential site allocations should be planned in a way that it does not lead to oversupply of flats particularly in the town centre.
Sustainable Economic Growth	Positive	Cumulatively, the site allocations for employment/retail/office use will have a positive effect on the sustainable growth of the borough as employment opportunities will increase both in the short-term and the long-term. The sites will contribute to the regeneration / redevelopment of central town areas, with some infrastructure improvements (car parking, the replacement of an electricity substation, etc.) which may increase the business attractiveness of the area.
Biodiversity – protection of designated sites	Negative/Positive	Cumulatively, the site allocations will have negative effects on biodiversity through land take for new developments, community facilities and infrastructure which may potentially result in fragmentation and potential loss of habitats and species. Although the new eco network policy aims to prevent fragmentation, there may still be cases where this may occur. Some positive effects may occur as a result of the delivery of open space but cumulatively the amount of land allocated for open space does not suggest a

Receptor	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
		significant positive effect. The allocation to extend the Orwell Country Park on Pond Hall Farm would be a positive effect on biodiversity. The remediation of contaminated land may have positive indirect effects.
Landscape/Townscapes	Negative/Positive	Cumulatively, there is potential for urban expansion and projected growth to have a negative effect on landscape through the loss of greenfield sites. Cumulative impacts on townscape are due to significant changes in townscape character and the concentration of a great number of listed buildings in the town centre. However, there are proposals for the improvement of public realms, which would contribute to townscape. Mitigation measures should be implemented where designated sites are likely to be affected (e.g. appropriate scale, density, and layout design) to reflect the local townscape/landscape character.
Climate Change Air Quality Energy Efficiency Natural Resources Sustainable Transport Transboundary	Negative/Neutral	<p>There is a degree of uncertainty about these cumulative effects being realised as this is reliant upon travel choices of individual residents and workers. The majority of site allocations in the IP-One area have the potential to encourage the use of sustainable modes of transport and cumulatively have a positive/neutral effect on greenhouse emissions. There are areas where public transport and pedestrian infrastructure could be improved to help tackle congestion and air quality issues.</p> <p>Transboundary issues relate to people travelling to and from Ipswich for shopping or work. Although there may be increase in retail and employment uses, these are not considered significant and any traffic impacts are not considered significant.</p> <p>New development across the borough has the potential to result in a cumulative increase in the use of natural resources and waste generation. Mitigation measures should be implemented to minimise the potential cumulative negative effects.</p>
Water Resources	Negative /Positive	New development is likely to place pressure on water resources and increase consumption of water resources. However, there is mitigation suggested within the site allocations assessment to ensure sustainable design, appropriate flood risk management and sustainable (urban) drainage systems incorporated into new development. The enhancement of the green infrastructure network across the borough will also provide benefits for infiltration and water management. Mitigation should also be implemented to encourage measures to reduce potable demand, use of rain water harvesting and greywater recycling systems to reduce domestic water use.

## 5 NEXT STEPS

- 5.1.1 This Interim SA is being issued for informal consultation alongside the Draft Site Allocations DPD from January to March 2014. Following the consultation, comments will be considered during the development of the DPD. The formal consultation is expected to run from July to August 2014. A Draft SA Report will be produced for the Submission Site Allocations DPD.



Appendix A

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## Review of Plans, Programmes and Policies

Appendix B



Baseline Data

Appendix C

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## Scoping Report Comments



# Appendix D

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## Alternatives

## Sustainability Matrix Area Based Policies

## Sustainability Matrix Site Allocations

## Sustainability Matrix IP-One Policies

## Sustainability Matrix Opportunity Areas