



# Strategic Environmental Assessment and Sustainability Appraisal

Proposed Submission Core Strategy and  
Development Management Policies Document

---

SA Report



Hyder Consulting (UK) Limited

2212959

Firecrest Court  
Centre Park  
Warrington WA1 1RG  
United Kingdom

Tel: +44 (0)1925 800 700

Fax: +44 (0)1925 572 462

www.hyderconsulting.com



## Ipswich Borough Council

# Strategic Environmental Assessment and Sustainability Appraisal

## Proposed Submission Core Strategy and Development Management Policies Document

---

### SA Report

**Author** Kate Burrows

A handwritten signature in black ink, appearing to read "K Burrows", written over a horizontal line.

**Checker** David Hourd

A handwritten signature in black ink, appearing to read "D Hourd", written over a horizontal line.

**Approver** David Hourd

A handwritten signature in black ink, appearing to read "D Hourd", written over a horizontal line.

**Report No** 001-UA006314-01

**Date** 8 December 2014

This report has been prepared for Ipswich Borough Council in accordance with the terms and conditions of appointment for Core Strategy and Development Management Policies Document dated 11 August 2014. Hyder Consulting (UK) Limited (2212959) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.



# CONTENTS

---

ABBREVIATIONS .....	1
1 INTRODUCTION .....	2
1.1 Overview.....	2
1.2 Background to and Purpose of the Core Strategy and SA Report.....	2
1.3 Structure of this SA Report.....	3
2 THE CORE STRATEGY AND POLICIES DPD .....	5
3 SUSTAINABILITY APPRAISAL .....	9
3.1 Stages in the SA Process .....	9
3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope .....	11
3.3 Stage B: Developing and Refining Options and Assessing Effects ....	35
3.4 Stage C: Preparation of the SA Report ( <b>this stage</b> ).....	39
3.5 Stage D: Consultation on the Core Strategy and the SA Report .....	39
3.6 Stage E: Monitoring the significant effects of implementing the DPD .....	40
4 APPRAISAL OF THE CORE STRATEGY AND ALTERNATIVES ....	41
4.1 The Vision.....	41
4.2 Strategic Objectives.....	41
4.3 Core Strategy Policies .....	43
4.4 Development Management Policies .....	53
5 CUMMULATIVE EFFECTS .....	62
6 MONITORING FRAMEWORK .....	65
6.1 Requirements of the SEA Directive .....	65
6.2 Approach .....	65
6.3 Existing Monitoring Programmes.....	66
6.4 Proposed Monitoring Framework.....	66
7 NEXT STEPS .....	73



## Appendices

Appendix A - Review of Plans, Programmes and Environmental Protection Objectives

Appendix B - Baseline Data

Appendix C - Consultation Comments

Appendix D - Sustainability Appraisal Matrices – Core Strategy Policies

Appendix E - Sustainability Appraisal Matrices – Development Management Policies

Appendix F – 2013 Focussed Review Alternative Assessment

*Appendix G (Available upon request) – Extract from Suffolk Coastal District Council - Sustainability Appraisal Scoping Report Site Allocations and Area Specific Policies DPD and Felixstowe Peninsula AAP - November 2014*

*Appendix H (Available upon request) – Extract from Babergh District Council and Mid-Suffolk District Council Development Management Policies and Strategic Site Allocations Joint Sustainability Appraisal – Scoping Report – June 2014*





# 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
ICT	Information and Communication Technology
LDF	Local Development Framework
LNR	Local Nature Reserve
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
SA	Sustainability Appraisal
SAC	Special Area of Protection
SBRC	Suffolk Biodiversity Records Centre
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
PPPs	Plans, Policies, Programmes

# 1 INTRODUCTION

## 1.1 Overview

The overarching strategic framework for development in Ipswich to 2027 is set out within the Core Strategy and Policies Development Plan Document (DPD) which was formally adopted on 14th December 2011.

Following the initiation of a focussed review of the adopted Core Strategy in 2013 (which provided updated housing and employment numbers, along with proposing to bring forward development at the Garden Suburb sooner) it was determined that the extent of changes amounted to a whole plan review. Therefore the emerging Core Strategy and Policies DPD (hereafter referred to as the 'Core Strategy') will eventually replace the current adopted Core Strategy and Policies DPD.

The emerging Core Strategy together with the emerging Site Allocations (incorporating IP-One Area Action Plan) DPD (hereafter referred to as the Site Allocations DPD) will provide the new 'Local Plan' / statutory development plan for Ipswich up to 2031.

As part of the preparation process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) has been undertaken. Hereafter the term SA has been used in this report when referring to the combined SA/SEA process. This report presents the process and findings of the SA of the Core Strategy.

## 1.2 Background to and Purpose of the Core Strategy and SA Report

As previously stated above, the Core Strategy sets out the strategy for future development in Ipswich to 2031. It indicates broadly how and where the borough will accommodate development to meet needs identified through the evidence base. It also explains how it will ensure this is done in a sustainable way. It contains detailed policies to manage development in Ipswich. Proposed development will be assessed against all relevant policies contained within the Core Strategy along with those in the Site Allocations (Incorporating IP-One Area Action Plan) DPD and any other relevant adopted plans.

An SA was undertaken for the Draft Submission Core Strategy and Policies in 2009 by Suffolk County Council and the Core Strategy was subsequently adopted in 2011. In October 2013 Ipswich Borough Council consulted upon the scope of SA for a Focused Review of the adopted Core Strategy. Subsequently an interim SA Report was prepared and consulted upon in January 2014.

In August 2014 it was determined that the extent of the changes in the Core Strategy represented the need for a whole plan review rather than a focussed review. Therefore, a Scoping letter was issued in September 2014 to the three statutory bodies and published on Ipswich Borough Council's website to provide an update to the scope and approach to SA.

A benefit of the Core Strategy whole plan review is that Ipswich Borough Council can now consolidate the general development management (DM) policies into Part C of the Core Strategy rather than including them within the Site Allocations DPD.

Due to the changes outlined above Ipswich Borough Council are revising the SA of the whole Core Strategy to ensure it reflects the latest versions of the Plan. **Therefore this SA Report**

**supersedes the SA of the Core Strategy (which was adopted in December 2011) and the SA of the Core Strategy Focused Review (consulted upon January-March 2014). This SA Report is published for comment alongside the Proposed Submission Core Strategy and Policies DPD.**

This SA Report provides a summary of the SA process so far and presents the findings and recommendations of the assessment of the Core Strategy. **It is essential that the Proposed Submission Core Strategy and Policies DPD is read in conjunction with this SA Report.** A separate SA Report has been produced in relation to the Proposed Submission Site Allocations DPD.

Comments received on the previous SA Report of the Core Strategy during the consultation in early 2014 have been considered in undertaking this SA. Further details are provided in Appendix C.

## 1.3 Structure of this SA Report

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

**Table 1-1 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 Core Strategy and this SA Report.
2: The Core Strategy and Policies DPD	Provides an overview of the contents of the Core Strategy and Policies DPD.
3: 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 Core Strategy (including the SA Framework), together with an overview of the consultation requirements.
4: Appraisal of the Core Strategy and its Alternatives	Presents a summary of the SA of the Core Strategy including its alternatives against the SA Framework. This section also outline any recommendations suggested to improve the sustainability performance of the policies against the SA Framework.
5: Cumulative Effects	Presents a summary of the potential cumulative effects that may arise as a result of the Core Strategy.
6: Monitoring Framework	Provides a draft monitoring framework to monitor identified significant effects identified through the SA.
7: 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	Provides a review of relevant plans programmes and environmental protection objectives.
Appendix B	Provides a summary of the baseline conditions within the borough. It also identified current issues and opportunities.
Appendix C	Outlines a summary of the consultation responses received and how they

Section of SA Report	Outline Content
	were taken on board in the SA.
Appendix D	SA matrices for the Core Strategy policies
Appendix E	SA matrices for the Development Management policies.
Appendix F	2013 Focussed Review Alternative Assessment
<i>Appendix G (available upon request)</i>	<i>Provides an extract of relevant plans, programmes and protection objectives along with baseline data for Suffolk Coastal. Taken from the Suffolk Coastal District Council - Sustainability Appraisal Scoping Report Site Allocations and Area Specific Policies DPD and Felixstowe Peninsula AAP - November 2014</i>
<i>Appendix H (available upon request)</i>	<i>Provides an extract of relevant plans, programmes and protection objectives along with baseline data for Mid Suffolk and Babergh. Taken from the Babergh District Council and Mid-Suffolk District Council Development Management Policies and Strategic Site Allocations Joint Sustainability Appraisal – Scoping Report – June 2014.</i>

## 2 THE CORE STRATEGY AND POLICIES DPD

The Core Strategy and Policies DPD forms part of the Ipswich Local Plan. It covers three areas of policy:

- It sets out a strategic vision and objectives to guide the development of the town;
- It promotes the spatial strategy for the development of the borough to 2031 through strategic policies; and
- It provides a suite of policies to control, manage and guide development across the borough.

The Core Strategy includes a vision, 12 Strategic Objectives, 20 Core Strategy Policies and 29 Development Management Policies. All of which are outlined below:

Our **Vision** is to improve the quality of life, health and well-being for all who live in, work in, learn in and visit Ipswich, by supporting growth and ensuring that development happens in a sustainable manner so that the amenities enjoyed by local people are not harmed and the town is enhanced.

As a result, by 2031 Ipswich will be a more vibrant, active and attractive modern county town successfully combining modern development with conserving and enhancing its historic character - a true focus for Suffolk and beyond. It will be a place where people aspire to live, work, learn, visit and invest - and it will have a reduced carbon footprint. In spatial terms:

- a** There will be more people living and working in Ipswich town centre, which will be the focus for much of the new development including continued development at the Ipswich Waterfront.
- b** People will enjoy an extended and improved shopping centre that includes new stores on allocated sites, providing greater choice than at present, and improved cultural and sporting opportunities within the wider centre.
- c** Pedestrian links between the central shopping area and the Waterfront, Village, Education Quarter and railway station will be direct, attractive, safe and well signed.
- d** Pedestrians, cyclists and public transport users will come first in Ipswich town centre. Traffic management measures in conjunction with improvements for pedestrians, cyclists and buses will ensure effective links between the wider Ipswich area and the town centre, and help keep congestion down and accessibility easy in the centre. Additional short stay parking and enhanced park and ride will provide for car-borne shoppers, visitors and the workforce.
- e** The distinctive network of beautiful parks and open spaces, green infrastructure and open water will be enhanced by the completion of the river path, improved ecological network and additional tree canopy cover and landscaping in new developments surrounding areas and on the streets.
- f** As well as the concentration of jobs in the town centre, there will be new employment development at sites around the Borough including a strategic employment site at Futura Park, together with the continued development of existing employment areas distributed across the town.
- g** University Campus Suffolk will have continued its planned growth, to complete the new campus at the Waterfront and the adjacent Education Quarter.
- h** The town's health will be cared for through strategic health services brought together at the Heath Road Hospital site and a strong network of local surgeries and health centres, including replacement or additional provision for Deben Road surgery.

- i During the plan period, land will start to come forward for development at the Ipswich Garden Suburb, in conjunction with highway, water, energy, education, green and health infrastructure. Express bus services and pedestrian and cycle routes will connect the area to the town centre
- j Outside central Ipswich, thriving district and local centres will provide local shopping and services close to people's homes and will be surrounded by strong and cohesive communities.

The twelve strategic objectives that will guide the Core Strategy include:

- 1 High standards of design will be required in new development. Development must be sustainable, environmentally friendly and resilient to the effects of climate change. Standards of acceptability will be raised progressively from 2006 (Building Regulations) levels for all developments in the town in terms of design and environmental performance.
- 2 Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.
- 3 At least: (a) 13,550 new dwellings shall be provided to meet the needs of Ipswich within the Housing Market Area between 2011 and 2031 in a manner that addresses identified local housing needs and provides a decent home for everyone, with at least 35% at the Ipswich Garden Suburb and 15% in the remainder of the Borough being affordable homes; and (b) in the region of 12,500 additional jobs shall be provided in Ipswich to support growth in the Ipswich Policy Area between 2011 and 2031
- 4 The development of the Borough should be focused primarily within the central Ipswich 'IP-One' area, Ipswich Garden Suburb and within and adjacent to identified district centres.
- 5 Opportunities shall be provided to improve strategic facilities in Ipswich by:
  - Significantly enhancing the town centre in terms of quantity and quality of the shops, the cultural offer and the network of public spaces;
  - Ensuring a new strategic employment site at Futura Park continues to be developed;
  - Extending the strategic greenspace, ecological network and canopy cover; and
  - Continuing to support the development of University Campus Suffolk and Suffolk New College.
- 6 To improve accessibility to and the convenience of all forms of transport, and achieve significant modal shift from the car to more sustainable modes through Travel Ipswich and other local initiatives. This will: (a) promote choice and better health; (b) facilitate sustainable growth, development and regeneration; (c) improve integration, accessibility and connectivity; and (d) promote green infrastructure as alternative 'green' non-vehicular access around the town and urban greening of existing routes. Specifically:
  - Significant improvements should take place to the accessibility to and between the three key nodes of: the railway station (including the wider Ipswich Village environment), the Waterfront (and particularly the Education Quarter) and the Central Shopping Area;
  - Additional east-west highway capacity could be provided within the plan period in the Ipswich area to meet the needs of the wider population and to provide the potential to reallocate some central road space;
  - Comprehensive cycle routes should be provided; and
  - Ipswich Borough Council aspires to an enhanced public transport system.
- 7 Enhanced flood protection including a tidal surge barrier to be in place to protect the town's existing and expanding communities from the threat of tidal flooding.

- 8** To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use, and conserve and enhance the historic environment and landscape character of Ipswich, including historic buildings, archaeology and townscape.
- 9** To retain and provide high quality schools, health facilities, sports and cultural facilities and other key elements of community infrastructure in locations accessible by sustainable means and in time to meet the demands put on such services from the town's growth and ageing population.
- 10** To tackle deprivation and inequalities across the town.
- 11** To improve air quality and create a safer, greener, more cohesive town.
- 12** To work with other local authorities in the Ipswich Policy Area and with community partners to ensure a co-ordinated approach to planning and development.

The 20 Core Strategy Policies include:

- Policy CS1: Sustainable Development - Climate Change
- Policy CS2: The Location and Nature of Development
- Policy CS3: IP-One Area Action Plan
- Policy CS4: Protecting our Assets
- Policy CS5: Improving Accessibility
- Policy CS6: The Ipswich Policy Area
- Policy CS7: The Amount of New Housing Required
- Policy CS8: Housing Type and Tenure
- Policy CS9: Previously Developed Land
- Policy CS10: Ipswich Garden Suburb
- Policy CS11: Gypsy and Traveller Accommodation
- Policy CS12: Affordable Housing
- Policy CS13: Planning for Jobs Growth
- Policy CS14: Retail Development and Main Town Centre Uses
- Policy CS15: Education Provision
- Policy CS16: Green Infrastructure, Sport and Recreation
- Policy CS17: Delivering Infrastructure
- Policy CS18: Strategic Flood Defence
- Policy CS19: Provision of Health Services
- Policy CS20: Key Transport Proposals

The 29 Development Management Policies include:

- Policy DM1: Sustainable Design and Construction
- Policy DM2: Decentralised Renewable or Low Carbon Energy
- Policy DM3: Provision of Private Outdoor Amenity Space in New and Existing Developments
- Policy DM4: Development and Flood Risk

- Policy DM5: Design and Character
- Policy DM6: Tall Buildings
- Policy DM8: Heritage Assets and Conservation
- Policy DM9: Buildings of Townscape Interest
- Policy DM10: Protection of Trees and Hedgerows
- Policy DM12: Extensions to Dwellinghouses and Provision of Ancillary Buildings
- Policy DM13: Small Scale Infill and Backland Residential Development
- Policy DM14: The Subdivision of Family Dwellings
- Policy DM17: Transport and Access in New Developments
- Policy DM18: Car and Cycle Parking
- Policy DM20: The Central Shopping Area
- Policy DM21: District and Local Centres
- Policy DM22: Town Centre Uses Outside the Central Shopping Area
- Policy DM23: Retail Proposals outside Defined Centres
- Policy DM24: Affordable Housing
- Policy DM25: Protection of Employment Land
- Policy DM26: Protection of Amenity
- Policy DM27: Non-residential Uses in Residential Areas
- Policy DM28: Protection of Open Spaces, Sport and Recreation Facilities
- Policy DM29: Provision of New Open Spaces, Sport and Recreation Facilities
- Policy DM30: The Density of Residential Development
- Policy DM31: The Natural Environment
- Policy DM32: Protection and Provision of Community Facilities
- Policy DM33: Green Corridors
- Policy DM34: Countryside

The Core Strategy also includes two non-policy based areas. Firstly a section on the context to the whole document which explains, amongst other things, the planning system, the New Anglia Local Enterprise Partnership, the Duty to Co-operate, and an explanation as to how all Ipswich's planning documents fit together. It also paints a picture of Ipswich in terms of its geography, history and character and provides some facts about Ipswich as a place (Part A). Secondly, there is a section on implementation, targets and monitoring proposals (Part D).



# 3 SUSTAINABILITY APPRAISAL

## 3.1 Stages in the SA Process

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 Core Strategy have been appraised using SA Objectives (Table 3-2 provides further detail)<sup>1</sup>.

Table 3-1 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 3-1 Stages in the SA Process and SEA Directive Requirements**

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Core Strategy
<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 and subsequent Scoping Letter that was consulted upon in October / November 2013 and September 2014 respectively.  During these stages the scope of the SA for the Core Strategy was defined.
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	
A3: Identifying sustainability issues and problems		Chapter 2	
A4: Developing the SA Framework	N/A	Chapter 2	
A5: Consulting on	<i>The authorities referred to in Article 6(3) shall be consulted</i>	N/A	

<sup>1</sup> Planning Practice Guidance ‘Strategic environmental assessment and sustainability appraisal’ 2014 and [www.pas.gov.uk](http://www.pas.gov.uk)

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Core Strategy
the scope of the SA	<i>when deciding on the scope and level of detail of the information which must be included in the environmental report.(Article 5.4)</i>		
<b>Stage B: Developing and Refining Options and Assessing Effects</b>			
B1: Testing the Core Strategy'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))	Chapter 3	Stage B of the SEA process is linked to the overall production of the Core Strategy which includes the development of plan options and the selection of the preferred options.  There has been a considerable degree of interaction between the plan-making and SA teams during this stage in the process. This has enabled potential adverse effects of the Core Strategy to be avoided/minimised and potential sustainability benefits maximised. A separate Annex has been produced by Ipswich Borough Council which explains how the mitigation measures identified have been addressed in the Core Strategy.
B2: Developing the Core Strategy 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 Core Strategy			
B4: Evaluating the effects of the Core Strategy			
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 monitor the significant effects of implementing the Core Strategy	<i>The Environmental Report should provide information on "a description of the measures envisaged concerning 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 SA Report represents the required Stage C output.	The SA Report will be produced in line with the requirements of the SEA Directive for producing an Environmental Report. A Non-Technical Summary is also provided.
<b>Stage D: Consultation on the Core Strategy and the SA Report</b>			
D1: Public	Article 6 contains the requirements for the draft plan or		The SA Report and the Core

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Core Strategy
participation on the proposed submission documents	programme and the environmental report to be made available to statutory authorities and the public. They should be given an 'early and effective opportunity within time frames to express their opinions' (Article 6.2).		Strategy will be consulted upon in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) 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 Core Strategy. It will be essential for the SA Report and the Strategy to remain consistent.
D3: Making decisions and providing information			
<b>Stage E: Monitoring the significant effects of implementing the Core Strategy</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			

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 Core Strategy, and the technical limitations to the appraisal.

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

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

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))*

A review of other plans and programmes that may affect the preparation of the Core Strategy has been undertaken in order to contribute to the development of both the SA and the 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 Core Strategy.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the Core Strategy.

The review included documents prepared at international, national, regional and local scale (within Ipswich). As part of the SA process consideration has also been given to plans relevant to local authority areas adjoining Ipswich due to the potential implications of the Core Strategy in relation to adjoining areas (particularly relevant to Policies CS2 and CS7 discussed later in this SA Report). This also reflects guidance contained in the Planning Practice Guidance which states '*The area likely to be affected may lie outside the local planning authority boundary and plan makers may need to obtain information from other local planning authorities.*'<sup>2</sup> The latest Scoping Report produced for Suffolk Coastal is available at <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/review/sustainability-appraisal/> and for Mid Suffolk and Babergh is available at <http://www.midsuffolk.gov.uk/assets/UploadsMSDC/Economy/Strategic-Planning-Policy/LDF/DPDs/Dm-Allocations-SEA-SR.pdf> . A PDF of these documents can be provided upon request as Appendices G and H of this report.

## International Plans and Programmes

A review was undertaken of key International Conventions and European Directives that could potentially influence the development of the Core Strategy 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

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>3</sup> which outlines the over-arching Government objective to raise the quality of life in our communities.

Central Government establishes the broad planning guidelines and policies for a variety of different topics which are now brought together in the National Planning Policy Framework

---

<sup>2</sup> Reference ID: 11-016-20140306

<sup>3</sup> UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)

(NPPF). The NPPF streamlines former national planning policy into a consolidated set of priorities to consider when planning for and deciding on new development.

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.

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 Level Plans

A wealth of different plans and strategies have been produced at the regional (East Anglia/East of England) and county (Suffolk) 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 some of these plans and strategies may be outside the remit of the Core Strategy which forms only an individual part of a number of different vehicles trying to deliver regional and sub- regional targets.

The Localism Act was granted Royal Assent on 15th November 2011. This Act seeks to rescind some regional planning documents, and as such, the East of England Plan (Regional Spatial Strategy) (2008) has been revoked.

## Local Policy

Plans produced at the local level specifically address issues relating to the economy; health; safety; tourism; sustainable communities; housing; employment; and physical activity. The Core

Strategy and the SA should draw from these documents and transpose their aims in their policies and proposals. 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 Borough. It is, through identifying these themes and incorporating them into the DPD that synergies can be achieved with other relevant documents.

## Key Results from the Review

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 Areas of Conservation (SACs), 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.

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.

### 3.2.2 The Sustainability Baseline and Key Sustainability Issues

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

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 Core Strategy where relevant.

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

- Review of relevant local, regional and national plans, strategies and programmes;

- Data research based around 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 was also based on advice in Planning Practice Guidance 'Strategic environmental assessment and sustainability appraisal' 2014, [www.pas.gov.uk](http://www.pas.gov.uk) guidance and previous consultation recommendations from other SAs. 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. The baseline data gathered for SA purposes for plans relating to Babergh, Mid-Suffolk and Suffolk Coastal authority areas has also been considered as part of the SA process. As with the review of relevant plans and programmes this is particularly relevant to policies CS2 and CS7, as discussed later in this report. This also reflects guidance contained in the Planning Practice Guidance which states 'The area likely to be affected may lie outside the local planning authority boundary and plan makers may need to obtain information from other local planning authorities.'<sup>4</sup>,

A detailed description of the baseline characteristics of Ipswich is provided in Appendix B. The latest Scoping Report produced for Suffolk Coastal is available at <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/review/sustainability-appraisal/> and for Mid Suffolk and Babergh is available at <http://www.midsuffolk.gov.uk/assets/UploadsMSDC/Economy/Strategic-Planning-Policy/LDF/DPDs/Dm-Allocations-SEA-SR.pdf>. A PDF of these documents can be provided upon request as Appendices G and H of this report.

## Key Sustainability Issues and Opportunities

Baseline data has been used to identify the key sustainability issues and opportunities in Ipswich and the adjacent authorities. Issues and opportunities are presented in Table 3-2. Although issues / opportunities have been grouped by broad sustainability theme, many are indirectly or directly linked and therefore closely related.

---

<sup>4</sup> Reference ID: 11-016-20140306



**Table 3-2 Summary of Key Sustainability Issues and Opportunities**

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Population	<p>Ipswich has the highest population of all the districts 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.</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 is a need to improve educational attainment in the Borough. By improving levels of educational attainment there could be wider social benefits and improvements to the local economy.</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. 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 through the provision of new homes as there are links between the supply of decent housing and health.</p> <p>Health improvements would also benefit the local economy and would enhance overall quality of life in the Borough.</p> <p>Opportunities should also be sought to encourage walking and cycling.</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 the area is classed as being in 'severe water stress'. 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>New developments and households within the Borough should be encouraged to minimise water use and to re-use rainwater where possible i.e. grey water recycling systems. Discussions regarding water resources availability for new developments should be undertaken with Anglian Water.</p> <p>Areas at risk from flooding should be protected from development that would increase that risk. New development should be encouraged to use Sustainable Drainage Systems (SuDS) to manage runoff, further reduce flood risk and help protect groundwater and surface water quality.</p> <p>It should be ensured that groundwater quality is protected particularly during any construction works.</p>
Soil and Land Quality	<p>Much of Ipswich is an urban built up environment. There is some known potentially contaminated land within the Borough.</p> <p>In 2011/12, there was 67.2 hectares vacant or derelict land. (141.8 hectares total including sites in use, allocated or with planning permission) (Ipswich National Land Use database 2014).</p>	<p>Opportunities should be sought to include allotment space within the Borough where possible.</p> <p>Where appropriate, opportunities should be sought to implement appropriate remediation and verification measures of contaminated land.</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.</p> <p>The air quality impacts of additional traffic within Ipswich on the AQMAs and other areas of high NO<sub>2</sub> levels must be assessed and monitored and strategies for limiting adverse impacts on air quality identified.</p>
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.</p>	<p>New development should be encouraged to use SuDS to manage runoff and further reduce flood risk (particularly as some new development would be situated on previously undeveloped land). Delivery of the Ipswich tidal flood defences will also help to reduce flood risk.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
	<p>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 2017 (Environment Agency).</p> <p>In 2011, the estimate of CO<sub>2</sub> emissions for Ipswich was 4.2 tonnes per capita (Dept of Energy &amp; Climate Change, 2011 data). When compared with CO<sub>2</sub> emissions per capita for Suffolk in 2009, Ipswich performed better (see Appendix B).</p> <p>There were no applications for renewable energy developments in 2013/14 (Ipswich Borough Council, 2014).</p>	<p>New developments should be encouraged to include sustainable design principles, energy efficiency and the incorporation of renewables e.g. the inclusion of solar panels and low carbon technologies. The carbon footprint of new development should be reduced.</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).</p> <p>Opportunities should be sought to develop and enhance the network of public open space.</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*. 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 Historic Environment Record.</p>	<p>It is important to ensure that the cultural heritage is protected and that cultural heritage issues are taken into consideration.</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 it is important to maintain the gap between Ipswich and adjacent villages to preserve local distinctiveness.</p> <p>Opportunities should be sought to promote local character and distinctiveness where possible to encourage new residents.</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 now operational at Great Blakenham (Masons Quarry) which lies approximately 3km north of the Borough boundary, therefore transport implications must be managed carefully.</p> <p>In 2012/13 40.8% of waste in Ipswich was recycled and composted (Ipswich Borough Council, September 2014). Reuse / recycling / composting rates were lower than those recorded for Suffolk, the East of England and England between 2008 and 2012.</p>	<p>Opportunities should be sought to enhance recycling and composting performance.</p> <p>Sustainable sourcing and waste management principles should be promoted for all new development within Ipswich.</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>Opportunities should be sought to reduce dependence on the private car and increase public transport use.</p> <p>It will be important to ensure that new development can be easily accessed by public transport.</p> <p>The cycling and walking network within the Borough should be expanded and enhanced.</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>The economy in Ipswich needs to be diversified to broaden the economic base as the key economic sectors are identified primarily in the service sector, e.g. distribution, public administration, etc.</p> <p>The good transport links in the Borough should be exploited as accessibility is a key issue when encouraging new residents.</p> <p>There is a need to retain skilled workers and improve skills levels amongst the workforce.</p> <p>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, and a focus on stalled developments.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
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. However, recorded crimes per 1000 of Ipswich's population have fallen from 106 in 2008-2009 to 77 in 2013-2014.</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>
Housing	<p>Housing costs are relatively low but have gradually increased in recent years.</p> <p>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>96 dwellings (net) were completed between 1st April 2012 and 31st March 2013, 7 of which were affordable housing completions (7.3%). 59 of these dwellings were on previously developed land (61.5%) and 17 were within the central IP-One area (17.7%). Gross housing completions (before calculating those dwellings lost) were 111 (AMR 2012-2013).</p> <p>The number of housing completions has fallen from a peak in 2007/08 as a result of the recession and lower demand for flats in this period. Completions for 2012/13 were at the lowest level in Ipswich since 1998/99 when 60 dwellings were completed. Affordable housing completions vary from year to year influenced by the availability of funding available and Ipswich Borough Council has commenced a programme of affordable house</p>	<p>Housing regeneration efforts present a significant opportunity both to revitalise the housing stock, address deprivation and to improve quality of life.</p> <p>Development within the Borough provides opportunities to meet housing needs, particularly for family housing and to counter balance the provision of flats within Ipswich town centre.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
	<p>building across the borough with 108 dwellings to be built on a site at Bader Close in east Ipswich in addition to 7 dwellings completed on Coltsfoot Road and Whitton Church Lane. The Council's adopted Core Strategy (2011) 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>There are 972 vacant homes in Ipswich (2014), a decrease from 1,750 in 2011/12. 2.9% of all dwellings in Ipswich were vacant in 2011/12, representing a decrease from 3.3% in 2010/11. This figure is slightly lower than the Suffolk and England average although slightly higher than the East of England average.</p>	

### 3.2.3 The SA Framework

#### Background to the SA Framework

The SA Framework underpins the assessment methodology and comprises a series of SA 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 SA Objectives, they are a recognised tool for undertaking the assessment and are aspirations/goals that an authority/organisation should work towards achieving.

The SA Objectives are separate from the Core Strategy 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 SA Objectives

The SA 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 Core Strategy. Twenty two SA Objectives were identified and the assessment showed that their compatibility with the twelve plan objectives was high with every sustainability objective having at least one plan objective positively compatible.

The SA Objectives have since been reviewed and modified to reflect the requirements of the new Core Strategy. Original SA Objectives ET8 and ET11 have since been merged, therefore there are 21 SA Objectives.

Table 3-3 presents the SA Objectives that were used in the assessment of the Core Strategy and its alternatives. Each of the SA Objectives is supported by a series of 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 3-3 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>	ET1a. Number and distribution of AQMAs ET1b. Exceedances of the annual average objective level for Nitrogen Dioxide in the AQMAs	Air Quality Archive Ipswich Borough Council
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>	ET2a. Area of contaminated land returned to beneficial use ET2b. Density of new development ET2c. Amount (ha) of previously developed land available	Ipswich Borough Council Office for National Statistics (ONS) Department for Communities and Local Government
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>	ET3a. Tonnage of household waste produced and recycled ET3b. Location and number of waste facilities serving the Borough ET3c. Amount of household waste collected per household	Defra Suffolk County Council

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>	ET4a. Traffic volumes, access to local services and journeys taken by sustainable modes ET4b. Journey to work by mode	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>	ET5a. Proportion of new developments with access to key services by walking, cycling and public transport ET5b. Number of LSOAs with wards in bottom 10% of most deprived in terms of barriers to housing and services provision	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>	ET6a. Total CO <sub>2</sub> emissions for the Borough ET6b. Annual average domestic gas and electricity consumption ET6c. Provision of shading and greening (i.e. avoiding the heat island effect)	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>	ET7a. Water quality in rivers and groundwater quality ET7b. Daily domestic water use (per capita consumption, litres) ET7c. Number of planning applications granted permission contrary to Environment Agency advice	The Environment Agency Suffolk County Council Ipswich Borough Council
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>	ET8a. Area (ha) of woodland ET8b. Extent and condition of key habitats for which Biodiversity Action Plans have been established 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 ET8d. Percentage of designated sites in favourable condition	<a href="http://www.magic.gov.uk">www.magic.gov.uk</a> Suffolk Biodiversity Action Plan Natural England GeoSuffolk website SBRC
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 heritage assets and their setting?</li> <li>▪ Would the policy contribute to the protection and enhancement of historic landscape / townscape value?</li> </ul>	ET9a. Number of heritage assets 'at risk' ET9b. Number of listed buildings reviewed annually for condition, repair and 'at risk' status.	English Heritage Ipswich Borough Council

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>	HW1a. Proportion of population with access to hospital / GP / Dentist HW1b. Proportion of journeys to work by foot or by bicycle HW1c. How children travel to school (Quality of Life Indicators (Government indicators) / Best Value Performance Indicators (Ipswich Borough Council)) HW1d. Levels of physical activity data HW1e. Number of GP registrations for depression	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>	HW2a. Play and open space quality, quantity and accessibility HW2b. Percentage of residents who are happy with their neighbourhood as a place to live (Place Survey) HW2c. Number of noise and light pollution complaints	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> <li>Would the proposals benefit LSOAs that exhibit high levels of deprivation?</li> </ul>	ER1a. Proportion of population who live in wards that rank within the 10% most deprived in the country ER1b. Provision of childcare	<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>	ER2a. Working age unemployment ER2b. Employment by occupation ER2c. Youth unemployment data ER2d. Long term unemployment data ER2e. Average wage data	ONS / National Online Manpower Information System (NOMIS) Ipswich Borough Council <a href="http://www.communities.gov.uk">www.communities.gov.uk</a>
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>	ER3a. Number of new dwellings completed in Ipswich including affordable housing ER3b. Percentage split of dwelling types ER3c. Average house price ER3d. Number of people presenting themselves as homeless.	Suffolk Observatory ONS Ipswich Borough Council
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>	ER4a. Planning consents for employment uses ER4b Take up of employment land ER4c Population in Employment	Ipswich Borough Council (Monitoring reports) ONS – Nomis <a href="http://www.nomisweb.co.uk">www.nomisweb.co.uk</a>

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>	ER5a. No. / Percentage of vacant retail units ER5b. Commercial / retail rental data ER5c. Percentage of new retail floorspace developed within defined centres.	Ipswich Borough Council <a href="http://www.communities.gov.uk">www.communities.gov.uk</a>
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>	ER6a. No. / percentage of people working from home ER6b. Waiting times at junctions in Ipswich See also ET4a (employment land take up) and HW1b (journey to work)	Ipswich Borough Council Suffolk County Council
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>	ER7a. Business start-ups and closures ER7b. No. of business enquiries to Ipswich Borough Council / Suffolk County Council by types and size of site ER7c. Employment land availability	Ipswich Borough Council Suffolk County Council

SA Objective			SA Indicator	Source
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>	CL1a. GCSE Attainment Levels (Grades A*-C) CL1b. Proportion of the population with no qualifications	ONS <a href="http://www.communities.gov.uk">www.communities.gov.uk</a>
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>	CD1a. Recorded crime per 1,000 population CD1b. Burglary Rate CD1c. Fear of Crime (Quality of Life, Suffolk Speaks, British Crime Survey) CD1d. Number of domestic noise complaints	ONS <a href="http://www.communities.gov.uk">www.communities.gov.uk</a> Ipswich Borough Council

### 3.2.4 Internal SA Objective Compatibility

The 21 SA Objectives have been tested against each other to identify any potential areas of internal incompatibility. The results are presented in Table 3-4 and summarised below.

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 including favourable conditions on SSSIs, SPAs and SACs'
- ET9: 'To conserve and where appropriate enhance areas and sites of historical importance'
- ET10: 'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes'

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.

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.

However, some of these uncertainties could be addressed through the DPD, by requiring developments to meet various standards e.g. Code for Sustainable Homes standards, promoting sustainable travel, and including measures to protect and enhance biodiversity. Table 3-4 uses the notations outlined below.

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



Table 3-4 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	+			

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

## 3.2.5 SA Scoping Report Consultation

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: 5001-UA006314-UE31-01). The Scoping Report was in two parts – Part One covered the Core Strategy and Part Two, the Site Allocations DPD. The Scoping Report was issued to the Statutory Consultees, Natural England, English Heritage and the Environment Agency in October 2013 for comment. It was also published on the Councils website.

Following the identified need for a whole plan review rather than a focussed review of the Core Strategy a Scoping Letter was issued to Statutory Consultees and published on the Council's website in September 2014. The Scoping Letter provided an update to the change in scope since the 2013 Scoping Report.

Representations received have been addressed and taken on board in this SA Report. Representations received from the Scoping Letter along with how they were addressed are provided in Appendix C.

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

### 3.3.1 Alternatives

As identified in Box 3, the SEA Directive requires that the assessment process considers alternatives:

#### **Box 3: Consideration of Alternatives**

*“..an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated” (2001/42/EC) (Article 5.1).*

The Practical Guide advises that only realistic and relevant alternatives should be considered and they should be sufficiently distinct to enable a meaningful comparison of their different environmental effects.

### Identification of Reasonable Alternatives

#### **Amount of Housing**

The alternative scenarios for housing requirement projections are set out in the Topic Paper: Reviewing the Ipswich Housing Figures (January 2014) and relate to identifying a robust and realistic forecast of the likely number of new dwellings required. Alternative scenarios were investigated to apply different assumptions in relation to population change. These scenarios were Trend Migration, Low Migration, Household Constrained and East of England Forecasting Model. The Topic Paper outlines why the Trend Migration scenario is the most suitable to apply in determining the objectively assessed housing need for Ipswich Borough.

It is not appropriate to assess these scenarios through the SA process as their purpose is to arrive at the most likely nature and scale of future population change within the Borough. Identifying the likely sustainability effects of the different scenarios would not assist in this process of identifying need and therefore these alternatives are not intended to not be viewed in the same manner as alternative strategies identified as part of the SA process. This is reflected

in the Planning Practice Guidance which states ‘*The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.*’<sup>5</sup>

It should also be noted that a ‘no plan’ option i.e. continuation of the adopted CS2 has not been assessed as it is not considered to be a reasonable alternative (housing need has been updated).

### **Strategic Spatial Alternatives**

The Topic Paper: Reviewing the Ipswich Housing Figures (January 2014) identified two alternative strategies for meeting the objectively assessed housing need.

Alternative strategy 1 in the Housing Topic Paper considers the potential for securing higher density development on housing sites to deliver a higher number of homes. Whilst it was concluded that this is unlikely to be deliverable at present due to economic conditions, this option could represent a realistic alternative in the longer term should economic conditions change. It would be an alternative to the proposed wording of policies CS2 and CS7 which states that the council will work with neighbouring local authorities to address housing need later in the plan period.

For the purposes of undertaking the SA, the residual need (minus windfalls) that would need to be met in neighbouring local authority areas is around 4,000 dwellings.

Alternative strategy 2 in the Housing Topic Paper put forward a further alternative whereby a greater amount of housing would be delivered outside of the Borough whilst the development at the Garden Suburb would reduce from 3,500 to 1,500. The development of the Garden Suburb is intended to come forward during the earlier stages of the plan period in acknowledgement that the release of all phases is necessary to secure the required infrastructure. It is not possible to instead rely on delivery in neighbouring local authority areas during this time as their currently adopted Core Strategies do not incorporate provision for meeting Ipswich’s shortfall – this is an issue that would need to be addressed in the medium to long term through joint working between Ipswich Borough Council and the adjoining authorities. The conclusion that this alternative is not realistic therefore remains.

Consideration has also been given to the potential to release employment sites which have been allocated for some time but not been developed. However, of the two sites to which this applies one (IP147) is understood to be coming forward shortly and the other (made up of IP058, IP067 and IP099) is located adjacent to a sewage works and therefore not suitable for residential use. This option is therefore not considered to be realistic.

The development of sites identified in the SHLAA and the development of smaller sites (such as appropriate back gardens) is accounted for within the windfall figure at rates consistent with past delivery and the availability of deliverable sites (the latter of which has been assessed through the SHLAA). It is therefore not realistic to include an alternative which would see a greater amount of development from such sites.

---

<sup>5</sup> Reference ID: 2a-004-20140306

In conclusion only alternative strategy 1 has been considered to be reasonable and is appraised in Section 4 and Appendix D as an alternative to the spatial strategy set out in CS2. The assessment of the alternative is appraised alongside proposed CS2 with commentary stating whether the alternative performs better or worse.

#### **Policy Alternatives and Evolution**

The Core Strategy and Development Management Policies have evolved since the 2011 Core Strategy and again since the 2013 Focussed Review<sup>6</sup>. Where significant changes have occurred, a commentary on the relative sustainability effects of these changes (and in effect alternative policy) is provided in Section 4 and Appendices D, E and F. It also considers the effects of not producing a policy in each case (NB for the Development Management Policies and some Core Strategy Policies this relates to the assessment undertaken in 2009).

### **3.3.2 Assessment of the Vision**

Good practice guidance recommends that the key aims and principles of the plan should be assessed against the SA Objectives, in order to test their compatibility and to determine whether they accord with broad sustainability principles.

The Vision for the Core Strategy has been reviewed against the SA Objectives, and a summary of the key strengths, weaknesses and recommendations have been identified (as presented in Section 4.1). Recommendations were made to offset or alleviate any adverse impacts that were predicted, or to enhance any opportunities that were identified.

### **3.3.3 Assessment of the Strategic Objectives**

Good practice guidance also recommends that the goals of a plan should be assessed against the SA Objectives.

The assessment of the twelve Strategic Objectives of the Core Strategy against the SA Objectives has been undertaken using a matrix based approach to determine their compatibility. Recommendations were suggested to offset or alleviate any potential sustainability conflicts between the Strategic Objectives and the SA Objectives. The assessment is presented in Section 4.2.

### **3.3.4 Appraisal of the Core Strategy Policies**

The 20 Core Strategy Policies provide the strategic spatial approach to the development of Ipswich with ensuring the essential components 'live, work and play' are provided for. Infrastructure policies are also included as they support growth and development. The strategic spatial approach outlines the type, quantity and distribution of new development to 2031.

The Core Strategy Policies have been assessed in relevant groups against the SA Objectives to enable the identification of key strengths and weaknesses, and any potential areas for improvement. Mitigation measures and recommendations are suggested where relevant to offset or alleviate any predicted adverse impacts, or to enhance any opportunities that have been identified.

---

<sup>6</sup> Assessments were only undertaken in the 2013 SA where there were judged to be significant differences between the adopted plan and the focused review draft policy.

The assessment of the Core Strategy Policies has been undertaken using a matrix based approach. The assessment notations used in the assessment, together with their definition (i.e. how a positive score was assigned) are presented in Tables 3-5 and 3-6. When undertaking the assessment, the symbols assigned in the matrix were justified in the commentary box along with any uncertainties.

**Table 3-5 Notations used in the SA**

Major Positive Impact	The policy strongly supports the achievement of the SA Objective.	++
Positive Impact	The policy partially supports the achievement of the SA Objective.	+
Neutral/ No Impact	There is no clear relationship between the policy and / or the achievement of the SA Objective or the relationship is negligible.	0
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.	+/-
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.	?
Negative Impact	The policy partially detracts from the achievement of the SA Objective.	-
Major Negative Impact	The policy strongly detracts from the achievement of the SA Objective.	--

**Table 3-6 Temporal scale, Permanency and Certainty used in the SA**

Long Term	Effects likely to arise in 10-25 years of Core Strategy implementation
Medium Term	Effects likely to arise in 5-10 years of Core Strategy implementation
Short Term	Effects likely to arise in 0-5 years of Core Strategy implementation
Direct	Direct effects.
Indirect	Indirect effects.
Reversible	Effects are reversible
Irreversible	Effects are irreversible
High/Medium/Low	High, medium or low certainty of prediction
Cumulative	Potential to have cumulative effect with other proposals or plans on this objective

the assessment of the Core Strategy Policies is provided in Section 4.3. The complete results of the assessment are presented in Appendix D.

### 3.3.5 Appraisal of the Development Management Policies

The Core Strategy contains 29 Development Management Policies designed to support the Core Strategy Policies and manage development in the borough.

The Development Management Policies have been assessed in groups against the SA Objectives using the technique described above for the assessment of the Core Strategy Policies. A summary of the assessment of the Development Management Policies is provided in Section 4.4. The complete results of the assessment are presented in Appendix E.

### 3.3.6 Appraisal of Cumulative and Synergistic Effects

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 offers the following interpretation of 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.*

All elements of the Core Strategy were taken into account within the cumulative assessment along with combined impacts as a result of other initiatives proposed within the borough. Cumulative and Secondary effects have been included in the SA where appropriate and Section 5 provides detail.

### 3.3.7 Appraisal of Transboundary Effects

The SEA Directive requires SAs to consider the transboundary effects of the plan on other EU member states. However, it is not considered likely that the Core Strategy could have significant effects upon other member states. Transboundary effects are mentioned within the SA where considered appropriate.

## 3.4 Stage C: Preparation of the SA Report (this stage)

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

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

This SA Report has now been issued for consultation alongside the Core Strategy Focused Review to all key stakeholders (including statutory consultees and the public) for comment under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulation 2012. The consultation period will run from the 12th December 2014 to 5th March 2015. Following the close of the consultation period, Ipswich Borough Council intends to submit the Core Strategy and the SA for Examination. Any comments made in relation to the SA report will also be submitted as part of this process.

## 3.6 Stage E: Monitoring the significant effects of implementing the DPD

The activities relevant to monitoring that are stipulated in the SEA Directive are outlined below.

*“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” (Article 10.1).*

The Environmental Report should provide information on *“a description of the measures envisaged concerning monitoring”* (Annex I (i)).

Based on the assessment conducted on the options and identification of potential significant environmental effects, a draft monitoring framework has been prepared and is presented in Section 6 of this report.



# 4 APPRAISAL OF THE CORE STRATEGY AND ALTERNATIVES

## 4.1 The Vision

The vision is outlined in Section 2.

### 4.1.1 Sustainability Comments

A key theme of the vision is to promote and enhance sustainable transport within Ipswich. Due to the constrained nature of the Borough and the presence of four AQMAs this is a key issue that potentially could restrict growth. However, the vision seeks to implement traffic management measures in conjunction with improvements for pedestrians, cyclists and buses which will ensure effective links between Ipswich, the wider area and the town centre and contribute to keeping congestion down. All of which would benefit the SA Objectives related to air quality (ET1), climate change (ET6) and traffic movements (ET4).

With regards to the natural environment the vision seeks to ensure the Borough's network of beautiful parks, open spaces green infrastructure and open water is enhanced by new development along with ensuring the historic character of the borough is conserved and enhanced. This would particularly benefit SA Objectives ET8 '*To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs*' and ET9 '*To conserve and enhance the historic environment, heritage assets and their settings*'

There is an emphasis placed upon the need to create a place 'where people aspire to live, work, learn, visit and invest' which would positively fulfil the social SA Objectives, as creating such a place would include improving housing, community and tourist facilities, employment opportunities, educational provision and would facilitate general regeneration.

The economic SA Objectives would be met through the vision's commitment to providing a concentration of accessible job opportunities within the town centre along with ensuring opportunities are created elsewhere including Futura Park. Providing employment opportunities along with housing provision would seek to promote sustainable economic growth.

### 4.1.2 Recommendations and Mitigation Potential

No recommendations or mitigation are proposed.

## 4.2 Strategic Objectives

The Core Strategy contains 12 Strategic Objectives to deliver the vision. The Strategic Objectives are presented on Section 2. Table 4-1 presents the compatibility of the Core Strategy Strategic Objectives against the SA Objectives.

Table 4-1 Compatibility of the SA Objectives and the Strategic Objectives

SA Objectives	Strategic Objectives											
	1	2	3	4	5	6	7	8	9	10	11	12
ET1. To improve air quality	✓	0	✗	✓	✓	?	0	✓	✓	0	0	0
ET2. To conserve soil resources and quality	✓	0	✓	0	✓	0	0	✓	0	0	0	0
ET3. To reduce waste	✓	0	✗	0	✓	0	0	0	0	0	0	0
ET4. To reduce the effects of traffic upon the environment	✓	0	✗	✓	0	?	0	0	✓	0	0	✓
ET5. To improve access to key services for all sectors of the population	✓	0	✓	✓	0	✓	0	0	✓	✓	0	0
ET6. To limit and adapt to climate change	✓	✓	✗	0	✓	0	0	0	0	0	0	0
ET7. To protect and enhance the quality of water features and resources and reduce the risk of flooding	✓	✓	0	0	✓	0	✓	0	0	0	0	0
ET8. To conserve and enhance biodiversity and geodiversity , including favourable conditions on SSSIs, SPAs and SACs	✓	0	✗	0	✓	0	0	✓	0	0	0	✓
ET9. To conserve and enhance the historic environment, heritage assets and their settings	✓	0	✓	0	✓	0	0	0	0	0	0	✓
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	✓	0	✓	0	✓	0	0	✓	0	0	0	✓
HW1. To improve the health of those most in need	✓	0	0	0	✓	✓	0	✓	✓	✓	0	0
HW2. To improve the quality of life where people live and encourage community participation	✓	0	0	0	✓	✓	0	✓	✓	✓	✓	0
ER1. To reduce poverty and social exclusion	0	0	✓	0	✓	✓	0	✓	✓	✓	✓	0
ER2. To offer everybody the opportunity for rewarding and satisfying employment	✓	✓	✓	0	✓	0	0	0	0	✓	0	✓
ER3. To help meet the housing requirements for the whole community	✓	✓	✓	0	0	✓	✓	0	0	0	0	✓
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	✓	✓	✓	0	✓	✓	✓	0	0	0	0	✓
ER5. To support vital and viable town, district and local centres	✓	0	✓	✓	✓	✓	✓	0	0	0	0	✓
ER6. To encourage efficient patterns of movement in support of economic growth	✓	✓	0	✓	0	?	0	0	✓	0	0	✓
ER7. To encourage and accommodate both indigenous and inward investment	0	0	0	0	✓	✓	✓	0	0	0	0	✓
CL1. To maintain and improve access to education and skills for both young people and adults	0	✓	0	0	✓	✓	0	0	✓	✓	0	✓
CD1. To minimise potential opportunities for crime and antisocial activity	0	0	0	0	0	0	0	✓	0	✓	✓	0

## Key

✓ = Objectives are compatible

✗ = Objectives are potentially incompatible

0 = There is no link between objectives

? = The link between the objectives is uncertain

### 4.2.1 Sustainability Comments

Each of the Core Strategy Strategic Objectives were assessed against the SA Objectives in a compatibility matrix to determine their compatibility and to identify any potential areas where new Strategic Objectives need to be established or the existing ones clarified.

On the whole, the Strategic Objectives and the SA Objectives complement each other, with many positive correlations and only five potential incompatibilities recorded. The link between three Strategic Objectives and three SA Objectives was recorded as uncertain.

All five potential incompatibilities were related to Strategic Objective 3, which deals with the development of new housing and new employment sites. Concerns were related to traffic, air quality, waste, energy consumption and biodiversity. These issues however, are partially mitigated by the all-encompassing Strategic Objective 1, as it is taken that a commitment to sustainable and environmentally friendly development will aim to reduce traffic or limit its growth, reduce waste levels and increase recycling and reduce energy consumption (through low carbon or carbon-neutral developments with increased efficiency and/or use of renewable energy or CHP schemes) along with protecting biodiversity.

The three uncertainties are associated with Strategic Objective 6, transport. These all related to traffic and increased movements (and its effects i.e. poor air quality). This is because the Strategic Objective supports both improvements to sustainable transport and an increase in road capacity. This issue is mitigated to some extent by clearly stating support for improving public transport and cycling and walking facilities.

### 4.2.2 Recommendations and Mitigation Potential

No recommendations or mitigation are proposed.

## 4.3 Core Strategy Policies

The following sections present a summary of the SA of the strategic spatial approach outlined in the Core Strategy. The detailed assessment of the Core Strategy Policies is provided in Appendix D and details of how these have been incorporated within the Core Strategy are set out in a separate Annex produced by Ipswich Borough Council. The Core Strategy comprises 20 Core Strategy Policies which we have grouped to ease the assessment process. The groups comprise:

Spatial Strategy	Policy CS2: The Location and Nature of Development
Development of the Strategy	Policy CS1: Sustainable Development – Climate Change
	Policy CS3: IP-One Area Action Plan
	Policy CS4: Protecting our Assets
	Policy CS5: Improving Accessibility

	Policy CS6: The Ipswich Policy Area
Live	Policy CS7: The Amount of New Housing Required
	Policy CS8: The Balance Between houses and Flats
	Policy CS9: Previously Developed Land Target
	Policy CS10: Ipswich Garden Suburb (formerly Ipswich Northern Fringe)
	Policy CS11: Gypsy and Traveller Accommodation
	Policy CS12: Affordable Housing
Work	Policy CS13: Planning for Jobs Growth
	Policy CS14: Retail Development and Main Town Centre Uses
Learn	Policy CS15: Education Provision
Play	Policy CS16: Green Infrastructure, Sport and Recreation
Infrastructure	Policy CS17: Delivering Infrastructure
	Policy CS18: Strategic Flood Defence
	Policy CS19: Provision of Health Services
	Policy CS20: Key Transport Proposals

Each policy was assessed against a 'do nothing' option in the 2009 Sustainability Appraisal, with the exception of policies DM33 and DM34 which were not included in the Core Strategy at that time. A 'do nothing' option is however considered in below in relation to these policies.

### 4.3.1 Spatial Strategy (CS2)

#### Sustainability Comments

The policy seeks to focus the majority of new residential development and community facilities into the town centre, the Waterfront, Ipswich Village, and Ipswich Garden Suburb and into or within walking distance of the town's district centres. Later in the plan period the council will look to work with neighbouring authorities to deliver housing in the wider Ipswich housing market area.

This approach, on the whole, scored positively against the economic and social SA Objectives. This was because it promotes sustainable growth, development and regeneration across the borough to meet local needs but also places the highest densities in central areas (within IP-One and local centres) which are most accessible and most densely populated. It directs primary retail development towards the town centre and employment uses to existing, established employment areas, also providing a strategic employment site at Futura Park. There is a heavy focus on improving sustainable travel and access together with dispersing open space throughout the borough. These later points may have benefits to the health and wellbeing of the community. This approach also maximises the use of previously developed land within the central areas which are also the least sensitive in terms of their natural environments. However, the central areas contain a number of heritage assets including historic buildings. There is some uncertainty regarding the effects of development on the setting of these assets although the policy does specify that heritage assets and historic character should not be compromised. There are also large areas of Flood Zones 2 and 3 within the central areas (IP One) therefore new development has the potential to increase flood risk, although, it is appreciated that this issue is covered by specific flood policies elsewhere within the Core

Strategy. It is recommended that these areas are not developed until the Ipswich Flood Defence Scheme is implemented.

Another key element of the spatial strategy is the delivery of a significant area of new residential and community uses within the Garden Suburb. This large greenfield site provides for a significant portion of Ipswich's housing needs and hence contributes strongly to this objective. It also seeks to ensure that local centres, amenities and the required infrastructure are also delivered. Nonetheless, this would result in the loss of one of the last remaining large greenfield areas within the borough and consequently this is reflected in the performance against a number of the environmental objectives including negative effects on the local landscape, soil, ground water quality/run-off and biodiversity. No designated areas would be affected by this and it should be possible to reduce the extent of adverse effects through mitigation and good design, notably through the provisions of the Garden Suburb SPD Interim Guidance (September 2014).

Overall the policy has a number of positive and negative scores against the environmental objectives to reflect the different aspects of the strategy as a whole. However, the increase in development is likely to increase the amount of waste produced and energy consumed. Carbon emissions are expected to increase although it is noted that elsewhere in the strategy there is a heavy emphasis on sustainable travel and sustainable building standards. The policy does not intend to propose development in areas that are covered by ecological designations. However, the proposals for the central urban areas and IP-One development are near to the Ramsar and SPA designations (also SSSI). It is not anticipated that the proposals would have likely significant effects on these areas directly although it will be important to consider the indirect effects of recreational pressure and undertake Habitats Regulations Assessment in conjunction with Natural England. This assessment is uncertain at this stage, however, it is important to note that this plan should be read as a whole and other policies (such as CS4 and DM31) would provide protection to these sites. The Appropriate Assessment<sup>7</sup> concluded no adverse effects upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review alone or in combination with the Suffolk Coastal District Core Strategy and Policies.

The effects of the spatial strategy on air quality and traffic were appraised as overall negative with a medium to low certainty. This reflects the cumulative increase in development and likely trip generation particularly in central areas and the Garden Suburb site. However, it should be noted that the policy encourages the provision sustainable travel options and encourages development within the central areas which are already well served by sustainable transport and close to existing and proposed employment and amenities. The SA concludes that traffic is likely to increase overall although whether this may have a significant effect on congestion, air quality and the AQMAs is not certain. It recommends that updated traffic modelling is undertaken and that all future applications continue to thoroughly assess the cumulative effects of traffic and emissions and propose robust mitigation in line with other policies within the Core Strategy and the Garden Suburb SPD.

An element of uncertainty was also recorded with regard to the development of around 4,000 new dwellings in neighbouring authorities in the long-term. At this stage it is not known where these dwelling may be constructed although it is assumed that they would be close to the Ipswich boundary. As such it is not possible to say with any certainty what the effects on the SA

---

<sup>7</sup> The Appropriate Assessment report relates to assessment under the Habitats Directive and is available as a separate report.

Objectives would be, especially the environmental objectives which require a greater knowledge of location.

## Mitigation / Enhancement Measures

The following mitigation / enhancement measures have been suggested to improve the sustainability performance of the policy:

- It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance in the SPD, Policy CS5, Policy DM17 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.
- The policy may benefit from a specific reference to ensuring the public realm is of a high quality design along with new structures. However, it is noted that Design mitigation is provided in the Garden Suburb SPD, Policy DM5 and the Urban Character SPD.

## Alternatives

As identified in Section 3.3.1, only one reasonable alternative to the spatial strategy has been identified. This considers the potential for securing higher density development on housing sites to deliver a higher number of homes. Assuming that in future years this would be economically viable, this would mean delivering an additional 4,000 homes on sites and through windfalls from 2020/21 onwards which are currently anticipated to deliver 5,175 homes. If the additional 4,000 were to be shared evenly amongst the sites this would lead to almost doubling the proposed densities. Whilst it was concluded that this is unlikely to be deliverable at present due to economic conditions, this option could represent a realistic alternative in the longer term should economic conditions change. It would be an alternative to the proposed wording of policies CS2 and CS7 which states that the council will work with neighbouring local authorities to address housing need later in the plan period.

A detailed appraisal of the Alternative Strategy is provided alongside the Spatial Strategy in Appendix D. This concludes that providing for a higher density of new homes on the housing sites would generally perform negatively against the SA Objectives in terms of the following:

The alternative strategy provides for a higher density of new homes within the housing sites which may lead to greater traffic congestion and increased vehicular emissions compared with the preferred option as there would be a larger increase in population at each site therefore a higher concentration of vehicle use in each location.

In addition, providing higher density development may lead to greater adverse effects on biodiversity, heritage assets, soil resources and landscape / townscape character than proposed CS2 as there would be less scope to provide soft landscaping, urban greening, new green infrastructure, areas of open space or potential new Local Nature Reserves – all of which create opportunities to enhance the natural, built and historical landscape. It may also result in a less diverse housing mix with more flats and smaller homes which may mean that housing needs across the borough are not adequately met.

Finally higher density development within areas susceptible to flooding in Ipswich may exacerbate current issues as there would be a reduced scope to incorporate open space and SuDS measures into new development.

However, the alternative was judged to perform positively in relation to conserving soil resources, minimising emissions related to climate change and conserving biodiversity, landscapes and townscapes of neighbouring authority areas.

In all other respects the alternative would perform similarly to proposed CS2.

Having considered the assessments of the alternative and proposed CS2, it is concluded that on balance the proposed CS2 would provide greater sustainability benefits for the reasons outlined above and would also offer greater certainty in terms of deliverability should economic circumstances not create favourable conditions for higher density development in the future. Therefore the Alternative Strategy was not taken further in the development of the Core Strategy.

## 4.3.2 Development of the Strategy (CS1, CS3, CS4, CS5 and CS6)

### Sustainability Comments

On the whole the policies scored positively against the SA Objectives.

CS1, CS4 and CS5 provide strong central policy for the Core Strategy as a whole by requiring a comprehensive approach to tackling climate change (through reducing energy use, carbon emissions and flood risk); conserving and enhancing the borough's built, historical, natural and geological assets; and, improving accessibility through the location of development, managing travel demand and encouraging sustainable transport measures.

The environmental SA Objectives scored particularly well against these policies. This was largely due to the focus of Policy CS4 on protecting assets and the contribution of CS1 and CS5 on helping to reduce carbon and air quality emissions.

CS3 promotes the development of an IP-One Area Action Plan which will allocate and define a range of regenerative measures in this area including Ipswich Village, the Waterfront, parking, an Education Quarter and built and natural environmental improvements. This policy reflects some of the benefits relating to a town centre focus within the spatial strategy (CS2) including the economic and social advantages to regeneration in this accessible area. Flood risk is a potential problem with much of the area within Flood Zone 2 or 3. This will be mitigated by the Ipswich Flood Defence Scheme once complete although it is recommended that development is phased to avoid flood risk areas until this time, as set out in CS18 with timescales for development identified in SP2 of the Site Allocations DPD. As per Policy CS2 there were also overall negative scores recorded for Policy CS3 against the SA Objectives associated with air quality, climate change and reducing the effects of transport on the environment. This was because it is likely that overall vehicle trips in this area will increase although whether this is likely to have a significant effect on air quality and the AQMAs is uncertain at this stage. It should also be noted that whilst overall negative effects were ascribed, Policy CS3 focusses a large proportion of housing development within the central urban area which could be seen as positive as the area contains the majority of amenities and jobs and is accessible by public transport.

Policy CS6 recognises the importance of joint working with neighbouring authorities to coordinate planning policies around the fringes of Ipswich. It is assumed that this will benefit the overall delivery of sustainable development in relation to a number of sustainability objectives.

## Mitigation / Enhancement Measures

The following mitigation / enhancement measures have been suggested to improve the sustainability performance of the policies:

- It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance within Policy CS5 and the Travel Ipswich Scheme.
- Policy CS4 could be strengthened though a direct reference in the policy wording to protecting and enhancing the boroughs soil resource and function.
- It is noted that there are overlaps between Policy CS4 and DM31. Nonetheless, there is considerable scope to expand Policy CS4 given its overarching nature at the front of the plan, in particular to protect and enhance the borough's designated natural assets including principally European, National and local level designations. A reiteration of the text in DM31 regarding protection of the European sites is recommended.
- Although it is not the purpose of Policy CS3 it should be ensured new development integrates well into the existing townscape, it is therefore recommended that a specific reference to this is included within CS3.

## Alternatives

The consideration of 'do nothing' i.e. 'no policy' was undertaken in the 2009 against Policies CS1, CS3, CS4, CS5 and CS6. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because there would be fewer opportunities for providing control and direction, lower environmental standards and fewer opportunities for enhancement and regeneration.

There have been minor changes to Policy CS1 since the 2013 focussed review. This reflects changes in relation to the Council's carbon reduction target and reference to support Travel Ipswich's 15% modal shift is now included. However, the carbon reduction target was only relevant to the Council's own operations and therefore unlikely to significantly affect new development. The inclusion of the reference to support Travel Ipswich's 15% modal shift would help to reduce carbon emissions further in the borough and may benefit air quality, the AQMAs and health though encouraging people to walk / cycle rather than using their cars. Minor changes to Policies CS3, CS4, CS5 and CS6 are not considered to have made a significant difference to the SA.

### 4.3.3 Live (CS7, CS8, CS9, CS10, CS11 and CS12)

#### Sustainability Comments

These policies cover the amount and type of housing required including some locational direction in CS9 (Previously Developed Land) and CS10 (Ipswich Garden Suburb).

The amount of new housing required is set by the establishment of housing needs. This therefore performs strongly against the SA Objectives relating to housing need and other social and economic objectives. In essence the appraisal of policy CS7 also reflects the location of housing appraised in policy CS2. Similarly, policies CS8, CS11 and CS12 refer to the need to meet the needs of different groups and again perform strongly against SA Objective 'ER3. *To help meet the housing requirements for the whole community*'. CS11 stops short of identifying land for gypsy and traveller accommodation but provides guidance on site selection including minimising any adverse effects.



Policy CS9 encourages development to be on previously developed land first. This is a sustainable approach which is also more likely to avoid areas of ecological and landscape value.

Policy CS10 reiterates the role and structure of the Garden Suburb proposal including the range of uses proposed within it and the requirement to follow the Supplementary Planning Document which lays out clear principles for how the site should be developed including phasing and infrastructure provision. In essence the Garden Suburb has been appraised as part of CS2 and the scores relevant to the site are reflected here. In particular, the policy performs strongly in terms of meeting housing needs, access to services and a range of social benefits for the new residents. It is nonetheless a large greenfield development which is likely to affect the local landscape and a number of other environmental features, albeit it may be possible to reduce these through careful planning and mitigation. The Appropriate Assessment<sup>7</sup> concluded no adverse effects upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review alone or in combination with the Suffolk Coastal District Core Strategy and Policies.

As per the previous policy summaries, the 7,234 new homes to be developed in the borough would increase vehicle movements which may affect local air quality and potentially the four AQMAs although the significance of this is uncertain at this stage. In addition, the 4,051 to be delivered through working with neighbouring authorities may also affect air quality depending upon their location, although, without knowing where these could be located there is considerable uncertainty regarding this. However, a significant emphasis has been placed on promoting sustainable travel within the Core Strategy which should reduce this impact. This is reiterated in the Garden Suburb Supplementary Planning Document Interim Guidance (September 2014). At this stage overall negative effects have been ascribed to Policies CS7 and CS10 overall with regard to air quality and the effects of traffic on the environment.

## Mitigation / Enhancement Measures

The following mitigation / enhancement measures have been suggested to improve the sustainability performance of the policies:

- It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, Policy DM17 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.
- That said opportunities should be sought (particularly within Policy CS10) to encourage recycling within the new housing developments. Facilities should be provided to encourage reuse/recycling.
- Policy CS11 could be strengthened though removing the reference to conservation areas and historic sites in clauses ii and iii respectively and adding a new clause that states 'heritage assets'.

## Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against Policies CS7, CS8, CS9, CS10, CS11 and CS12. In the case of CS8, CS9, CS10, CS11 and CS12 the 'do nothing' scenario performed worse against the SA Objectives than with the policies in place as without the policies housing mix would become unbalanced, developer led and there would unlikely be enough affordable family homes delivered. For Policy CS7 the 'do nothing' scored better against some of the environmental SA Objectives as no target in place would result in a

lower number of homes being built – although it should be noted that housing need would not be met.

As relatively significant changes were proposed to CS7 and CS10 as part of the Draft Core Strategy Focused Review which was consulted on in early 2014, the SA considered an alternative ‘do nothing’ option which would mean relying upon the policies in the adopted 2011 Core Strategy. An alternative of a lower level of housing at the Garden Suburb was considered as part of the alternatives under CS2 (refer to section 4.3.1) although was not considered to be reasonable.

There have been minor changes to Policies CS7 and CS9 since the 2013 focussed review. Changes included updated housing targets and the removal of the 60% target for developing on previously developed land. The updates were due to previous targets no longer being considered reasonable alternatives especially with regard to the limited amount of previously developed land available in the Borough and the fact that housing numbers are based on an objectively assessed need. Changes to the other policies in this section, such as the removal of allocations for gypsy and traveller pitch provision in the Site Allocations DPD and amendments to the affordable housing targets are not considered to have made a significant difference to the SA.

#### 4.3.4 Work (CS13 and CS14)

##### Sustainability Comments

Policies CS13 and CS14 seek to provide significant employment (including retail) opportunities (i.e. 12,500 new jobs) within the Borough. Therefore, the policies score very strongly against the economic SA Objectives. Together they would provide the foundations to improve existing high levels of income and employment deprivation, improve the vitality and viability of the Ipswich Central Shopping Area, encourage new business formation and encourage inward investment. This could have indirect benefits to a number of social objectives including encourage healthy lifestyles through focussing employment development within the accessible town centre which may help promote walking and cycling to work. CS14 seeks to promote retail and other town centre uses within the town centre. The principle of the growth of town centre uses in this area is reflected in the appraisal of the spatial strategy CS2.

The creation of new employment opportunities may also result in potentially negative environmental effects (e.g. increase in traffic, waste, energy, effects on biodiversity, townscape character, flooding etc) depending on the design of the site and its location. Those sites which are within areas of flood zone may also increase the risk of flooding and should not be developed until the Ipswich Flood Defence Scheme is operational as set out in CS18 and in policy SP2 of the Site Allocations DPD. Many sites are in central locations but others are spread across wider areas of the Borough. Scores in this case are largely both positive and negative which reflects the potential for such negative effects but also the ability for new employment sites to regenerate previously developed sites and to improve the character of some areas through mitigation and enhancement measures. The principles of this are reflected in the appraisal of CS2 including regarding traffic and air quality.

##### Mitigation / Enhancement Measures

The following mitigation / enhancement measures have been suggested to improve the sustainability performance of the policies:

- It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the

guidance in the Garden Suburb SPD, Policy CS5. Policy DM17 and the Travel Ipswich Scheme.

- With regards to flooding, it should be ensured that the allocated 30ha (minimum) of new employment development (Policy CS13) is outside flood zones 2 and 3, which may mean waiting until the proposed flood defences are completed.
- It should be ensured that the 30ha (minimum) of new employment development (Policy CS13) is located away from statutory designated sites and is well integrated into the existing environment.

## Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 against Policies CS13 and CS14. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because without the policies employment may not be focused within accessible locations i.e. out of town retail may be developed and fewer jobs may be created as there would be no targets.

There have been minor changes to Policy CS13 since the 2013 focussed review. The policy now plans for 12,500 jobs rather than 18,000 and provides for 10ha of development at Futura Park rather than 16.7ha. This update was due to previous targets no longer being considered reasonable alternatives following a change in economic conditions.

Minor changes to Policy CS14 are not considered to have made a significant difference to the SA.

### 4.3.5 Learn (CS15)

#### Sustainability Comments

Policy CS15 seeks to ensure the provision of educational facilities in the Borough. Therefore largely positive scores were recorded against the social and economic policies, as providing educational facilities in accessible locations may encourage people to walk / cycle to school, would create construction jobs and elementary jobs, would help to support the vitality and viability of the centres and may even potentially attract businesses to locate near them.

Regarding the environmental SA Objectives, securing educational development on previously developed land such as the Suffolk New College and University Campus Suffolk would represent a positive use of land resources and may protect biodiversity resources. However, conversely educational development at the Garden Suburb would not represent a sustainable use of land resources as the site is greenfield and may adversely affect biodiversity resources. Effects on heritage assets were assessed as uncertain as it would depend upon where educational development was specifically located, this may also be true for landscape / townscape character, however, ensuring high quality design that complements and enhances the character and quality of the local townscape would mitigate against any adverse effects.

#### Mitigation / Enhancement Measures

The following mitigation / enhancement measures have been suggested to improve the sustainability performance of the policy:

- It is recommended that the policy should include a link to the Travel Ipswich scheme.

## Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 against Policy CS15. The 'do nothing' performed worse against the SA Objectives than with the policy in place. This was because there would be no guidance in place to support educational provision to meet local need.

There have been minor changes to Policy CS15 since the 2013 focussed review i.e. the removal of support for a new 14 – 19 centre outside the borough, however, this and other changes are not considered to have made a significant difference to the SA scores on the whole.

### 4.3.6 Play (CS16)

#### Sustainability Comments

Policy CS16 seeks to enhance and extend the ecological network, green corridors and open spaces across Ipswich. Therefore, positive scores were recorded against many of the environmental SA Objectives. This was because policy would help to protect and conserve biodiversity resources, maintain soil quality, reduce effects of traffic upon the environment by encouraging more sustainable movement across networks, protect designated sites and conserve and enhance the quality and local distinctiveness of landscapes and townscapes.

Positive scores were also recorded against the social SA Objectives as the policy may contribute to encouraging healthy lifestyles through the provision of safe and freely accessible open spaces, sport and recreational facilities. It would also help to protect residents from amenity pollution and noise and light pollution which would contribute towards improving the quality of life where people live.

The scores against the economic SA Objectives were largely neutral, however, providing green spaces in accessible locations may help to improve access to shops, services and facilities across the borough and may help to improve the image and reputation of local areas as places to live, work and visit.

#### Mitigation / Enhancement Measures

No mitigation or enhancement measures were suggested to improve the sustainability performance of the policies.

## Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against Policy CS16. The 'do nothing' option performed worse against the SA Objectives than with the policy in place. This was because there would be no guidance in place to support the provision of green infrastructure, sport and recreation facilities that benefit health and wellbeing along with providing many environmental benefits such as new habitats, flood storage and positive effects on townscape/ landscape character and quality.

There have been minor changes to Policy CS16 since the 2013 focussed review including support for the provision of an extension to the Orwell Country Park and potentially a visitor centre - subject to effects on the SPA. This would provide greater opportunities for recreation and healthy lifestyles and may enhance the image of Ipswich as a place people want to visit.

## 4.3.7 Infrastructure (CS17, CS18, CS19 and CS20)

### Sustainability Comments

Policies CS17, CS18, CS19 and CS20 collectively seek to ensure infrastructure needs associated with new development are met. Therefore largely positive and neutral effects were recorded across the social, environmental and economic SA Objectives. Adequate infrastructure would help to relieve congestion at key routes of the Borough and the requirement for funding for off-site measures could help to address wider road capacity and congestion issues and thus result in improved air quality in the long term. The policies also seek to improve access to open space, school and health facilities and play areas in addition to providing new areas – this would also have health benefits and may enhance quality of life. CS18 would create major benefits in terms of reducing the risk of flooding through the support to implement the Ipswich Flood Defence Management Strategy.

Policies CS17, CS18, and CS20 would also all encourage sustainable economic growth through their commitment to provide key infrastructure thus facilitating new business formation and meeting the needs of business through improved access. In addition, town centre enhancements and enhanced pedestrian environment at the Waterfront may attract more visitors which will support the local economy.

### Mitigation / Enhancement Measures

No mitigation or enhancement measures were suggested to improve the sustainability performance of the policy.

### Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 against Policies CS17 (this was also re-assessed in 2013), CS18, CS19 and CS20. The 'do nothing' performed worse against the SA Objectives than with the policies in place. This was because there would be fewer opportunities for providing control and direction, lower environmental standards (i.e. less emphasis on avoiding development in flood zones) and fewer opportunities for the enhancement of infrastructure and facilities provision. However, it should be noted that even without these policies in place, other measures such as national planning policy guidance and the role of statutory regulators would still be enforced.

There have been minor changes to CS20 since the 2013 focussed review. Policy CS20 no longer includes reference to the 'Bacon Chord', however, this is because the project has now been completed. Minor changes to other policies are not considered to have made a significant difference to the SA.

## 4.4 Development Management Policies

The following sections present a summary of the SA of the development management policies outlined in the Core Strategy. The detailed assessment of the development management policies is provided in Appendix E. The Core Strategy comprises 29 Development Management Policies which we have grouped to ease the assessment process. The groups comprise:

Sustainable Development, Flooding and Policy DM1: Sustainable Design and Construction  
Sustainable Drainage

Policy DM2: Decentralised Renewable or Low Carbon Energy

	Policy DM3: Provision of Private Outdoor Amenity Space in New and Existing Developments
	Policy DM4: Development and Flood Risk
Urban Design Policies and Protecting Our Assets	Policy DM5: Design and Character
	Policy DM6: Tall Buildings
	Policy DM8: Heritage Assets and Conservation
	Policy DM9: Buildings of Townscape Interest
	Policy DM10: Protection of Trees and Hedgerows
Small Scale Residential Development, Small Scale Infill and Backland Residential Development, Subdivision of Family Dwellings, Affordable Housing and the Density of Residential Development	Policy DM12: Extensions to Dwellinghouses and the Provision of Ancillary Buildings
	Policy DM13: Small Scale Infill and Backland Residential Developments
	Policy DM14: The Sub-division of Family Dwellings
	Policy DM24: Affordable Housing
	Policy DM30: The Density of Residential Development
Transport and Access	Policy DM17: Transport and Access in New Developments
	Policy DM18: Car and Cycle Parking
Proposals in Retail Areas	Policy DM20: The Central Shopping Area
	Policy DM21: District and Local Centres
	Policy DM22: Town Centre Uses Outside the Central Shopping Area
	Policy DM23: Retail Proposals Outside Defined Centres
Employment Land	Policy DM25: Protection of Employment Land
Amenity, Open Space, Sport and Recreation and Community Facilities	Policy DM26: Protection of Amenity
	Policy DM27: Non-residential Uses in Residential Areas
	Policy DM28: Protection of Open Spaces, Sport and Recreation Facilities
	Policy DM29: Provision of New Open Spaces, Sport and Recreation Facilities
	Policy DM32: Protection and Provision of Community Facilities
The Natural Environment	Policy DM31: The Natural Environment
	Policy DM33: Green Corridors
	Policy DM34: Countryside

## 4.4.1 Sustainable Development, Flooding and Sustainable Drainage (DM1, DM2, DM3 and DM4)

### Sustainability Comments

The policies generally scored positively against the SA Objectives. This was largely due to the nature of the policies seeking to promote sustainable development. There were, however, uncertainties recorded against Policy DM2 '*Decentralised Renewable or Low Carbon Energy*' and the SA Objectives associated with biodiversity, heritage assets and landscape. This was because renewable and low carbon energy schemes have the potential to impact on the setting of heritage assets, change landscape character and adversely affect biodiversity (particularly birds and bats with regards to wind turbines). As the location of such development is unknown, effects were deemed uncertain. Policy DM4 scored well against the environmental SA Objectives ET6 '*To limit and adapt to climate change*' and ET7 '*To protect and enhance the quality of water features and resources and reduce the risk of flooding*' as it ensures new development does not exacerbate current flooding in the borough along with providing SuDs measures where appropriate. Policy DM4 also ensures water efficiency measures are maximised in new development.

The scores against the social and economic SA Objectives were largely neutral with some positives. This was due to the limited effects the policies could lead to. Positive scores were associated with ensuring new development is highly accessible to existing facilities, including health facilities and through committing to a minimum BREEAM standard which may help to encourage investment (the provision of sustainable offices). Also, ensuring development achieves a minimum Level 4 of the Code for Sustainable homes and conversions achieve a minimum BREEAM Domestic Refurbishment 'Very Good', may contribute to improving housing stock which could reduce high levels of living environment deprivation within the borough.

### Mitigation / Enhancement Measures

The following mitigation / enhancement measure has been suggested to improve the sustainability performance of the policies:

- It is recommended that Policy DM2 includes reference to the need for any new energy sources to be fully assessed for their effects on the natural and built environment and local amenity. Proposals should only be allowed where they do not incur significant adverse effects.

### Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against the policies. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because there would be fewer opportunities for providing direction to encourage sustainable development or encouraging private amenity space and lower environmental standards i.e. less guidance to ensure development does not occur in flood zones. However, note that other national policy measures and the role of the Environment Agency would still apply.

There have been minor changes to Policy DM1 since the 2013 focussed review. The policy now requires lower Code for Sustainable Homes and BREEAM standards. Although standards have been reduced in the updated policy, a high standard is still required, however, the standards required are now more viable, achievable and deliverable so may result in more developers meeting the requirements albeit at a cost of slightly lower standards. Minor changes to Policies DM2, DM3 and DM4 are not considered to have made a significant difference to the SA scores.

## 4.4.2 Urban Design Policies and Protecting Our Assets (DM5, DM6, DM8, DM9 and DM10)

### Sustainability Comments

The policies collectively seek to ensure high quality design whilst protecting the Borough's built and natural assets. Therefore, the policies scored well against the environmental SA Objectives. Policies DM5, DM6, DM8 and DM9 all benefit landscape / townscape / heritage through their commitment to retaining buildings of townscape interest, ensuring tall buildings do not have adverse effects on the setting of Conservation Areas and promoting high quality design, all of which would help to protect the character of the urban areas. Policy DM9 supports protection, retention and repair buildings judged to be of local townscape interest, particularly those with no other statutory protection. Policy DM10 commits to providing and protecting urban greening – this would benefit local townscape along with, providing biodiversity and air quality benefits.

Effects against the social and economic SA Objectives were largely neutral with some positive scores. Under DM5, positive scores were related to promoting mixed use developments and neighbourhoods. This could lead to a reduced need to travel and improved access to key local services such as GPs, dentists etc. In addition, requiring new layouts and designs to be orientated towards cyclists and pedestrians could promote healthier and more sustainable forms of transport in Ipswich and help combat conditions such as obesity and its related health conditions. It should also be noted that improving the built environment in Ipswich over time may also encourage and accommodate both indigenous and inward investment.

### Mitigation / Enhancement Measures

The following mitigation / enhancement measure has been suggested to improve the sustainability performance of the policies:

- Policy DM10 may benefit further through including a reference to the Hedgerow Regulations 1997 which protect 'important hedgerows' from being removed (uprooted or destroyed).

### Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 against the policies. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because there would be fewer opportunities for providing control or opportunities for enhancement of the built environment in Ipswich.

There have been minor changes to Policy DM8 since the 2013 focussed review. The policy has now been expanded to protect not only Conservation Areas but other heritage assets in Ipswich. Therefore the policy provides greater protection of the historic environment and heritage assets. Minor changes to other policies are not considered to have made a significant difference to the SA.



### 4.4.3 Small Scale Residential Development, Small Scale Infill and Backland Residential Development, Subdivision of Family Dwellings, Affordable Housing and the Density of Residential Development (DM12, DM13, DM14, DM24 and DM30)

#### Sustainability Comments

The policies seek to manage small infill development, extensions, the sub-division of family homes, the provision of affordable housing and the density of new development (i.e. high within the town centre and lower elsewhere). All of which scored well against the social SA Objectives as they seek to ensure there is the right mix of new homes to meet local needs. The policies were also deemed to have health benefits as they would ultimately improve housing stock.

It should be noted that the principle and general location of new homes within the Borough was assessed within Policies CS2 and CS7. Therefore the assessment of Policies DM12, DM13, DM14 and DM30 focussed on the details relating to the type and make up of new housing. For this reason effects on the environment were limited. Although, effects against the environmental SA Objectives on the whole were recorded as positive and negative against Policy DM30 'the density of residential development'. This was because locating higher density homes within the town centre would mean more homes may be located in flood zones, may increase vehicle travel in an area with four AQMAs and may adversely affect the setting of heritage assets. However, there are a far fewer biodiverse spaces in town centre where high density development is proposed, the policies propose densities that are more appropriate to the existing townscape character, and propose higher densities of homes in more accessible locations.

Effects against the economic SA Objectives on the whole were recorded as neutral, although it is worth noting that higher density development within the town centre would ensure homes are close to amenities, jobs and transport hubs.

#### Mitigation / Enhancement Measures

The following mitigation / enhancement measure has been suggested to improve the sustainability performance of the policies:

- For Policy DM13, the loss of green space should be resisted where it would result in a significant loss of vegetation, trees etc that support valuable habitats.

#### Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against the policies. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because without the policies there may become an imbalance in housing mix which does not meet local need. In addition, there may be less control over developing in gardens and extensions to existing homes which may lead to lower environmental standards.

There have been minor changes to Policies DM12, DM13, DM14, DM24 and DM30 since the 2013 focussed review, however, they are not considered to have made a significant difference to the SA.

## 4.4.4 Transport and Access (DM17 and DM18)

### Sustainability Comments

Together the policies ensure that transport and access provision is incorporated into new development that promotes sustainable traffic patterns in Ipswich. Policy DM17 states that to promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall not result in a significant adverse impact on rights of way or the local road network in respect of traffic capacity, highway safety, air quality or the four AQMAs. Therefore a number of positive effects were recorded against the SA Objectives relating to air quality, climate change, access, promoting sustainable transport and health. In addition, improvements to transport and access may over the long term support vital and viable town, district and local centres through improved accessibility. This would also be supported through improved cycle parking provision across the Borough and limited parking within the town centre.

### Mitigation / Enhancement Measures

No mitigation or enhancement measures were suggested to improve the sustainability performance of the policies.

### Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against the policies. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because there would be fewer opportunities for providing control and direction for sustainable transport. Over time there would be an increase in private car use and greater adverse effects on air quality and the AQMAs.

There have been minor changes to Policies DM17 and DM18 since the 2013 focussed review, however, they are not considered to have made a significant difference to the SA.

## 4.4.5 Proposals in Retail Areas (DM20, DM21, DM22 and DM23)

### Sustainability Comments

The policies collectively seek to focus retail development within a defined area, to retain and provide local shops and community facilities within defined District and Local Centres, to provide leisure, recreation, culture and tourism uses within the IP-One Area but outside the Central Shopping Area and to manage retail development outside defined District and Local Centres. Therefore, on the whole the policies performed well against the SA Objectives that seek to improve access, support vital and viable town centres, promote sustainable levels of prosperity and economic growth and encourage inward investment - as the policies together seek to focus appropriate retail and commercial development within defined boundaries and deter inappropriate use.

### Mitigation / Enhancement Measures

No mitigation or enhancement measures were suggested to improve the sustainability performance of the policies.

### Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against the policies. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because there would be fewer opportunities for providing control and

direction for retail development. Without the policies in place this could lead to more out of town retail units which are not accessible or meet local need.

There have been minor changes to Policies DM20, DM21, DM22 and DM23 since the 2013 focussed review, however, they are not considered to have made a significant difference to the SA.

## 4.4.6 Employment Land (DM25)

### Sustainability Comments

The policy seeks to safeguard employment land within existing and allocated employment sites in Ipswich. Therefore, effects against the economic and social SA Objectives were largely assessed as positive as safeguarding employment areas in accessible locations may offer opportunities for new jobs over the medium to long term, may encourage new business formation, would support district and local centres and may and diversify employment opportunities.

Effects against the environmental SA Objectives exhibited more negative effects and uncertainties. Policy DM25, may lead to an increase in vehicle movements related to people accessing employment which may negatively impact air quality, the AQMAs, carbon emissions and the effects of transport on the environment although there is some uncertainty over whether this is significant or not. However, the clustering of employment areas within accessible locations may indirectly encourage people to access employment via sustainable modes of transport. Effects on waste and flood risk were assessed as negative as the policy may over the long term increase waste production and increase flood risk within the IP One Area,.

### Mitigation / Enhancement Measures

The following mitigation / enhancement measure has been suggested to improve the sustainability performance of the policies:

- Effects on water quality / pollution could be mitigated using standard, accepted mechanisms such as the Environment Agency's Pollution Prevention Guidelines.

### Alternatives

The consideration of 'do nothing' i.e. no policy, was undertaken in the 2009 SA. The 'do nothing' option performed worse against the SA Objectives than with a policy in place. This was because there would be no safeguarding of existing employment sites which may lead to ad hoc employment development across the borough and potentially insufficient employment land coming forward.

There have been minor changes to Policy DM25 since the 2013 focussed review. The policy now includes a list of existing employment areas within the borough which should be safeguarded throughout the plan period. Therefore the policy now provides a greater protection to existing employment sites though this specific reference.

## 4.4.7 Amenity, Open Space, Sport and Recreation and Community Facilities (DM26, DM27, DM28, DM29 and DM32)

### Sustainability Comments

The policies seek to protect the amenity of Ipswich's residents, manage non-residential use in residential areas, protect and provide open space, sport, and recreational facilities and protect and provide community facilities to meet local need.

Effects against the environmental SA Objectives were on the whole positive as protecting and providing open space would protect soil resources, may provide new habitats for wildlife, may provide flood storage and provide urban greening which may benefit townscape character.

Effects against the social SA Objectives were also largely beneficial as the policies seek to protect and increase the provision of open space, recreational facilities and opportunities for sport which would contribute to promoting healthy lifestyles across the borough. In addition, Policies DM25 and DM26 specifically seek to guard against adverse effects on amenity resulting from new development. They seek to do this by refusing development that would cause a material nuisance (i.e. through noise, light pollution etc.) and where it would be detrimental to human health, therefore effects were recorded as positive.

The policies against the economic SA Objectives were on the whole neutral. However, the commitment to the protection and provision of community facilities to meet local need may contribute to ensuring district and local centres are viable.

### Mitigation / Enhancement Measures

No mitigation or enhancement measures were suggested to improve the sustainability performance of the policies.

### Alternatives

The consideration of 'do nothing' i.e. no policy was undertaken in the 2009 SA against the policies. In each case 'do nothing' performed worse against the SA Objectives than with a policy in place. This was because there would be fewer opportunities for providing control and direction and fewer opportunities for the enhancement and provision of open and amenity space. In addition the provision of community facilities to meet local needs may not be realised.

There have been minor changes to Policies DM26, DM27, DM28, DM29 and DM32 since the 2013 focussed review, however, they are not considered to have made a significant difference to the SA scores.

## 4.4.8 The Natural Environment (DM31, DM33 and DM34)

### Sustainability Comments

The policies seek to guard the natural environment (including European sites and the countryside) against inappropriate development and provide and enhance green corridors.

Due to the nature of the policies many positive scores were recorded against the environmental SA Objectives. Policy DM31 specifically commits to protecting and enhancing biodiversity across the borough, from European sites and SSSIs to County Wildlife Sites, Local Wildlife Sites and sites important for their geodiversity. It also makes specific provision for the protection

of European sites that mirrors the Habitats Directive. In addition, to establishing an ecological network across the borough all of which would benefit local wildlife along with helping to facilitate its movement throughout the borough. Policy DM34 would also benefit soil resources through its commitment to retaining the best and most versatile agricultural land. Positive effects were also recorded against the SA Objectives that protect and enhance the quality of water features and conserve and enhance local landscapes and townscapes.

There may be health benefits associated with the policies as the establishment of attractive green corridors and ecological networks that connect the borough along with improving links to open spaces / the countryside may encourage people walk / cycle which in turn may encourage healthy lifestyle choices and benefit mental wellbeing.

Effects against the economic Objectives on the whole were neutral. However, the development of multi-functional green infrastructure in urban areas may contribute to making urban Ipswich an attractive place people may want to invest in.

## Mitigation / Enhancement Measures

The following mitigation / enhancement measure has been suggested to improve the sustainability performance of the policies:

- Policy DM31 could be strengthened through making reference to 'alone or in-combination with other proposals'.

## Alternatives

The 'do nothing' option, i.e. no policy instead of DM31, DM33 and DM34 would perform worse against the SA Objectives than with the policies in place. This is because there would be less protection afforded to protecting the natural environment, providing and protecting green corridors and guarding the countryside from inappropriate assessment.

There have been significant changes to Policy DM31 since the 2013 focussed review. The policy now affords protection to the whole natural environment rather than local natural and geological interest. This would therefore help to improve the performance of the policy against the environmental SA Objectives and clarifies the protection afforded to European site. Policies DM33 and DM34 were not previously included within 2013 focussed review, therefore a comparison cannot be made.

# 5 CUMMULATIVE EFFECTS

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).

The assessment of the policies 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 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.

Table 5-1 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. The cumulative and synergistic effects identified below are considered to be significant effects.

**Table 5-1 Cumulative and Synergistic Impacts**

Receptor	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
Education provision and educational attainment (CL1 To maintain and improve access to education and skills for both young people and adults)	Positive	Educational attainment in the borough is generally low. The policies are likely to generate positive impacts upon educational attainment through: New and diverse employment provision which would provide skills and training opportunities; through allocating sites for education uses; through local partnerships and initiatives; and also through the provision of new educational facilities at the Garden Suburb.
Crime and fear of crime (CD1 To minimise potential opportunities for crime and anti-social activity)	Neutral / Positive	Crime levels are generally higher across the Borough when compared to national average figures. The projected housing and population growth may result in an influx of new residents and thus have a negative effect on crime level figures in the short-term. However, effects are assessed as neutral/positive in the long-term as cumulatively it is considered that the policies in the Core Strategy would contribute to the achievement of social and economic objectives which may indirectly result in reduced crime levels. The level of certainty of prediction is low.
Access to goods and services (ET5 To improve access to key services for all sectors of the population)	Positive	There is a clear focus on ensuring adequate local service provision is provided as part of new development along with making sure that new development is accessible by public transport, walking and cycling links.
Health and wellbeing (HW1 To improve the health of those most)	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

Receptor	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
in need HW2 To improve the quality of life where people live and encourage community participation)		factors, there is the potential for policies and their application to contribute to improved well-being. This could be achieved through ensuring new housing and employment development is well designed and accessible along with developing a green infrastructure network and ensuring that areas of green space are available for formal and informal recreation. There would also be an ongoing benefit on health and well-being that would increase cumulatively over time.
Housing (ER3 To help meet the housing requirements for the whole community)	Positive	Cumulatively, the policies in the Core Strategy that address housing ensure that new housing development occurs in the most appropriate locations and meets the needs of a wide range of people. These policies, combined with those addressing infrastructure provision and accessibility all cumulatively ensure housing is supported by the appropriate range of facilities and is accessible to local services creating a high quality housing offer.
Sustainable economic growth (ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area)	Positive	Cumulatively, the proposals in the Core Strategy would have a positive effect on sustainable growth throughout the Borough as employment opportunities would increase both in the short-term and the long-term through increasing the housing provision and the provision of employment land. This in combination with infrastructure improvements would create an attractive environment which may attract inward investment and encourage business growth.
Biodiversity (ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs)	Positive / Negative	The policies in the Core Strategy on the whole would have both negative and positive effects on biodiversity and designated sites within the Borough. Cumulatively, land take for new development may have a negative effect associated with fragmentation and potential loss of habitats and species. However, the Core Strategy would present opportunities to enhance wildlife corridors, which cumulatively would benefit biodiversity. Positive effects may also occur as a result of the delivery of green infrastructure, enhancement of habitats within new developments (through the country park at the Garden Suburb and opportunities to enhance and provide new open space) and the remediation of contaminated land.
Landscape / townscape (ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes)	Positive / Negative	Cumulatively, it is considered that urban expansion and projected growth would have both positive and negative effects on landscape due to significant changes in landscape character as a general result of new development and the direct loss of agricultural land at the Garden Suburb. However, policies in the Core Strategy cumulatively ensure that local distinctiveness is protected, in addition to ensuring that rural character is protected. Some town centre regeneration projects may also improve existing derelict or run-down sites.
Climate change Air quality Energy efficiency Natural resources	Positive / Negative	The policies in the Core Strategy has a strong focus upon ensuring new development is accessible by public transport, walking and cycling links and that new housing, services and employment opportunities are appropriately sited. All of these measures should contribute in the long-term to enabling sustainable patterns of living and travel to be developed which could have a

Receptor	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
<p>Sustainable travel / transport</p> <p>(ET1 To improve air quality</p> <p>ET4 To reduce the effects of traffic upon the environment</p> <p>ET6 To limit and adapt to climate change</p> <p>ER6 To encourage efficient patterns of movement in support of economic growth</p> <p>ET3 To reduce waste)</p>		<p>positive effect upon reducing carbon emissions from transportation sources and upon improving local air quality. Conversely, growth as proposed by the Core Strategy is likely to nevertheless increase the number of cars in the Borough which would have adverse effects on sustainable travel, air quality and climate change (i.e. emissions from transport). There is a degree of uncertainty about these cumulative effects being realised as this is reliant upon travel choices of individual residents and workers (however, they do seek to encourage the use of sustainable modes of transport as far as practical).</p> <p>The delivery of Ipswich Flood Defence infrastructure will also provide benefits associated with increased resilience to climate change effects.</p> <p>All new development across the borough has the potential to result in a cumulative increase in the use of natural resources and waste generation.</p>
<p>Water resources (ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding)</p>	<p>Negative / Positive</p>	<p>New development is likely to place pressure on water resources and increase consumption of water resources. However, there is mitigation suggested within the policies to ensure sustainable design, appropriate flood risk management and sustainable (urban) drainage systems are incorporated into new development. The enhancement of the green infrastructure and ecological network across the borough will also provide benefits for infiltration and water management. Mitigation is also provided in the Core Strategy encourage measures to reduce potable demand, use of rain water harvesting and greywater recycling systems to reduce domestic water use through encouraging sustainable design.</p>



## 6 MONITORING FRAMEWORK

This section provides an outline monitoring framework and advice for monitoring the significant effects (significant effects are outlined in Table 6-1) of implementing the Core Strategy. Monitoring is an ongoing process integral to the Core Strategy implementation, and can be used to:

- Determine the performance of the plan and its contribution to objectives and targets;
- Identify the performance of mitigation measures;
- Fill data gaps identified earlier in the SA process;
- Identify undesirable sustainability effects; and
- Confirm whether sustainability predictions were accurate.

### 6.1 Requirements of the SEA Directive

The activities relevant to monitoring that are stipulated in the SEA Directive are outlined in Box 4. The outcomes of these activities are detailed in this section.

#### **Box 4: SEA Directive Requirements Applicable to Monitoring**

*“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” (Article 10.1).*

*The Environmental Report should provide information on “a description of the measures envisaged concerning monitoring” (Annex I (i)).*

### 6.2 Approach

The monitoring framework has been developed to measure the performance of the Core Strategy against changes in defined indicators that are linked to its implementation. These indicators have been developed based on the following:

- The objectives, targets and indicators that were developed for the SA Framework;
- Features of the baseline that will indicate the effects of the plan;
- The likely significant effects that were identified during the effects assessment; and
- The mitigation measures that were proposed to offset or reduce significant adverse effects.

The monitoring framework has been designed to focus mainly on significant sustainability effects including those:

- That indicate a likely breach of international, national or local legislation, recognised guidelines or standards.
- That may give rise to irreversible damage, with a view to identifying trends before such damage is caused.

- Where there was uncertainty in the SA, and where monitoring would enable preventative or mitigation measures to be taken.

As well as measuring specific indicators linked to the implementation of the Core Strategy, contextual monitoring of social, environmental and economic change has been included i.e. a regular review of baseline conditions in the borough. This enables the measurement of the overall effects of the Core Strategy.

There are numerous SA indicators available and it is not always possible to identify how a specific plan has impacted a receptor, for example housing provision is likely to be influenced by a number of actions and different plans. A thorough analysis of the data collated and the emerging trends will, therefore be important.

## 6.3 Existing Monitoring Programmes

A fundamental aspect of developing the monitoring strategy is to link with existing monitoring programmes and to prevent duplication of other monitoring work that is already being undertaken. The Ipswich AMR identifies a series of indicators that can be used to monitor progress. The proposed monitoring framework presented in Table 6-1 has also been 'tied in' with the proposed monitoring framework for the Core Strategy.

## 6.4 Proposed Monitoring Framework

Table 6-1 provides a framework for monitoring the effects of the Core Strategy and determining whether the predicted sustainability effects are realised. The framework is based around the SA Objectives and includes the following elements:

- The potentially significant impact that needs to be monitored or the area of uncertainty;
- A suitable monitoring indicator;
- A target (where one has been devised);
- The potential data source; and
- The frequency of the monitoring.

For some of the SA Objectives, for example those relating to townscape character and quality, it will be necessary for baseline characteristics and contextual information to be reviewed.

The impacts predicted in the SA will not be realised until development occurs through the Core Strategy.

Monitoring should be ongoing during the whole life of the Core Strategy. The targets identified in Table 5-1 will therefore need to be reviewed and updated as new ones are developed and existing ones modified. In addition new or more appropriate indicators may also be developed as more information is gathered and the SA process and Core Strategy further develops.

It should be noted that benefits would be realised from monitoring at different geographical scales. As this is a strategic assessment, it is important to consider the overall changes to Ipswich Borough Council as a whole, as well as considering the changes within individual settlements and the relevant local wards.

It should be noted that a number of socio-economic indicators are not measurable at the very local level. However, as this is a strategic assessment it is important to consider the overall changes to Ipswich as a whole in addition to individual settlements and changes to the local

wards. They have, therefore been included to provide a context and to understand how the Core Strategy could lead to changes across Ipswich.

Those indicators written in italics highlight current data gaps which will be reviewed and additional information gathered where possible.

Table 6-1 focuses upon indicators which are relevant to the monitoring of the likely significant effects within Ipswich as a result of the Core Strategy.

**Table 6-1 Proposed Monitoring Framework**

SA Objective	Effect to be Monitored	Indicator and Target (targets and sources are provided where relevant)	Review Timescale
<p>ET1. To improve air quality</p> <p>ET4. To reduce the effects of traffic upon the environment</p> <p>ET6. To limit and adapt to climate change</p>	<p>The Core Strategy is committed to promoting the use of sustainable transport. It would contribute to sustainable transport through the provision of housing, jobs and facilities in accessible locations which would support and encourage sustainable movement. It may also result in an increase in traffic which would have an uncertain effect on local air quality.</p>	<p><b>Access to services and facilities by public transport, walking and cycling:</b> To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031 (Ipswich Borough Council).</p> <p><b>Number and distribution of AQMAs:</b> No new AQMAs to be designated in the borough (Defra).</p> <p><b>Per capita CO<sub>2</sub> emissions in the local authority area:</b> To reduce Ipswich's estimated carbon footprint by 60% from the 2004 base level by 2025 (Ipswich Borough Council).</p> <p><b>Annual average domestic gas and electricity consumption:</b> To reduce the Annual average domestic gas and electricity consumption (DECC).</p>	<p>Every three years.</p>
<p>ET2. To conserve soil resources and quality</p>	<p>Development in the Garden Suburb will require greenfield land take which would affect the soil resource and functionality. The Core Strategy will seek to develop on brownfield land as a priority which represents a sustainable use of soil resources.</p>	<p><b>Percentage of development on previously developed land:</b> Over the plan period, 75% of major developments to take place in IP-One, District Centres or within 800m of District Centres. (Ipswich Borough Council).</p> <p><b>Area of contaminated land returned to beneficial use:</b> Target to be established (Ipswich Borough Council).</p> <p><b>Density of new residential development:</b> At least 90 dph in the town centre, Ipswich Village and Waterfront, a minimum of 40 dph around district centres and 35dph elsewhere (Ipswich Borough Council).</p> <p><b>Development on greenfield land:</b> Target to be established (Ipswich Borough Council).</p>	<p>Every three years</p>
<p>ET3. To reduce waste</p>	<p>The Core Strategy will seek to provide waste disposal and recycling facilities where possible with new development and encourage the reduction of waste. The Core Strategy will seek to minimise the amount of waste generated during construction and</p>	<p><b>Tonnage of household waste produced and recycled:</b> To recycle or compost at least 33% of household waste (Suffolk County Council).</p> <p><b>Amount of residual waste (i.e. not recycled) per household:</b> To reduce the amount of residual waste collected per household in Ipswich.</p>	<p>Annual</p>

SA Objective	Effect to be Monitored	Indicator and Target (targets and sources are provided where relevant)	Review Timescale
	through the lifetime of the buildings. However, overall waste is likely to increase due to the proposed levels of growth.		
ET5. To improve access to key services for all sectors of the population	The Core Strategy contains provisions for improving accessibility and connectivity within the borough which would meet the needs of all communities.	<b>Location of new development:</b> Over the plan period, 75% of major developments to take place in IP-One, District Centres or within 800m of District Centres. <b>Number of LSOAs with wards in bottom 10% of most deprived in terms of barriers to housing and services provision:</b> Reduce the number of wards with LSOAs in the bottom 10% most deprived in terms of barriers to housing (IMD).	Every three years
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	All development has the potential to impact upon water quality and resources and could increase flood risk in flood zone areas. The Core Strategy seeks to ensure new development incorporates water conservation, efficiency measures and SuDS where appropriate. A large portion of the proposed growth lies within Flood Zone at present.	<b>Water quality in rivers and groundwater quality:</b> Aim to achieve at least good status for all water bodies by 2015 (Environment Agency). <b>Daily domestic water use (per capita consumption, litres):</b> To increase water efficiency measures in new development (Anglian Water). <b>Number of planning applications granted permission contrary to Environment Agency advice:</b> No planning applications permitted contrary to Environment Agency advice on flooding (Ipswich Borough Council). <b>Flood and Coastal Erosion Risk Management:</b> Implementation of the tidal surge barrier by 2017 (Ipswich Borough Council).	Annual
ET8. To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	The Core Strategy seeks to conserve and enhance local biodiversity and to protect the borough's green infrastructure. It also seeks to create new open spaces and to link ecological and green corridors across Ipswich. Some development has potential to affect habitats and connectivity.	<b>Extent and condition of key habitats for which Biodiversity Action Plans have been established:</b> To maintain / enhance condition of BAP habitats. Not recorded in AMR, Where would the data be <b>Net change in extent of protected habitat:</b> No net loss of natural capacity. To increase the tree canopy cover in the borough to 22% by 2050 (Ipswich Borough Council).	Annual
ET9. To conserve and	Development built to a high quality	<b>Number of heritage assets 'at risk':</b> Six currently on this list. Target – to have none	Every five years

SA Objective	Effect to be Monitored	Indicator and Target (targets and sources are provided where relevant)	Review Timescale
enhance the historic environment, heritage assets and their settings ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	design along with heritage protection measures outlined in the Core Strategy would help to protect and enhance local townscape. Uncertain effects on some heritage assets including archaeology. Loss of open land at Garden Suburb.	on the list (English Heritage). <b>Landscape character and Conservation Area appraisals:</b> to demonstrate no deterioration in quality of landscape/townscape.	
HW1. To improve the health of those most in need HW2. To improve the quality of life where people live and encourage community participation	Provision of new open spaces, better quality housing sport and community facilities and new employment opportunities are important factors that affect health, quality of life and community participation. An increase in walking and cycling can also increase levels of health and wellbeing.	<b>Number of wards in the bottom 10% most deprived (Department for Communities and Local Government):</b> Reduce the number of wards with LSOAs in the bottom 10% most deprived (Index of Multiple Deprivation). <b>Adult participation in Sport:</b> To increase the levels of adults participating in physical activity. <b>Area of open space created through new development:</b> To increase provision.	Every three years
ER1. To reduce poverty and social exclusion	The Core Strategy promotes significant growth within Ipswich including the provision of new homes, community facilities and employment opportunities which overall could help to reduce deprivation.	<b>Proportion of population who live in wards that rank within the 10% most deprived in the country:</b> Reduce the number of wards with LSOAs in the bottom 10% most deprived (Index of Multiple Deprivation).	Every three years.
ER2. To offer everybody the opportunity for rewarding and satisfying employment	Over the plan period the creation of jobs along with economic development within accessible areas would provide the foundations to improve existing income and employment deprivation along with reducing	<b>Unemployment rate:</b> To improve Ipswich's rank in the indices of multiple deprivation by 2031 for income and employment deprivation (IMD). <b>Employment opportunities:</b> To deliver up to 12,500 jobs by 2031 (Ipswich Borough Council) <b>Average wage:</b> To increase the average wage within Ipswich. <b>Joint working taking place through the IPA Board (or other equivalent forum):</b> To	Every three years

SA Objective	Effect to be Monitored	Indicator and Target (targets and sources are provided where relevant)	Review Timescale
	unemployment within areas most at need.	achieve effective cross boundary working on housing, strategic greenspace and employment site provision.	
ER3. To help meet the housing requirements for the whole community	The Core Strategy would lead to residential development across the borough which would help widen the choice, quality and affordability of housing. The provision of 5,596 new homes to 2031 would help to meet local needs.	<p><b>Number of new dwellings achieving a minimum Level 4 Code for Sustainable Homes Standard:</b> At least 75% of new dwellings gaining planning permission in any year to achieve a minimum Level 4 Code for Sustainable Homes standard.</p> <p><b>Affordable housing provision In Ipswich and the at the Garden Suburb:</b> Ipswich Garden Suburb to provide for at least 35% on-site affordable housing and 15% elsewhere in the Borough (Ipswich Borough Council).</p> <p><b>Living environment deprivation:</b> To improve Ipswich's rank for living environment deprivation (IMD).</p> <p><b>Number of housing completions:</b> To meet local need (Ipswich Borough Council).</p> <p><b>Percentage split of dwelling types (i.e. number of 1 bed, 2 bed, 3 bed etc):</b> To meet local need (Ipswich Borough Council).</p>	Every three years
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	The Core Strategy seeks to enhance the town centre and to provide improvements to district and local centres. Enhancements and improvements would help to attract visitors, support investment would support the viability of these areas.	<p><b>Development distribution:</b> Over the plan period, 75% of major developments to take place in IP- One, District Centres or within 800m of District Centres.</p> <p><b>Take up of employment land:</b> To provide a minimum of 30ha (Ipswich Borough Council).</p> <p><b>Unemployment in Ipswich:</b> To reduce the number of people unemployed in Ipswich.</p> <p><b>No. / Percentage of vacant retail units:</b> Target to be established.</p> <p><b>Percentage of new retail floorspace developed within defined centres:</b> Target to be established.</p>	Every three years
ER6. To encourage efficient patterns of movement in support of economic growth ER7. To encourage and accommodate both indigenous and inward investment	The Core Strategy seeks to create attractive conditions for business development and economic growth focusing on those areas most in need of regeneration with elevated levels of deprivation.	<p><b>Travel to work percentage by mode:</b> To increase the proportion of the population travelling to work by sustainable transport.</p> <p><b>No. of business enquiries to Ipswich Borough Council / Suffolk County Council by types and size of site:</b> Target to be established.</p> <p><b>Employment land availability:</b> To provide a minimum of 30ha (Ipswich Borough Council).</p>	Every five years

SA Objective	Effect to be Monitored	Indicator and Target (targets and sources are provided where relevant)	Review Timescale
CL1. To maintain and improve access to education and skills for both young people and adults	The Core Strategy seeks to provide new educational facilities including new schools and extensions to existing facilities in accessible location and also to make improvements to existing facilities.	<p><b>GCSE Attainment Levels (Grades A*-C):</b> Defined target yet to be established though levels of attainment should be increased over time to match regional and national averages.</p> <p><b>Proportion of the population with no qualifications:</b> To reduce the proportion of the population with no qualifications (ONS).</p> <p><b>Pupil to teacher's ratios and percentage of community facilities within 800m of a centre:</b> Target to be developed (Ipswich Borough Council).</p>	Annual
CD1. To minimise potential opportunities for crime and antisocial activity	Provisions focused in particular within central Ipswich and the town centre have the potential to help minimise crime through regeneration benefits and security by design measures.	<p><b>Recorded crime per 1,000 population:</b> To tie in with Police targets relating to reducing crime levels by 2031 (Ipswich Borough Council).</p> <p><b>Fear of Crime (Quality of Life, Suffolk Speaks, British Crime Survey):</b> Target to be established.</p>	Annual



## 7 NEXT STEPS

The Proposed Submission Core Strategy along with the SA Report and associated appendices will be made available for public comment under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for twelve weeks from 12<sup>th</sup> December 2014 until 5th March 2015. Following the end of the consultation period the Core Strategy and accompanying documents including this SA Report will be submitted for Examination along with any comments received.

## Appendix A

---

# Review of Plans, Programmes and Environmental Protection Objectives

## International Plans and Programmes

- World Summit on Sustainable Development (WSSD), Johannesburg, September 2002
- European Sustainable Development Strategy (2006)
- EU Sixth Environmental Action Plan 2002 - 2012
- European Spatial Development Perspective (ESDP) (May 1999)
- Aarhus Convention (Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters) (1998)
- UN Framework Convention on Climate Change (1992)
- Kyoto Protocol to the UN Framework Convention on Climate Change (1997)
- Second European Climate Change Programme (ECCP II) 2005
- Directive to Promote Electricity from Renewable Energy (2001/77/EC) (as amended by 2001/77/EC, 2003/30/EC and 2009/28/EC)
- European Transport Policy for 2010: A Time to Decide
- EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC)
- Water Framework Directive (2000/60/EC)
- Drinking Water Directive (98/83/EC)
- Directive on the Assessment and Management of Flood Risks (2007/60/EC)
- UN Convention on Biological Diversity (1992)
- Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)
- Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)
- EU Birds Directive (2009/147/EC)
- Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC)
- Ramsar Convention on Wetlands of International Importance, especially as waterfowl habitat (1971)
- EU Biodiversity Strategy (1998)
- European Landscape Convention (2000)
- UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (1972)
- Waste Framework Directive (2008/98/EC)
- Packaging and Packaging Waste Directive (94/62/EC) (as amended by 2004/12/EC and 2005/20/EC)
- Urban Waste Water Treatment Directive 91/271/EEC (as amended by 98/15/EC)
- SEA Directive 2001/42/EC
- IPCC Climate Change 2014 Synthesis Report (November 2014)

## National Plans and Programmes

- UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)

- Securing the Regions' Futures – Strengthening the Delivery of Sustainable Development in the English Regions (2006)
- Sustainable Communities: Building for the Future (2003)
- Planning Act 2008
- Environmental Quality in Spatial Planning (2005)
- World Class Places: The Government's Strategy for Improving Quality of Place (2009)
- The Countryside in and Around Towns: A vision for connecting town and country in the pursuit of sustainable development (2005)
- The Code for Sustainable Homes: Setting the Standard in Sustainability for New Homes (2008)
- Sustainable Communities, Settled Homes, Changing Lives – A Strategy for Tackling Homelessness (ODPM) (2005)
- Climate Change Act (2008)
- Stern Review of the Economics of Climate Change (2006)
- UK Carbon Plan (2011)
- Climate change and biodiversity adaptation: the role of the spatial planning system – a Natural England commissioned report (2009)
- Planning for Climate Change – Guidance and Model Policies for Local Authorities (2010)
- Energy White Paper: Meeting the Energy Challenge (2007)
- Energy Act 2013
- Delivering a Sustainable Transport System (2008)
- The Future of Transport White Paper – A Network for 2030 (2004)
- Low Carbon Transport: A Greener Future - A Carbon Reduction Strategy for Transport (2009)
- Wildlife and Countryside Act (1981) (as amended 1991)
- The Conservation of Habitats and Species Regulations (2010) (as amended 2012)
- The Countryside and Rights of Way (CRoW) Act (2000)
- The Natural Environment and Rural Communities Act (2006)
- Natural Environment White Paper (HM Government, 2011)
- The Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)
- Conserving Biodiversity – The UK Approach (2007)
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)
- UK Biodiversity Action Plan (1994)
- Biodiversity by Design: A Guide for Sustainable Communities (Town and Country Planning Association) (2004)
- UK Post-2010 Biodiversity Framework 2012
- Biodiversity Indicators in Your Pocket (2013) Defra
- A Strategy for England's Trees, Woodlands and Forests (2007)

- Open Space Strategies: Best Practice Guidance (CABE and the Greater London Authority, 2009)
- Heritage in Local Plans: How to create a sound plan under the NPPF (2012)
- The Geological Conservation Review (GCR) (ongoing)
- Safeguarding our Soils: A Strategy for England (Defra, 2009)
- Natural England's Green Infrastructure Guidance (2009)
- Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation (2003) and Nature Nearby: Accessible Green Space Guidance (2010)
- Heritage White Paper: Heritage Protection for the 21st Century (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)
- Water Resources Strategy for England and Wales (2009)
- Future Water: The Government's Water Strategy for England (2008)
- Flood and Water Management Act (2010)
- Making Space for Water: Taking Forward a New Government Strategy for Flood and Coastal Erosion Risk Management (2005)
- Waste Strategy for England (2007)
- The Egan Review – Skills for Sustainable Communities (2004)
- Working for a Healthier Tomorrow – Dame Carol Black's Review of the health of Britain's working age population (2008)
- Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002
- Tackling Health Inequalities – A Programme for Action (2003, including the 2007 Status Report on the Programme for Action)
- Water for People and the Environment: A Strategy for England and Wales (2009)
- National Planning Policy Framework (2012)
- Localism Act 2011
- PPS10: Planning for Sustainable Waste Management (2005) and A Companion Guide to PPS10 (2006)
- Building for Life 12 (2012)
- Europe 2020: UK National Reform Programme 2013 (April 2013)
- Local Air Quality Management: Consultation on options to improve air quality management in England (July 2013)

## Regional and County Level Plans and Programmes

- A Sustainable Development Framework For The East Of England (2001)
- East of England Forecasting Model 2013
- Transforming Suffolk's Community Strategy 2008-2028 (2008 revision)
- Transforming Suffolk Community Strategy: Suffolk Strategic Partnership (2008)
- Inventing our Future: Collective Action for a Sustainable Economy. The Regional Economic Strategy for the East of England 2008 – 2031 (2008)

- Suffolk Growth Strategy 2013
- Minerals and Waste Development Framework: Waste Core Strategy (2011), Minerals Core Strategy 2008
- Joint Municipal Waste Management Strategy for Suffolk 2003 – 2020 (2003)
- Suffolk's Climate Action Plan 2 (2012)
- Suffolk's Local Transport Plan 2011 - 2031
- New Anglia Local Enterprise Partnership 'Towards a Growth Plan' 2013
- Expanding Suffolk's Horizons: Economic Strategy – Taking Suffolk to 2013
- East of England (LSC) Equality and Diversity Action Plan 2008
- Suffolk Haven Gateway Employment Land Review 2009
- East of England Plan for Sport (2004)
- Biodiversity Action Plan for Suffolk (Various dates)
- Water for Life and Livelihoods: River Basin Management Plan: Anglian River Basin District (2009)
- In Step with Suffolk: Right of Way Improvement Plan (2006-16)
- Leading the Way – Green Economy Pathfinder Manifesto 2012-15, New Anglia LEP
- Wild Anglia Manifesto ,September 2013, Part 1 Aims and Objectives
- Suffolk's Nature Strategy (Wild Anglia, 2014)
- Suffolk Growth Strategy March 2013
- Joint Health and Wellbeing Strategy for Suffolk (Suffolk Health and Wellbeing Board, 2013)
- Suffolk Cycling Strategy (Suffolk County Council)
- Anglian Water's Water Resources Management Plan 2015

## Local Plans and Programmes

- One-Ipswich Community Strategy 'Everybody Matters' 2008 – 2010
- Ipswich Borough Council Level 2 Strategic Flood Risk Assessment (Ipswich Borough Council, 2011)
- The Ipswich Drainage and flood defence policy (2002 with minor updates in 2009)
- Integrated Landscape Character Objectives (2010)
- Countryside Character Volume 6: East of England (1998)
- Ipswich Economic Development Strategy 2012 – 2026
- Ipswich Borough Council Corporate Plan (2012)
- Ipswich Cultural Strategy 2011-2014
- Ipswich Environment Strategy 2010
- The Ipswich Health and Wellbeing Strategy 2011 – 2016
- Ipswich Housing Strategy 2010/11-15/16
- Ipswich Town Centre Master Plan 2012
- Tree Management Policy 2010

- Allotment Strategy 2014-2020 (2005)
- Ipswich Strategic Housing Land Availability Assessment Draft Update Report (2013)
- Ipswich Housing Market Area Strategic Housing Market Assessment 2012
- Ipswich Transport Model Assessment, Aecom, 2010
- Suffolk Coastal District Council Core Strategy and Development Management Policies adopted 5th July 2013
- Mid Suffolk District Council Core Strategy Focused Review adopted December 2012
- Babergh Core Strategy and Policies 2011-2031 (2014)
- A Fairer Ipswich Equality Scheme 2012-15
- Community Cohesion Policy 2009
- Equality and Diversity policy 2010
- Homelessness Strategy 2008-13
- Ipswich Local Transport Plan (part of the Suffolk LTP, SCC 2011-2031)
- Air Quality Management Strategy
- Tourism Strategy (Ipswich Borough Council, 2004)
- Ipswich Employment Land Availability Report 2012
- Ipswich Development and Flood Risk SPD (Ipswich Borough Council, 2014)
- Haven Gateway Green Infrastructure Study (Haven Gateway Partnership, 2008)
- Open Space and Biodiversity Policy/Strategy 2013-2023 (Ipswich Borough Council, 2013)
- The Vision for Ipswich

# Summary of International Plans and Programmes

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>World Summit on Sustainable Development (WSSD), Johannesburg, September 2002</b>			
<p>The World Summit reaffirmed the international commitment to sustainable development. The aims are to:</p> <ul style="list-style-type: none"> <li>▪ Accelerate the shift towards sustainable consumption and production with a 10-year framework of programmes of action</li> <li>▪ Reverse trend in loss of natural resources</li> <li>▪ Urgently and substantially increase the global share of renewable energy</li> <li>▪ Significantly reduce the rate of loss of biodiversity by 2010</li> </ul>	<p>No specific targets or indicators, however key actions include:</p> <ul style="list-style-type: none"> <li>▪ Greater resource efficiency</li> <li>▪ Support business innovation and take up of best practice in technology and management</li> <li>▪ Waste reduction and producer responsibility</li> <li>▪ Sustainable consumer consumption and procurement</li> <li>▪ Create a level playing field for renewable energy and energy efficiency</li> <li>▪ New technology development</li> <li>▪ Push on energy efficiency</li> <li>▪ Low-carbon programmes</li> <li>▪ Reduced impacts on biodiversity</li> </ul>	<p>The plan needs to include objectives that encourage resource efficiency. The plan should recognise the importance of renewable energy and the need to reduce energy consumption and improve energy efficiency. The plan needs to include policies that encourage and contribute to the protection and enhancement of biodiversity.</p>	<p>The SA Framework should include objectives relating to renewable energy use, biodiversity protection and enhancement, and careful use of natural resources. The SA Framework should include objectives to cover the action areas. The SA Framework should include objectives, indicators and targets that address biodiversity.</p>



<b>International Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<b>European Sustainable Development Strategy (2006)</b>			
<p>The Strategy sets out how the EU will effectively live up to its long-standing commitment to meet the challenges of sustainable development. It reaffirms the need for global solidarity and the importance of strengthening work with partners outside of the EU.</p> <p>The Strategy sets objectives and actions for seven key priority challenges until 2010. The priorities are:</p> <ul style="list-style-type: none"> <li>▪ Climate change and clean energy</li> <li>▪ Sustainable transport</li> <li>▪ Sustainable consumption and production</li> <li>▪ Conservation and management of natural resources</li> <li>▪ Public Health</li> <li>▪ Social inclusion, demography and migration</li> </ul> <p>Global poverty and sustainable development challenges</p>	<p>There are no specific indicators or targets of relevance.</p>	<p>The plan needs to take on board the key objectives, actions and priorities of the Strategy and contribute to the development of more sustainable communities by creating places where people want to live and work.</p>	<p>The SA Framework should include objectives that complement those of this Strategy.</p> <p>A cross section of objectives are required that cover a number of themes.</p>
<b>EU Sixth Environmental Action Plan 2002 - 2012</b>			
<p>The EAP reviews the significant environmental challenges and provides a framework for European environmental policy up to 2012.</p> <p>The Programme aims at:</p> <ul style="list-style-type: none"> <li>▪ Emphasising climate change as an outstanding challenge of the next 10 years and beyond and contributing to the long term objective of stabilising greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system. Thus a long term objective of a maximum global temperature increase of 2°C over pre-industrial levels and a CO<sub>2</sub> concentration below 550 ppm shall guide the Programme. In the longer term this is likely to require a global reduction in emissions of greenhouse gases by 70 % as compared to 1990 as identified by the Intergovernmental Panel on Climate Change (IPCC)</li> <li>▪ Protecting, conserving, restoring and developing the functioning of natural systems, natural habitats, wild flora and fauna with the aim of</li> </ul>	<p>The Plan sets objectives and priority areas for action on tackling climate change. The aims set out in the document are to be pursued by the following objectives (some of these are now out of date and are therefore not included):</p> <ul style="list-style-type: none"> <li>▪ Fulfilment of the Kyoto Protocol commitment of an 8 % reduction in emissions by 2008-12 compared to 1990 levels for the EU as a whole, in accordance with the commitment of each Member State set out in the Council Conclusions of 16 and 17 June 1998</li> </ul> <p>Placing the Community in a credible position to advocate an international agreement on more stringent reduction targets for the second commitment period provided for by the Kyoto Protocol. This agreement should aim at cutting emissions significantly, taking full account, inter alia, of</p>	<p>The plan needs to include policies that encompass the broad goals of the EU Plan e.g. recognising that local action needs to be taken with regard to climate change issues, protecting and enhancing biodiversity and encouraging waste reduction and recycling.</p>	<p>The SA should be mindful that documents prepared will need to conform to EU goals and aims, and should therefore include appropriate objectives, indicators and targets in the SA Framework.</p>

<b>International Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<p>halting desertification and the loss of biodiversity, including diversity of genetic resources, both in the EU and on a global scale</p> <ul style="list-style-type: none"> <li>Contributing to a high level of quality of life and social well being for citizens by providing an environment where the level of pollution does not give rise to harmful effects on human health and the environment and by encouraging a sustainable urban development</li> </ul> <p>Better resource efficiency and resource and waste management to bring about more sustainable production and consumption patterns, thereby decoupling the use of resources and the generation of waste from the rate of economic growth and aiming to ensure that the consumption of renewable and non-renewable resources does not exceed the carrying capacity of the environment</p>	<p>the findings of the IPCC 3rd Assessment Report, and take into account the necessity to move towards a global equitable distribution of greenhouse gas emissions</p>		
<b>European Spatial Development Perspective (ESDP) (January 1999)</b>			
<p>The European Spatial Development Perspective is based on the EU aim of achieving balanced and sustainable development, in particular by strengthening environmentally sound economic development and social cohesion. This means, in particular, reconciling the social and economic claims for spatial development with an area's ecological and cultural functions and, hence, contributing to a sustainable, and at larger scale, balanced territorial development.</p> <p>This is reflected in the three following fundamental goals of European policy:</p> <ul style="list-style-type: none"> <li>Economic and social cohesion</li> <li>Conservation of natural resources and cultural heritage</li> </ul> <p>More balanced competitiveness of the European territory</p>	<p>There are no specific targets or indicators of relevance. Targets and measures for the most part deferred to Member States.</p>	<p>The plan needs to recognise the tensions between social, economic and environmental issues, and include policies that encourage sustainable development.</p>	<p>The SA should include objectives that complement the principles of the ESDP. Care should be taken when preparing the SA to make sure it encompasses the philosophy of both national and international strategy documents.</p>
<b>Aarhus Convention (Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters) (1998)</b>			
<p>In order to contribute to the protection of the right of every person of present and future generations to live in an environment adequate to his or her health and well-being, each Party subject to the convention shall guarantee the rights of access to information, public participation in decision-making, and access to justice in environmental matters in accordance with the provisions of this Convention.</p>	<p>As this is a high level EU policy document, responsibility for implementation has been deferred to the Member States:</p> <p>Each Party shall take the necessary legislative, regulatory and other measures, including measures to achieve compatibility between the provisions</p>	<p>The development of the Local Plan should be a transparent process.</p>	<p>The SA should ensure that enough time is provided for consultation on the SA documents.</p>

<b>International Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
	implementing the information, public participation and access-to-justice provisions in this Convention, as well as proper enforcement measures, to establish and maintain a clear, transparent and consistent framework to implement the provisions of this Convention.		
<b>UN Framework Convention on Climate Change (1992)</b>			
The convention sets an overall framework for intergovernmental efforts to tackle the challenge posed by climate change. It acknowledges that the climatic system is affected by many factors and is a shared system. Under the Convention governments have to: <ul style="list-style-type: none"> <li>▪ Gather and share information on greenhouse gas emissions</li> <li>▪ Launch national strategies for climate change</li> </ul> Co-operate in adapting to the impacts of climate change.	There are no specific targets or indicators of relevance.	The plan should recognise local action needs to be taken with regards to climate change issues.	The SA Framework should include objectives, indicators and targets that relate to climate change, flooding and the need to reduce greenhouse gas emissions.
<b>Kyoto Protocol to the UN Framework Convention on Climate Change (1997)</b>			
The Kyoto protocol, adopted in 1997, reinforced the UN Framework Convention on Climate Change. It addressed the problem of anthropogenic climate change by requiring developed countries to set legally binding emission reduction targets for greenhouse gases.	Industrial nations agreed to reduce their collective emissions of greenhouse gases by 5.2% from 1990 levels by the period 2008 to 2012. Countries can achieve their Kyoto targets by: <ul style="list-style-type: none"> <li>▪ Reducing greenhouse gas emissions in their own country</li> <li>▪ Implementing projects to reduce emissions in other countries</li> </ul> Trading in carbon. Countries that have achieved their Kyoto targets will be able to sell their excess carbon allowances to countries finding it more difficult or too expensive to meet their targets	The plan needs to include policies that encompass the broad goals of the Kyoto Protocol, e.g. recognising that local action needs to be taken with regards to climate change issues.	The SA should ensure that the Local Plan conforms to the broad goals and aims of the Kyoto Protocol and include appropriate objectives, indicators and targets in the SA Framework.
<b>Second European Climate Change Programme (ECCP II) 2005</b>			
Initiated in 2005, the programme builds on the First Climate Change Programme and seeks to continue to drive climate change mitigation across Europe, with the aim of limiting climate change and meeting Kyoto targets. It also seeks to promote adaptation to the effects of inevitable and	Most initiatives in the programme refer to EU-wide elements of policy related, for example, to emissions trading, technological specifications and carbon capture and storage.	The plan and allocations should take account of the need to understand and adapt to the potential	The SA Framework should include a target to contribute towards the mitigation and adaption

<b>International Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
predicted climate change.	There are therefore no specific targets or indicators of relevance.	impacts of climate change such as weather extremes and coastal flooding.	of the effects of climate change.
<b>IPCC Fifth Assessment Synthesis Report (November 2014)</b>			
The report demonstrates the need and strategic considerations for both adaptation and global-scale mitigation to manage risks from climate change. Building on these insights, the report presents near-term response options that could help achieve such strategic goals. Near-term adaptation and mitigation actions will differ across sectors and regions, reflecting development status, response capacities, and near- and long-term aspirations with regard to both climate and non-climate outcomes. Because adaptation and mitigation inevitably take place in the context of multiple objectives, particular attention is given to the ability to develop and implement integrated approaches that can build on co-benefits and manage trade-offs.	No specific targets or indicators are included. It's been acknowledged that many adaptation and mitigation options can help address climate change, but no single option is sufficient by itself. Effective implementation depends on policies and cooperation at all scales, and can be enhanced through integrated responses that link mitigation and adaptation with other societal objectives.	The plan and allocations should take account of the need to understand and adapt to the potential impacts of climate change such as weather extremes and coastal flooding.	The SA Framework should include a target to contribute towards the mitigation and adaption of the effects of climate change.
<b>Directive to Promote Electricity from Renewable Energy (2001/77/EC) (as amended by 2001/77/EC, 2003/30/EC and 2009/28/EC)</b>			
This Directive aims to promote an increase in the contribution of renewable energy sources to electricity production in the internal market for electricity and to create a basis for a future Community Framework.  Member States are obliged to take steps to increase the consumption of electricity produced from renewable energy sources, by setting national indicative targets, in terms of a percentage of electricity consumption by 2010.	Member States are obliged to take appropriate steps to encourage greater consumption of electricity produced from renewable energy sources in conformity with the national indicative targets.  Global indicative target: 12% of gross national energy consumption by 2010 and 22.1% indicative share of electricity produced from renewable energy sources in total Community electricity consumption by 2010.  UK target: renewables to account for 10% of UK consumption by 2010.	The plan should recognise the importance of renewable energy and the need to increase the consumption of electricity produced from renewable energy sources.	The SA Framework should include objectives to cover the action areas and encourage energy efficiency.
<b>European Transport Policy for 2010: A Time to Decide</b>			
This policy outlines the need to improve the quality and effectiveness of transport in Europe. A strategy has been proposed which is designed to gradually break the link between transport growth and economic growth to reduce environmental impacts and congestion. The policy advocates measures that promote an environmentally friendly mix of transport	There are no specific indicators or targets of relevance.	The development of the plan should consider issues relating to transport and access.	The SA Framework should include objectives relating to the need for a sustainable and efficient transport system.

**International Plans**

Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
services.			
<b>EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC)</b>			
<p>The Directive merges four previous directives and one Council decision into a single directive on air quality and may also incorporate Directive 2004/107/EC relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons at a later date. It sets binding standards and target dates for reducing concentrations of SO<sub>2</sub>, NO<sub>2</sub>/NO<sub>x</sub>, PM<sub>10</sub>/PM<sub>2.5</sub>, CO, benzene and lead which are required to be translated into UK legislation. The Directive seeks to maintain ambient-air quality where it is good and improve it in other cases.</p>	<p>Thresholds for pollutants are included in the Directives.</p>	<p>The plan should consider the maintenance of good air quality and the measures that can be taken to improve it. For example, reducing the number of vehicle movements.</p>	<p>The SA Framework should include objectives that address the protection of air quality.</p>

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Water Framework Directive (2000/60/EC)</b>			
<p>The purpose of this Directive is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater which:</p> <p>(a) prevents further deterioration and protects and enhances the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems</p> <p>(b) promotes sustainable water use based on a long-term protection of available water resources</p> <p>(c) aims at enhanced protection and improvement of the aquatic environment, inter alia, through specific measures for the progressive reduction of discharges, emissions and losses of priority substances and the cessation or phasing-out of discharges, emissions and losses of the priority hazardous substances</p> <p>(d) ensures the progressive reduction of pollution of groundwater and prevents its further pollution</p> <p>(e) contributes to mitigating the effects of floods and droughts</p>	<p>Objectives for surface waters:</p> <ul style="list-style-type: none"> <li>▪ Achievement of good ecological status and good surface water chemical status by 2015</li> <li>▪ Achievement of good ecological potential and good surface water chemical status for heavily modified water bodies and artificial water bodies</li> <li>▪ Prevention of deterioration from one status class to another</li> <li>▪ Achievement of water-related objectives and standards for protected areas</li> </ul> <p>Objectives for groundwater:</p> <ul style="list-style-type: none"> <li>▪ Achievement of good groundwater quantitative and chemical status by 2015</li> <li>▪ Prevention of deterioration from one status class to another</li> <li>▪ Reversal of any significant and sustained upward trends in pollutant concentrations and prevent or limit input of pollutants to groundwater</li> </ul> <p>Achievement of water related objectives and standards for protected areas</p>	<p>The plan should consider how the water environment can be protected and enhanced, and include policies that promote the sustainable use of water resources.</p>	<p>The SA Framework should include objectives that consider effects upon water quality and resource.</p>
<b>Drinking Water Directive (98/83/EC)</b>			
<p>Sets standards for a range of drinking water quality parameters.</p>	<p>The Directive includes standards that constitute legal limits.</p>	<p>The plan should recognise the effects of development on drinking water quality, and provide development and operational controls to prevent non-conformance with values.</p>	<p>The SA Framework should include objectives, indicators and targets that address water quality.</p>

<b>International Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<b>Directive on the Assessment and Management of Flood Risks (2007/60/EC)</b>			
<p>This Directive aims to reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity. It requires Member States to assess whether all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas, and to take adequate and coordinated measures to reduce this flood risk.</p> <p>The Directive shall be carried out in co-ordination with the Water Framework Directive, most notably through flood risk management plans and river basin management plans, and also through co-ordination of the public participation procedures in the preparation of these plans.</p>	There are no specific targets or indicators of relevance.	The plan and allocations should consider potential flood risk, and prevent development within floodplains.	The SA Framework should include objectives that promote the reduction and management of flood risk.
<b>UN Convention on Biological Diversity (1992)</b>			
<p>This was one of the main outcomes of the 1992 Rio Earth Summit. The key objectives of the Convention are:</p> <ul style="list-style-type: none"> <li>▪ The conservation of biological diversity</li> <li>▪ The sustainable use of its components</li> <li>▪ The fair and equitable sharing of the benefits arising from the use of genetic resources</li> </ul> <p>The achievement of the objectives in the Convention relies heavily upon the implementation of action at the national level.</p>	The Convention aims to halt the worldwide loss of animal and plant species and genetic resources and save and enhance biodiversity.	It is essential that the development of the plan should consider biodiversity protection.	The SA Framework should include objectives relating to the protection of biodiversity.
<b>Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)</b>			
<p>The principle objectives of the Convention are to conserve wild flora and fauna and their natural habitats, especially those species and habitats whose conservation requires the co-operation of several States, and to promote such co-operation. Particular emphasis is given to endangered and vulnerable species, including migratory species.</p> <p>In order to achieve this the Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1000 wild animal species.</p> <p>Each Contracting Party is obliged to:</p> <ul style="list-style-type: none"> <li>▪ Promote national policies for the conservation of wild flora, wild fauna</li> </ul>	There are no specific targets or indicators of relevance.	The plan must take into account the habitats and species that have been identified under the Convention, and should include provision for the preservation, protection and improvement of the quality of the environment as appropriate.	The SA Framework should take into account the conservation provisions of the Convention, including provision for the preservation and protection of the environment.

International Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>and natural habitats, with particular attention to endangered and vulnerable species, especially endemic ones, and endangered habitats, in accordance with the provisions of this Convention</p> <ul style="list-style-type: none"> <li>▪ Have regard to the conservation of wild flora and fauna in its planning and development policies and in its measures against pollution</li> <li>▪ Promote education and disseminate general information on the need to conserve species of wild flora and fauna and their habitats</li> </ul>			
<b>Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)</b>			
<p>The Convention is an <b>intergovernmental treaty</b> under the United Nations Environment Programme. The aim is for contracting parties to work together to conserve terrestrial, marine and avian migratory species and their habitats (on a global scale) by providing strict protection for endangered migratory species.</p> <p>The overarching objectives set for the Parties are:</p> <ul style="list-style-type: none"> <li>▪ Promote, co-operate in and support research relating to migratory species</li> <li>▪ Endeavour to provide immediate protection for migratory species included in Appendix I</li> </ul> <p>Endeavour to conclude Agreements covering the conservation and management of migratory species included in Appendix II</p>	There are no specific targets or indicators of relevance.	The plan must take into account the habitats and species that have been identified under this directive, and should include provision for their protection, preservation and improvement.	The SA Framework should include objectives protecting biodiversity.
<b>EU Birds Directive (2009/147/EC)</b>			
<p>The directive recognises that habitat loss and degradation are the most serious threats to the conservation of wild birds. The Directive places great emphasis on the protection of habitats for endangered as well as migratory species (listed in Annex I), especially through the establishment of a coherent network of Special Protection Areas (SPAs) comprising all the most suitable territories for these species.</p>	There are no specific targets or indicators of relevance.	The development of the plan must consider the preservation / enhancement of biodiversity resources including the protection of bird species.	The SA Framework should include sustainability objectives, indicators and targets for the preservation /enhancement of biodiversity resources.



<b>International Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<b>Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC)</b>			
Directive seeks to conserve natural habitats, and wild fauna and flora within the EU.	Member States are required to take measures to maintain or restore at favourable conservation status, natural habitats and species of Community importance. This includes Special Areas of Conservation and Special Protection Areas and it is usually accepted as also including Ramsar sites (European Sites).  Plans that may adversely affect the integrity of European sites may be required to be subject to Appropriate Assessment under the Directive.	The plan must take into account the habitats and species that have been identified under this directive, and should include provision for the preservation, protection and improvement of the quality of the environment as appropriate.	The SA should include the conservation provisions of the Directive, and include objectives that address the protection of biodiversity.  When required, a Habitats Regulations Assessment Screening exercise should be undertaken.
<b>Ramsar Convention on Wetlands of International Importance, especially as waterfowl habitat (1971)</b>			
The Convention is an intergovernmental treaty whose stated mission is 'the conservation and wise use of all wetlands through local, regional and national actions and international cooperation, as a contribution towards achieving sustainable development throughout the world' (Ramsar COP8, 2002).  There are presently 150 Contracting Parties to the Convention, with 1556 wetland sites, totalling 129.6 million hectares, designated for inclusion in the Ramsar List of Wetlands of International Importance  The original emphasis was on the conservation and wise use of wetlands primarily to provide habitat for waterbirds, however over the years the Convention has broadened its scope to incorporate all aspects of wetland conservation and wise use, recognising wetlands as ecosystems that are extremely important for biodiversity conservation and for the well-being of human communities.	There are no specific targets. Although now out of date, the general objectives of the Ramsar Strategic Plan 2003-2008 are: <ul style="list-style-type: none"> <li>▪ To ensure the wise use of wetlands</li> <li>▪ To achieve appropriate management of wetlands of international importance</li> <li>▪ To promote international co-operation</li> <li>▪ To ensure that the required implementation mechanisms, resources and capacity are in place</li> </ul> To progress towards the accession of all countries to the Convention.	The plan needs to include policies that seek to protect designated sites for nature conservation, including Ramsar sites.	The SA Framework must incorporate the overarching principals of the Convention.
<b>EU Biodiversity Strategy (1998)</b>			
The Strategy aims to anticipate, prevent and attack the causes of significant reduction or loss of biodiversity at the source, which will help	There are no specific indicators or targets of relevance.	It is essential that the development of the plan	The SA Framework should include

<b>International Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
both to reverse present trends in biodiversity decline and to place species and ecosystems, including agro-ecosystems, at a satisfactory conservation status, both within and beyond the territory of the EU.		should consider biodiversity protection.	sustainability objectives, indicators and targets that address biodiversity.
<b>European Landscape Convention (2000)</b>			
The aims are to promote European landscape protection, management and planning, and to organise European co-operation on landscape issues. The Convention is part of the Council of Europe's work on natural and cultural heritage, spatial planning, environment and local self-government, and establishes the general legal principles which should serve as a basis for adopting national landscape policies and establishing international co-operation in such matters. The UK is a signatory to this Convention and is committed to its principles.	There are no specific indicators or targets of relevance.	The plan needs to consider the preservation and enhancement of the landscape.	The SA Framework should include objectives that relate to landscape protection.
<b>UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (1972)</b>			
The Convention requires that cultural and natural heritage is identified, protected, conserved, presented and transmitted to future generations. It also requires that effective and active measures are taken to protect and conserve cultural and natural heritage.	There are no specific indicators or targets of relevance.	The plan needs to consider preservation and enhancement of cultural and natural heritage.	The SA Framework should include objectives relating to the protection of historic and natural resources.
<b>Waste Framework Directive (2008/98/EC)</b>			
This replaces the old Waste Framework Directive (2006/12/EC). The aims of this Directive are: <ul style="list-style-type: none"> <li>To provide a comprehensive and consolidated approach to the definition and management of waste.</li> <li>To shift from thinking of waste as an unwanted burden to a valued resource and make Europe a recycling society.</li> <li>To ensure waste prevention is the first priority of waste management.</li> </ul> To provide environmental criteria for certain waste streams, to establish when a waste ceases to be a waste (rather than significantly amending the definition of waste).	There are no specific targets or indicators of relevance.	The plan should seek to promote the key objectives of prevention, recycling and processing of waste, conversion of waste to usable materials, and energy recovery.	The SA needs to incorporate objectives, indicators and targets that address waste issues, e.g. minimisation and re-use etc.
<b>Packaging and Packaging Waste Directive (94/62/EC) (as amended by 2004/12/EC and 2005/20/EC)</b>			
This Directive covers all packaging placed on the market in the Community	The Directive states that Member States must introduce	Although this Directive	The SA Framework

Strategic Environmental Assessment and Sustainability Appraisal —Proposed Submission Core Strategy and Development Management Policies Document

Hyder Consulting (UK) Limited-2212959

\\ipswich\ibc\planning and development\spar\local plan oct 2012 onwards\regulation 19 documents\publication versions\core strategy\sustainability appraisals\proposed submission core strategy dpd sustainability appraisal.docx

<b>International Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
and all packaging waste, whether it is used or released at industrial, commercial, office, shop, service, household or any other level, regardless of the material used. The Directive provides that the Member States shall take measures to prevent the formation of packaging waste, which may include national programmes and may encourage the reuse of packaging.	systems for the return and/or collection of used packaging to attain certain targets. However, all targets are now out of date and are therefore not included.	dictates national legislation, the plan should encourage better waste management.	should be consistent with the waste management principles of this policy.
<b>Urban Waste Water Treatment Directive 91/271/EEC (as amended by 98/15/EC)</b>			
This Directive concerns the collection, treatment and discharge of urban waste water and the treatment and discharge of waste water from certain industrial sectors. Its aim is to protect the environment from any adverse effects caused by the discharge of such waters.	The Directive establishes a timetable, which Member States must adhere to, for the provision of collection and treatment systems for urban waste water in agglomerations corresponding to the categories laid down in the Directive. However, all deadlines have since passed and are therefore not included.	The plan should seek to promote the appropriate collection, treatment and discharge of urban wastewater to protect the environment.	The SA needs to incorporate objectives, indicators and targets that complement those of this strategy.
<b>SEA Directive 2001/42/EC</b>			
The directive concerns the SEA procedure, which is as follows: an environmental report is prepared in which the likely significant effects on the environment and the reasonable alternatives of the proposed plan or programme are identified. The public and the environmental authorities are informed and consulted on the draft plan or programme and the environmental report prepared. As regards plans and programmes which are likely to have significant effects on the environment in another Member State, the Member State in whose territory the plan or programme is being prepared must consult the other Member State(s). On this issue the SEA Directive follows the general approach taken by the SEA Protocol to the UN ECE Convention on Environmental Impact Assessment in a Transboundary Context.	There are no specific targets or indicators of relevance.	The plan is required to be subject to SEA under the SEA Directive.	An SEA will be undertaken on the plan.

# Summary of National Plans and Programmes

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)</b>			
<p>The strategy for sustainable development aims to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations.</p> <p>As a result of the 2004 consultation to develop new UK sustainable development strategy the following issues have been highlighted as the main priority areas for immediate action:</p> <ul style="list-style-type: none"> <li>▪ Sustainable consumption and production - working towards achieving more with less</li> <li>▪ Natural resource protection and environmental enhancement - protecting the natural resources on which we depend</li> <li>▪ From local to global: building sustainable communities creating places where people want to live and work, now and in the future</li> <li>▪ Climate change and energy - confronting the greatest threat</li> </ul> <p>In addition to these four priorities changing behaviour also forms a large part of the Governments thinking on sustainable development.</p>	<p>Because the UK sustainable development strategy aims to direct and shape policies, it is difficult to list the objectives of the strategy within the confines of the table. The following principles will be used to achieve the sustainable development purpose, and have been agreed by the UK Government, Scottish Executive, Welsh Assembly Government, and the Northern Ireland Administration:</p> <ul style="list-style-type: none"> <li>▪ Living within environmental limits</li> <li>▪ Ensuring a strong, healthy, and just society</li> <li>▪ Achieving a sustainable economy</li> <li>▪ Promoting good governance</li> <li>▪ Using sound science responsibly</li> </ul> <p>There are no specific targets within the Strategy, although it makes reference to targets set in related PSA and other relevant policy statements.</p> <p>There are also 68 high level UK Government strategy indicators, which will be used to measure the success with which the above objectives are being met. The most relevant are:</p> <ul style="list-style-type: none"> <li>▪ <b>Greenhouse gas emissions:</b> Kyoto target and CO<sub>2</sub> emissions</li> <li>▪ <b>CO<sub>2</sub> emissions by end user:</b> industry, domestic, transport (excluding international aviation), other</li> <li>▪ <b>Renewable electricity:</b> renewable electricity generated as a % of total electricity</li> <li>▪ <b>Energy supply:</b> UK primary energy supply and gross inland energy consumption</li> <li>▪ <b>Water resource use:</b> total abstractions from non-tidal surface and ground water sources</li> </ul>	<p>The plan needs to take on board the key objectives of the strategy and contribute to the development of more sustainable communities by creating places where people want to live and work.</p>	<p>The SA Framework should include objectives, indicators and targets that complement those of this strategy.</p>

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	<ul style="list-style-type: none"> <li>▪ <b>Waste arisings</b> by (a) sector (b) method of disposal</li> <li>▪ <b>Bird populations:</b> bird population indices (a) farmland birds (b) woodland birds (c) birds of coasts and estuaries (d) wintering wetland birds</li> <li>▪ <b>Biodiversity conservation:</b> (a) priority species status (b) priority habitat status</li> <li>▪ <b>River quality:</b> rivers of good (a) biological (b) chemical quality</li> <li>▪ <b>Air quality and health:</b> (a) annual levels of particles and ozone (b) days when air pollution is moderate or higher</li> </ul>		
Securing the Regions' Futures – Strengthening the Delivery of Sustainable Development in the English Regions (2006)			
<p>This document sets out the Government's approach to strengthening the delivery of sustainable development at the regional level, following the publication of 'Securing the Future: The UK Sustainable Development Strategy'.</p> <p>The five guiding principles and four priorities set out in the UK Sustainable Development Strategy provide the framework within which the English regions work to improve quality of life. This document sets out an additional 20 commitments (with clear guidance) in order to help regions make a step change in their contribution to delivering sustainable development. The key elements of this approach are:</p> <ul style="list-style-type: none"> <li>▪ Using the sustainable development priorities and principles to underpin the refreshed or updated high-level regional strategies</li> <li>▪ Creating a strengthened role for regional sustainable development roundtables as champion bodies</li> <li>▪ Maximising the contribution which city-regions, sub-regions and inter-regional strategies can make to delivering sustainable development through innovative ways of working at these levels</li> <li>▪ Embedding sustainable development within the work of Government Offices and across their organisations and operations so as to become exemplars in the regions</li> <li>▪ Supporting the role of Regional Assemblies in delivering sustainable development through all their functions</li> </ul>	There are no specific indicators or targets of relevance.	The plan needs to consider sustainable development through its detailed guidance.	This plan is primarily concerned with delivery of sustainable development at the regional level. While not all elements are of relevance to this study, ensuring sustainable development in the English regions is essential, and should be considered through the SA process.

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<ul style="list-style-type: none"> <li>Working with Regional Development Agencies (RDAs) to help them deliver economic productivity, which delivers sustainable development at the same time - and to ensure that this contribution is fully reflected in RDA assessments</li> </ul> <p>This document provides an enabling framework within which the regions themselves can devise their own sustainable solutions to meet their needs and which are in line with the wider UK goals on sustainable development. It helps demonstrate the Government's commitment to empowering regions in order that they can secure a sustainable future for their own communities, and one which helps us meet our sustainable development goals in the UK as a whole.</p>			
<b>Sustainable Communities: Building for the Future (2003)</b>			
<p>This action programme marks a step change in the policies for delivering sustainable communities for all. The plan allies measures to tackle the housing provision mis-match between the South-East and parts of the North and the Midlands, with more imaginative design and the continuation of an agreeable and convenient environment.</p> <p>It is part of the Government's wider drive to raise the quality of life in our communities through increasing prosperity, reducing inequalities, increasing employment, better public services, better health and education, tackling crime and anti-social behaviour, and much more. It reflects our key principles for public service reform: raising standards, devolving and delegating decision-making, providing greater flexibility over use of resources and choice for customers. The main elements are:</p> <ul style="list-style-type: none"> <li>Sustainable communities</li> <li>Step change in housing supply</li> <li>New growth areas</li> <li>Decent homes</li> </ul> <p>Countryside and local environment</p>	There are no specific indicators or targets of relevance.	<p>The plan should encourage housing to be addressed by local partnerships as part of a wider strategy of neighbourhood renewal and sustainable communities.</p> <p>It should also encourage environmental enhancement to be central to regeneration solutions, including the use of green space networks as a basis for development and have due regard for landscape character and designations.</p>	<p>The SA should acknowledge local action to meet local needs.</p> <p>It should recognise that housing should be provided for all sections of society.</p> <p>It should recognise that environmental improvements can improve quality of life</p> <p>The SA Framework should be reviewed against these objectives.</p>
<b>Planning Act 2008</b>			
<p>The Act created amendments to the functioning of the planning system, following recommendations from the Barker Review first proposed in the 2007 White Paper: Planning for a Sustainable Future. The two principal</p>	There are no specific targets or indicators of relevance.	The preparation of the plan should consider the recommended actions in	The SA should consider the means by which the measures in the Act may enable the plan to

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<p>changes are:</p> <ul style="list-style-type: none"> <li>The establishment of an Infrastructure Planning Commission to make decisions on nationally significant infrastructure projects.</li> </ul> <p>Creation of the Community Infrastructure Levy, a charge to be collected from developers by local authorities for the provision of local and sub-regional infrastructure.</p>		this document.	contribute towards sustainable development
<b>Environmental Quality in Spatial Planning 2005</b>			
This document was jointly published by The Countryside Agency, English Heritage, English Nature and the EA. It provides guidance to help in the preparation of Regional Spatial Strategies and Local Development Frameworks, by ensuring incorporation of the natural, built and historic environment, and rural issues in plans and strategies.	There are no specific targets or indicators of relevance.	The preparation of the plan should consider the recommended actions in this document.	The SA should take into consideration the issues raised in this document and ensure that an appropriate suite of objectives is developed, covering relevant aspects of the built and natural environment.
<b>World Class Places: The Government's Strategy for Improving Quality of Place (2009)</b>			
<p>The Strategy identifies the benefits of creating well-designed places, including elements of spatial planning, urban design, architecture, green infrastructure and community involvement. It seeks to promote the consideration of place at all levels of planning. An Action Plan accompanying the Strategy sets out the following seven broad objectives</p> <p>1: Strengthen leadership on quality of place at the national and regional level</p> <p>2: Encourage local civic leaders and local government to prioritise quality of place</p> <p>3: Ensure relevant government policy, guidance and standards consistently promote quality of place and are user-friendly</p> <p>4: Put the public and community at the centre of place-shaping</p> <p>5: Ensure all development for which central government is directly responsible is built to high design and sustainability standards and promotes quality of place</p> <p>6: Encourage higher standards of market-led development</p>	<p>The majority of actions reflect how the Government will take forward the strategy and use it in the creation of new guidance and to direct its interactions with relevant agencies. However, of particular relevance are:</p> <p>2.3: Working with local authorities to achieve high quality development</p> <p>2.5: Establishing an award scheme for high quality places</p> <p>4.1: Encouraging public involvement in shaping the vision for their area and the design of individual schemes</p> <p>4.2: Ensuring the citizens and service users are engaged in the design and development of public buildings</p> <p>4.3: Encouraging community involvement in ownership and managing the upkeep of the public realm and community facilities</p> <p>4.4: Promoting public engagement in creating new</p>	The plan should seek to reinforce and promote a sense of place. High standards of design and public consultation should be encouraged.	The SA Framework should recognise the importance of developing a high quality built environment and promoting high levels of community involvement.

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
7: Strengthen quality of place skills, knowledge and capacity	homes and neighbourhoods 6.1: Encouraging local authorities to set clear quality of place ambitions in their local planning framework 7.1: Strengthening advisory support on design quality for local authorities, the wider public sector and developers 7.2: Encouraging local authorities to share planning, design, conservation and related expertise		
<b>The Countryside in and Around Towns: A vision for connecting town and country in the pursuit of sustainable development (2005)</b>			
This document was jointly published by the Countryside Agency and Groundwork, in 2005.  The document presents a new vision for a very extensive and often overlooked resource – the countryside in and around England’s towns and cities. The vision at the heart of the challenge to reduce the pressures that urban life places on the local and global environment is, <i>‘the need to ensure a high quality of life for all while at the same time reducing our collective impact on the resources we share’</i> .	There are no specific targets or indicators of relevance.	The plan needs to complement the aims of the strategy and seek to develop sustainable communities.	The SA Framework should include objectives, indicators and targets that seek to promote sustainable communities.
<b>The Code for Sustainable Homes: Setting the Standard in Sustainability for New Homes (2008)</b>			
This document sets out the assessment process and the performance standards required for the Code for Sustainable Homes. The Code is a voluntary standard designed to improve the overall sustainability of new homes by setting a single framework within which the home building industry can design and construct homes to higher environmental standards.	The Code measures the sustainability of new homes in 9 categories: <ul style="list-style-type: none"> <li>▪ Energy and CO<sub>2</sub> Emissions</li> <li>▪ Pollution</li> <li>▪ Water</li> <li>▪ Health and Wellbeing</li> <li>▪ Materials</li> <li>▪ Management</li> <li>▪ Surface Water Run-off</li> <li>▪ Ecology</li> </ul> Waste	The plan should consider the requirements of the Code.	SA Objectives should be developed to reflect the categories of the code.
<b>Sustainable Communities, Settled Homes, Changing Lives – A Strategy for Tackling Homelessness (ODPM) (2005)</b>			



<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<p>The strategy aims to halve the number of households living in insecure temporary accommodation by 2010. This will be achieved by:</p> <ul style="list-style-type: none"> <li>▪ Preventing homelessness</li> <li>▪ Providing support for vulnerable people</li> <li>▪ Tackling the wider causes and symptoms of homelessness</li> <li>▪ Helping more people move away from rough sleeping</li> <li>▪ Providing more settled homes</li> </ul> <p>For each of the above points a series of actions are identified.</p>	<p>Key target: Halve the number of households living in temporary accommodation by 2010</p>	<p>The plan should understand the causes of homelessness and seek to include guidance that includes homes to meet the needs of the local population.</p>	<p>The SA Framework should include objectives that address housing issues including homelessness.</p>
<b>Climate Change Act (2008)</b>			
<p>The Act commits the UK to action in mitigating the impacts of climate change. It has two key aims:</p> <ul style="list-style-type: none"> <li>▪ To improve carbon management, helping the transition towards a low-carbon economy</li> </ul> <p>To demonstrate UK leadership internationally, signalling a commitment to take our share of responsibility for reducing global emissions in the context of developing negotiations on a post-2012 global agreement at Copenhagen in December 2009 [and beyond].</p>	<p>Relevant commitments within the Act are:</p> <ul style="list-style-type: none"> <li>▪ The creation of a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050, to be achieved through action in the UK and abroad (against 1990 levels). Also a reduction in emissions of at least 34% by 2020.</li> <li>▪ A carbon budgeting system which caps emissions over five-year periods, to aid progress towards the 2050 target.</li> <li>▪ The creation of the Committee on Climate Change - a new independent, expert body to advise the Government on the level of carbon budgets and on where cost-effective savings can be made.</li> <li>▪ The inclusion of International aviation and shipping emissions in the Act or an explanation to Parliament why not - by 31 December 2012.</li> <li>▪ Further measures to reduce emissions, including: powers to introduce domestic emissions trading schemes more quickly and easily through secondary legislation; measures on biofuels; powers to introduce pilot financial incentive schemes in England for household waste; powers to require a minimum charge for single-use carrier bags</li> </ul>	<p>The plan should ensure that policies are in place to encourage the reduction in CO<sub>2</sub> emissions whilst promoting sustainable economic growth.</p>	<p>The SA Framework should include objectives that address climate change issues including flooding and the need to reduce greenhouse gas emissions.</p>

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
	(excluding Scotland). <ul style="list-style-type: none"> <li>New powers to support the creation of a Community Energy Savings Programme.</li> </ul>		
<b>Stern Review of the Economics of Climate Change (2006)</b>			
The review examines the evidence on the economic impacts of climate change and explores the economics of stabilising greenhouse gases in the atmosphere. The second part of the review considers the complex policy challenges involved in managing the transition to a low-carbon economy and in ensuring that societies are able to adapt to the consequences of climate change.  The document clearly identifies that adaptation is the only available response for impacts that will occur over the next few decades.	There are no specific targets or indicators of relevance.	The plan should ensure that policies are in place to encourage the reduction in CO <sub>2</sub> emissions whilst promoting sustainable economic growth.	The SA Framework should include an objective relating to the reduction in greenhouse gas emissions.
<b>UK Carbon Plan (2011)</b>			
The Carbon Plan sets out the Government's plans for achieving the emissions reductions committed to in the first four carbon budgets, on a pathway consistent with meeting the UK's 2050 target. The publication brings together the Government's strategy to curb greenhouse gas emissions and deliver climate change targets.	The Carbon Plan includes the following targets: Commitment to reduce carbon emissions by at least 80% by 2050.	It should be ensured that reducing carbon emissions is a key theme throughout the plan.	The SA Framework should include objectives that complement the priorities of this Plan.
<b>Climate change and biodiversity adaptation: the role of the spatial planning system – a Natural England commissioned report (2009)</b>			
The report examines ways in which the land use planning system can help biodiversity adapt to climate change. Strategies are identified that enable LDFs to deliver against the Department for Food, Environment and Rural Affairs' (Defra) 12 core adaptation goals: 1. Conserve existing biodiversity 1a Conserve protected areas and other high quality habitats 1b Conserve range and ecological variability of habitats and species 2 Reduce sources of harm not linked to climate 3 Develop ecologically resilient and varied landscapes 3a Conserve and enhance local variation within sites and habitats 3b Make space for the natural development of rivers and coasts 4 Establish ecological networks through habitat protection, restoration	There are no specific targets or indicators of relevance.	Development of the plan should include recommendations from this report. Biodiversity assets should be protected from inappropriate development and i.e. use of buffer zones around sensitive sites.	The SA should refer to specific guidance in the document for using SA to improve the ability of biodiversity to adapt to climate change.

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<p>and creation</p> <p>5 Make sound decisions based on analysis</p> <p>5a Thoroughly analyse causes of change</p> <p>5b Respond to changing conservation priorities</p> <p>6 Integrate adaptation and mitigation measures into conservation management, planning and practice</p>			
<b>Planning for Climate Change – Guidance and Model Policies for Local Authorities (2010)</b>			
<p>The document has been produced by the Planning and Climate Change Coalition, a group of organisations seeking to ensure that the planning system responds effectively to the climate challenge.</p> <p>The guide is designed to provide clarity and guidance to local authorities and Local Enterprise Partnerships on how best to plan for climate change, both in terms of reducing CO<sub>2</sub> emissions, and adapting to future climatic conditions.</p> <p>Guidance is provided on developing both strategic and development control policies.</p>	<p>There are no specific targets or indicators of relevance, other than to support local authorities in mitigating and adapting to climate change.</p>	<p>The guidance should be followed when developing Local Plan in order to address climate change issues.</p>	<p>The SA should examine the likely effectiveness of the plan in mitigating and adapting to climate change. Such judgements should be made with reference to the guidance.</p>
<b>Energy White Paper: Meeting the Energy Challenge (2007)</b>			
<p>This White Paper sets out a framework for action to address the following long-term energy challenges, and helps to manage the risks:</p> <ul style="list-style-type: none"> <li>▪ Tackling climate change by reducing CO<sub>2</sub> emissions both within the UK and abroad</li> <li>▪ Ensuring secure, clean and affordable energy as we become increasingly dependent on imported fuel</li> </ul> <p>As set out in ‘The Energy Challenge’ published in 2006, the context in which the Government is seeking to meet these challenges is evolving.</p> <p>This paper sets out the Government’s international and domestic energy strategy (based upon existing policies) to address the long-term energy challenges and deliver the four energy policy goals [set out in the 2003 Energy White Paper]. It sets out how the Government is implementing the measures in the Energy Review Report in 2006 together with other measures announced since (e.g. in the 2007 Budget).</p>	<p>Targets are superseded by 2008 Climate Change Act. There is therefore none of relevance.</p>	<p>The plan should encourage the reduction in CO<sub>2</sub> emissions whilst promoting sustainable economic growth.</p>	<p>The SA Framework should include an objective relating to the reduction in greenhouse gas emissions.</p>
<b>Energy Act 2013</b>			

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<p>The Act sets out new legislation to:</p> <ul style="list-style-type: none"> <li>Reflect the availability of new technologies (such as CCS and emerging renewable technologies)</li> <li>Correspond with our changing requirements for security of supply infrastructure (such as offshore gas storage)</li> <li>Ensure adequate protection for the environment and the tax payer as our energy market changes.</li> </ul>	There are no specific targets or indicators of relevance.	The plan should ensure that policies are in place to encourage the reduction in CO <sub>2</sub> emissions whilst promoting sustainable economic growth.	The SA Framework should include an objective relating to minimising greenhouse gas emissions.
<b>Delivering a Sustainable Transport System (2008)</b>			
<p>The document explains how the strategic aims set out in 'Towards a Sustainable Transport System' (2007) will be translated into policy and practical actions. It takes on recommendations contained in the Eddington transport study and the Stern Review. The 5 goals are:</p> <ul style="list-style-type: none"> <li>To support national economic competitiveness and growth, by delivering reliable and efficient transport networks;</li> <li>To reduce transport's emissions of CO<sub>2</sub> and other greenhouse gases, with the desired outcome of tackling climate change;</li> <li>To contribute to better safety, security and health and longer life expectancy by reducing the risk of death, injury or illness arising from transport, and by promoting travel modes that are beneficial to health;</li> <li>To promote greater equality of opportunity for all citizens, with the desired outcome of achieving a fairer society; and</li> </ul> <p>To improve quality of life for transport users and non-transport users, and to promote a healthy natural environment.</p>	The document does not contain specific targets or indicators, but rather sets out broad strategic priorities at a national level. Nonetheless, the goals provide a framework for local as well as national action.	The plan should recognise the importance of safe, reliable and efficient transport systems to economic and social wellbeing. The sustainability impacts of transport should also be fully understood.	The SA Framework should ensure inclusion of objectives that promote sustainable transport.
<b>The Future of Transport White Paper – A Network for 2030 (2004)</b>			
<p>This Paper builds on the progress that has already been made since the implementation of the 10 Year Plan for transport, and sets out the vision for transport for the next 30 years, until 2015, with a funding commitment. It is a long term strategy for a modern, efficient and sustainable transport system backed up by sustained high levels of investment.</p> <p>The aim is for a transport network that can meet the challenges of a growing economy and the increasing demand for travel, but that can also achieve environmental objectives. This means coherent networks with:</p>	<p>The document indicates a number of Public Service Agreement objectives. Those of relevance include;</p> <ul style="list-style-type: none"> <li>Reduce greenhouse gas emissions to 12.5% below 1990 levels in line with our Kyoto commitment and move towards a 20% reduction in CO<sub>2</sub> emissions below 1990 levels by 2010, through measures including energy efficiency and renewables.</li> </ul> <p>Improve air quality by meeting the Air Quality Strategy targets for carbon monoxide, lead, nitrogen</p>	The plan should recognise the need for an integrated and sustainable transport network.	The SA Framework should contain objectives that support an efficient and sustainable transport system, and also cover issues relating to the protection of air quality and greenhouse gas

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<ul style="list-style-type: none"> <li>▪ The road network providing a more reliable and freer-flowing service for both personal travel and freight, with people able to make informed choices about how and when they travel</li> <li>▪ The rail network providing a fast, reliable and efficient service, particularly for interurban journeys and commuting into large urban areas</li> <li>▪ Reliable, flexible, convenient bus services tailored to local needs</li> <li>▪ Making walking and cycling a real alternative for local trips</li> <li>▪ Ports and airports providing improved international and domestic links</li> </ul> <p>The strategy is built around three key themes:</p> <ul style="list-style-type: none"> <li>▪ Sustained investment over the long term</li> <li>▪ Improvements in transport management</li> <li>▪ Planning ahead sustained</li> </ul> <p>Underlining these themes, and an important underlying objective of our strategy, is balancing the need to travel with the need to improve quality of life. This means seeking solutions that meet long term economic, social and environmental goals. Achieving this objective will contribute to the objectives of the UK Sustainable Development Strategy.</p>	<p>dioxide, particles, sulphur dioxide, benzene and 1,3 butadiene.</p>		<p>emissions.</p>
<b>Low Carbon Transport: A Greener Future - A Carbon Reduction Strategy for Transport (July 2009)</b>			
<p>The Strategy sets out how the transport sector will meet its emissions reduction obligations and contribute to the Government's overall policy on climate change as set out in the Climate Change Act 2008.</p>	<p>The Strategy does not contain its own targets; rather it sets out how those committed to elsewhere, notably in the Climate Change Act 2008, will be met by the transport sector and what actions the Government will take to see they are met.</p>	<p>The plan should promote low-carbon transport. This may require the use of new and emerging technology as well as promoting a modal shift in transport choices.</p>	<p>The SA should seek the promotion of low-carbon forms of transport.</p>
<b>Wildlife and Countryside Act (1981) (as amended)</b>			
<p>The Act still forms the basis of conservation legislation in Great Britain, although it has been much modified.</p> <p>Schedules 5 and 8 of the Act detail lists of legally protected wild animals and plants respectively. These are updated every five years.</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The plan must ensure that the requirements of the Act are complied with and that species and habitats are protected.</p>	<p>The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.</p>

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<b>The Conservation of Habitats and Species Regulations (2010)</b>			
The purpose of the Act is to create a new statutory right of access on foot to certain types of open land, to modernise the public rights of way system, to strengthen nature conservation legislation, and to facilitate better management of Areas of Outstanding Natural Beauty (AONBs).	There are no specific targets or indicators of relevance.	It is essential that the development of the plan should consider biodiversity protection.	The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.
<b>The Countryside and Rights of Way (CRoW) Act (2000)</b>			
The purpose of the Act is to create a new statutory right of access on foot to certain types of open land, to modernise the public rights of way system, to strengthen nature conservation legislation, and to facilitate better management of Areas of Outstanding Natural Beauty (AONBs).	There are no specific targets or indicators of relevance.	It is essential that the development of the plan should consider biodiversity protection.	The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.
<b>The Natural Environment and Rural Communities Act (2006)</b>			
<p>The act created Natural England and the Commission for Rural Communities and, amongst other measures, it extended the biodiversity duty set out in the Countryside and Rights of Way (CROW) Act to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity.</p> <p>The Duty is set out in Section 40 of the Act, and states that every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.</p> <p>The aim of the biodiversity duty is to raise the profile of biodiversity in England and Wales, so that the conservation of biodiversity becomes properly embedded in all relevant policies and decisions made by public authorities.</p> <p>The Duty applies to all local authorities, community, parish and town councils, police, fire and health authorities and utility companies.</p> <p>The Government has produced guidance on implementing the Duty, contained in two publications, one for Local Authorities (and the other for other public bodies).</p> <p>Section 41 of the NERC Act 2006, lists species and habitats of principal importance that local authorities must have regard for.</p>	There are no specific targets or indicators of relevance.	It is essential that the development of the plan considers the provisions of the biodiversity duty.	The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>The Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)</b>			
This guidance was issued by Defra and the Welsh Assembly to assist local authorities in fulfilling their Biodiversity Duty.	<p>The guidance references a biodiversity indicator, which was developed as a result of a Defra commissioned research project in 2003/4. The indicator developed to measure local authority performance is:</p> <p>'Progress towards achieving a local authority's potential for biodiversity', which is based on four sub-indicators relating to:</p> <ul style="list-style-type: none"> <li>▪ The management of local authority landholdings (e.g. % of landholdings managed to a plan which seeks to maximise the sites' biodiversity potential.</li> <li>▪ The condition of local authority managed SSSIs (e.g. % of SSSI in 'favourable' or 'unfavourable recovering' condition).</li> <li>▪ The provision of accessible greenspace.</li> <li>▪ The effect of development control decisions on designated sites (e.g. change in designated sites as a result of planning permissions).</li> </ul>	It is essential that the development of the plan considers the provisions of the biodiversity duty.	The SA Framework should include objectives relating to the protection and enhancement of biodiversity resources.

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Conserving Biodiversity – The UK Approach (2007)</b>			
<p>The purpose of the document is to set out the vision and approach to conserving biodiversity within the UK’s devolved framework. It sets out an approach to biodiversity conservation that is designed to meet the commitment to halt the loss of biodiversity by 2010 but also to guide action into the second decade of the 21<sup>st</sup> century.</p> <p>The statement emphasises an ecosystem approach. There is a close relationship between ecosystems and human well-being and there is a need to take action to reverse ecosystem degradation by addressing the key drivers and valuing ecosystem services. There is a need to maintain, create and restore functional combinations of habitats.</p> <p>The shared priorities for action are:</p> <ul style="list-style-type: none"> <li>▪ Protecting the best sites for wildlife</li> <li>▪ Targeting action on priority species and habitats</li> <li>▪ Embedding proper consideration of biodiversity and ecosystem services in all relevant sectors of policy and decision-making.</li> <li>▪ Engaging people and encouraging behaviour change</li> <li>▪ Developing and interpreting the evidence base</li> </ul> <p>Ensuring that the UK plays a proactive role in influencing the development of Multilateral Environmental Agreements and contributes fully to their domestic delivery.</p>	<p>In June 2007 the UK Biodiversity Partnership published 18 indicators that can be used to monitor biodiversity progress across the UK. They will be used as part of a wider evidence base to determine whether the target to halt biodiversity loss is being achieved. Some of the relevant indicators include:</p> <ul style="list-style-type: none"> <li>▪ Trends in populations of selected species of birds and butterflies</li> <li>▪ UK BAP Priority Species &amp; Habitats</li> <li>▪ Protected areas</li> <li>▪ Sustainable woodland management</li> <li>▪ Area of agri-environment land</li> <li>▪ Sustainable fisheries</li> <li>▪ Ecological impact of air pollution</li> <li>▪ Invasive species</li> <li>▪ Habitat connectivity</li> </ul> <p>River quality</p>	<p>It is essential that the development of the plan should consider biodiversity protection.</p>	<p>The SA Framework should include objectives relating to the protection of biodiversity resources.</p>
<b>Biodiversity 2020: A strategy for England’s wildlife and ecosystem services (2011)</b>			
<p>This new, ambitious biodiversity strategy for England builds on the Natural Environment White Paper and provides a comprehensive picture of how we are implementing our international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes)5 and at sea. It builds on the successful work that has gone before, but also seeks to deliver a real step change.</p> <p>The mission for this strategy, for the next decade, is:</p> <ul style="list-style-type: none"> <li>• To halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.</li> </ul>	<p>The document sets out 5 strategic goals which include targets in which flexible framework is given to inform the establishment of national plans, taking into account national circumstances and priorities.</p> <ul style="list-style-type: none"> <li>• Strategic goal A: address the underlying causes of biodiversity loss by mainstreaming biodiversity cross government and society</li> <li>• Strategic goal B: reducing the direct pressures on biodiversity and promote sustainable use</li> </ul>	<p>It is essential that the development of the plan should consider biodiversity protection.</p>	<p>The SA Framework should include objectives relating to the protection of biodiversity resources</p>



National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	<ul style="list-style-type: none"> <li>• Strategic goal C: improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity</li> <li>• Strategic goal D: enhance the benefits to all from biodiversity and ecosystem services</li> <li>• Strategic goal E :enhance implementation through participatory planning, knowledge management and capacity building</li> </ul>		
UK Biodiversity Action Plan (1994)			
<p>This Plan has been prepared in response to Article 6 of the Biodiversity Convention, to develop national strategies for the conservation of biological diversity and the sustainable use of biological resources. The Action Plan is monitored, reviewed and updated when required.</p> <p>The overall goal of the UKBAP is '<i>To conserve and enhance biological diversity within the UK and to contribute to the conservation of global biodiversity through all appropriate mechanisms</i>'.</p> <p>Its underlying principles are:</p> <ul style="list-style-type: none"> <li>▪ Where biological resources are used, such use should be sustainable</li> <li>▪ Wise use should be ensured for non-renewable resources</li> <li>▪ The conservation of biodiversity requires the care and involvement of individuals and communities as well as Governmental processes</li> <li>▪ Conservation of biodiversity should be an integral part of Government programmes, policy and action</li> <li>▪ Conservation practice and policy should be based upon a sound knowledge base</li> <li>▪ The precautionary principle should guide decisions</li> </ul> <p>The objectives for conserving biodiversity are:</p> <ul style="list-style-type: none"> <li>▪ To conserve and where practicable to enhance: <ul style="list-style-type: none"> <li>a. the overall populations and natural ranges of native species and the quality and range of wildlife habitats and ecosystems</li> <li>b. internationally important and threatened species, habitats and ecosystems</li> </ul> </li> </ul>	<p>The plan contains 1150 species and 65 habitats that have been listed as priorities for conservation action under the UK Biodiversity Action Plan (UK BAP).</p> <p>Specific targets are established for each of these action plans which are considered too detailed for this PPP review.</p>	<p>It is essential that the development of the plan should consider biodiversity protection.</p>	<p>The SA Framework should include objectives relating to the protection of biodiversity resources.</p>

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<p>c. species, habitats and natural and managed ecosystems that are characteristic of local areas</p> <p>d. the biodiversity of natural and semi-natural habitats where this has been diminished over recent past decades</p> <ul style="list-style-type: none"> <li>▪ To increase public awareness of, and involvement in, conserving biodiversity.</li> </ul> <p>To contribute to the conservation of biodiversity on a European and global scale.</p>			
<b>Biodiversity by Design: A Guide for Sustainable Communities (Town and Country Planning Association) (2004)</b>			
<p>The aim of the guide is to provide guidance on how to maximise the opportunities for biodiversity in the planning and design of sustainable communities. The guidance is designed to apply at a variety of scales from whole sub-region growth points, to neighbourhood schemes.</p>	<p>This is a guidance document and therefore does not set targets or identify indicators.</p>	<p>The plan should recognise the multi-functional nature of open space. The plan should seek to protect and enhance biodiversity resources and open space.</p>	<p>The SA Framework should seek to protect European, national and locally designated sites along with areas of open space.</p>
<b>UK Post-2010 Biodiversity Framework 2012</b>			
<p>This framework was produced to set out the common purpose and shared priorities of members to address biodiversity loss and decline in the UK.</p>	<p>The document sets out four key strategic targets:</p> <ul style="list-style-type: none"> <li>• Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society. This goal includes targets for public awareness, integrating biodiversity</li> <li>• Reduce the direct pressures on biodiversity and promote sustainable use.</li> <li>• To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity.</li> </ul> <p>Enhance the benefits to all from biodiversity and ecosystems.</p>	<p>The plan should recognise the importance of arresting biodiversity decline and aim to protect and enhance it.</p>	<p>The SA should contain objectives relating to arresting biodiversity loss/decline.</p>

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<b>Biodiversity Indicators in Your Pocket (2010) Defra</b>			
These indicators show changes in aspects of biodiversity such as the population size of important species or the area of land managed for wildlife. They provide part of the evidence to assess whether the targets set out in the following column have been achieved.	<p>The UK Government committed to two important international targets to protect biodiversity:</p> <ol style="list-style-type: none"> <li>1. In 2001, European Union Heads of State or Government agreed that biodiversity decline should be halted, with the aim of reaching this objective by 2010.</li> <li>2. In 2002, Heads of State at the United Nations World Summit on Sustainable Development committed themselves to achieve, by 2010, a significant reduction of the current rate of biodiversity loss at the global, regional and national level, as a contribution to poverty alleviation and to the benefit of all life on Earth.</li> </ol> <p>There are eighteen UK biodiversity indicators grouped under six focal areas aligned to those used by the Convention on Biological Diversity:</p> <ol style="list-style-type: none"> <li>1. Status and trends in components of biodiversity</li> <li>2. Sustainable use</li> <li>3. Threats to biodiversity</li> <li>4. Ecosystem integrity and ecosystem goods and services</li> <li>5. Status of resource transfers and use</li> <li>6. Public awareness and participation</li> </ol>	The plan should include indicators relating to biodiversity in order to monitor progress.	The SA Framework should include objectives relating to biodiversity and the quality of the natural environment.
<b>A Strategy for England's Trees, Woodlands and Forests (2007)</b>			
The strategy has a 10 – 15 year timescale and strives to achieve sustainable forest management.	There are no specific targets or indicators of relevance.	It is essential that the development of the plan	The SA Framework should include objectives

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<p>There are five aims identified for Government intervention in trees, woods and forests. The aims are:</p> <ul style="list-style-type: none"> <li>▪ To provide a resource of trees, woods and forests where they can contribute most in terms of environmental, economic and social benefits now and in the future.</li> <li>▪ To ensure that existing and newly-planted trees, woods and forests are resilient to the impacts of climate change and also contribute to the way in which biodiversity and natural resources adjust to climate change.</li> <li>▪ To protect and enhance the environmental resources of water, soil, air, biodiversity and landscapes and the cultural and amenity values of trees and woodland.</li> <li>▪ To increase the contribution that trees, woods and forests make to the quality of life for those living, working and visiting England.</li> </ul> <p>To improve the competitiveness of woodland businesses and to promote new or improved markets for sustainable woodland products.</p>		should consider biodiversity protection.	relating to the protection of biodiversity resources, which includes areas of woodland, particularly ancient woodland.
<b>Open Space Strategies: Best Practice Guidance (CABE and the Greater London Authority, 2009)</b>			
This document offers clear, practical guidance to local authorities and their stakeholders on how to prepare an open space strategy.	There are no specific targets or indicators of relevance.	The plan should recognise the multi-functional benefits of open space.	The SA should consider the potential for impacts on open spaces and opportunities for enhancements.
<b>Heritage in Local Plans: How to create a sound plan under the NPPF (2012)</b>			
This document is a guide to local authorities from English Heritage on how to achieve the objectives of the NPPF for the historic environment and thereby pass the test for a sound local plan.	This is an advisory document and does not set targets or identify indicators.	The plan should accommodate the guidance of this document relating to heritage in local planning.	The SA framework should seek to take on the advice of this document in regards to heritage in local planning.
<b>The Geological Conservation Review (GCR) (ongoing)</b>			
The GCR is designed to identify sites of national and international importance needed to show all the key scientific elements of the Earth heritage of Britain. They display sediments, rocks, fossils, and features of the landscape that make a special contribution to our understanding and	There are no specific targets or indicators of relevance.	The plan should recognise the status of GCR sites in the borough and aim to protect this and other	The SA should consider potential impacts on geodiversity.

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
appreciation of Earth science and the geological history of Britain		geodiversity sites.	
<b>Safeguarding our Soils: A Strategy for England (Defra, 2009)</b>			
<p>Vision: By 2030, all England's soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations.</p> <p>The Strategy sets out how Government intends to improve the management of soil to manage threats to its quality and integrity.</p>	There are no specific targets or indicators of relevance.	The plan should include measures to ensure that soils are protected in line with the Strategy's aims. In addition the protection of valuable soil resources should be promoted within the plan.	The assessment should consider the extent to which soils may be impacted by proposals supported within the plan.
<b>Natural England's Green Infrastructure Guidance (2009)</b>			
The guidance outlines the benefits of developing multi-functional green infrastructure. It provides advice to local authorities on how to deliver green infrastructure improvements through the planning system, including reference to LDFs.	There are no specific targets or indicators of relevance.	The plan should protect existing green infrastructure and promote new multi-functional green spaces. Guidance should be followed where possible.	The assessment should consider the impact of plan on the quality and quantity of green infrastructure and the extent to which the guidance has been followed.
<b>Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation (2003) and Nature Nearby: Accessible Green Space Guidance (2010)</b>			
These publications by Natural England explain and give guidance on the concept of Accessible Natural Green Space Standards (ANGSt). The 2010 report provides practical advice to planning authorities on meeting the standards within new and existing developments.	<p>ANGSt recommends that everyone, wherever they live, should have an accessible natural greenspace:</p> <ul style="list-style-type: none"> <li>▪ of at least 2ha in size, no more than 300m (5 minutes walk) from home;</li> <li>▪ at least one accessible 20ha site within 2km of home;</li> <li>▪ one accessible 100ha site within 5km of home; and</li> <li>▪ one accessible 500ha site within 10km of home; plus a minimum of 1ha of statutory Local Nature Reserves per thousand population.</li> </ul>	The plan should attempt to ensure that the standards are met within the borough.	The SA Framework should contain an objective relating to the provision of green space.

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<b>Heritage White Paper: Heritage protection for the 21<sup>st</sup> century (2007)</b>			
<p>This White Paper responds to the public call for change, and to this changing policy context. It sets out our vision for a new heritage protection system. Our proposals are based on a unified vision of the historic environment that enables a simpler and more efficient system. They are focussed on opening up heritage protection to greater public scrutiny and involvement. And they recognise that heritage protection needs to be an integral part of a planning system that can deliver sustainable communities.</p>	<p>The proposals in this White Paper reflect the importance of the heritage protection system in preserving our heritage for people to enjoy now and in the future. They are based around three core principles:</p> <ul style="list-style-type: none"> <li>• Developing a unified approach to the historic environment;</li> <li>• Maximising opportunities for inclusion and involvement; and</li> <li>• Supporting sustainable communities by putting the historic environment at the heart of an effective planning system.</li> </ul>	<p>The plan will need to take on board the issues and themes that have been identified in the document.</p>	<p>The SA Framework should include objectives that relate to the protection and enhancement of the historic environment.</p>
<b>The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)</b>			
<p>The Strategy sets out air quality objectives and policy options to further improve air quality in the UK to deliver environmental, health and social benefits.</p> <p>It examines the costs and benefits of air quality improvement proposals, the impact of exceedances of the strategy's air quality objectives, the effect on ecosystems and the qualitative impacts.</p>	<p>The Strategy sets objectives and targets for each air quality pollutant, e.g. to achieve and maintain 40µg/m-3 of annual average nitrogen dioxide.</p>	<p>The plan should consider the maintenance of good air quality and the measures that can be taken to improve it. For example, promotion of Green Travel Plans.</p>	<p>The SA Framework should include objectives that address the protection of air quality.</p>
<b>Water Resources Strategy for England and Wales (2009)</b>			
<p>This is a strategy produced by the Environment Agency (EA) and applies to both England and Wales. It forms the EA's strategy for water resource management for the next 25 years.</p> <p>The focus of the strategy is understanding the present state of water resources and planning for the management of water resources to prevent long-term environmental damage and degradation. The strategy highlights where water abstractions are unsustainable and where further water is needed. The issue of climate change and its impact upon our water</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The plan needs to consider the protection and enhancement of water resources.</p>	<p>The SA Framework should include objectives that promote the protection of the water environment.</p>

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
resources is also considered. 30 action points are identified to deliver the strategy, which include developing leakage control, encouraging good practice when using water and promoting the value of water.			
<b>Future Water: The Government's Water Strategy for England (2008)</b>			
<p>Defra's vision for the state of the water environment in 2030 is for:</p> <ul style="list-style-type: none"> <li>▪ an improved quality of the water environment and the ecology which it supports, and continued high levels of drinking water quality;</li> <li>▪ sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water;</li> <li>▪ sustainable use of water resources, and implemented fair, affordable and cost reflective water charges;</li> <li>▪ reduced greenhouse gas emissions; and</li> <li>▪ an embedded continuous adaptation to climate change and other pressures across the water industry and water users.</li> </ul>	<p>The Strategy contains few quantitative targets. It sets out broad ambitions for improvements in the areas of water demand, supply, quality, surface water drainage, flooding, greenhouse gas emissions, water charging and the regulatory framework.</p> <p>One headline target is to reduce per capita consumption of water to an average of 130 litres per person per day by 2030, or possibly even 120 litres per person per day depending on new technological developments and innovation.</p>	<p>The plan should help to support the aims of this Strategy through requiring high levels of protection for the water environment.</p>	<p>The SA Framework should contain objectives related to water resources, flooding and climate change.</p>
<b>Flood and Water Management Act (2010)</b>			
<p>The Act will provide better, more comprehensive management of coastal erosion and flood risk for people, homes and businesses. It also contains financial provisions related to the water industry.</p> <p>The Act will give the EA an overview of all flood and coastal erosion risk management and unitary and county councils the lead in managing the risk of local floods. It will also enable better management of water resources and quality, and will help to manage and respond to severe weather events such as flood and drought.</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The plan should consider flood risk issues. It should seek to avoid siting new development in floodplain and ensure the sustainable use of water resources.</p>	<p>The SA Framework should include objectives, targets and indicators that address flooding risk and the need to manage run-off effectively.</p>

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<b>Making Space for Water: Taking Forward a New Government Strategy for Flood and Coastal Erosion Risk Management (2005)</b>			
<p>This strategy has a 20 year time horizon and seeks to implement a more holistic strategy to flood and coastal erosion risks.</p> <p>The aim is to manage risks by employing an integrated portfolio of approaches which reflect both national and local priorities to reduce the threat to people and their property and to deliver the greatest environmental, social and economic benefits</p> <p>A whole catchment and whole shoreline approach will be adopted and adaptation to climate change will be an inherent part of flood and coastal erosion decisions.</p>	<p>There are no specific targets or indicators of relevance.</p>	<p>The plan needs to ensure that development in floodplains is discouraged.</p>	<p>The SA Framework should include objectives, targets and indicators that address flooding risk and the need to manage runoff effectively.</p>
<b>Waste Strategy for England (2007)</b>			
<p>The aim has to be to reduce waste by making products with fewer natural resources. The link between economic growth and waste growth must be broken. Most products should be re-used or their materials recycled. Energy should be recovered where possible. Land filling of residual waste, in small amounts, may be necessary.</p> <p>The strategy highlights that significant progress has been made since the 2000 strategy. However, performance still lags behind other European countries.</p> <p>The Government's key objectives are:</p> <ul style="list-style-type: none"> <li>▪ To decouple waste growth from economic growth and put more emphasis upon waste prevention and re-use.</li> <li>▪ Meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste in 2010, 2013 and 2020.</li> <li>▪ Increase diversion from landfill of non-municipal waste and secure better integration of treatment for municipal and non-municipal waste.</li> <li>▪ Secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste.</li> </ul> <p>Get the most environmental benefit from investment through increased recycling of resources and recovery of energy from residual waste using a mix of technologies.</p>	<p>The strategy includes targets for reducing household waste production but these are not relevant to this PPP review.</p> <p>The strategy expects a reduction of commercial and industrial waste going to landfill by at least 20% by 2010 compared to 2004.</p> <p>A number of indicators are used in the strategy to characterise current waste management in England.</p>	<p>The plan should seek to ensure sustainable waste management.</p>	<p>The SA Framework should include objectives, indicators and targets that address sustainable waste management issues.</p>



National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>The Egan Review – Skills for Sustainable Communities (2004)</b>			
<p><i>“Sustainable communities meet the diverse needs of existing and future residents, their children and other users, contribute to a high quality of life and provide opportunity and choice. They achieve this in ways that make effective use of natural resources, enhance the environment, promote social cohesion and inclusion and strengthen economic prosperity.”</i></p> <p>The key components of sustainable communities are:</p> <ul style="list-style-type: none"> <li>▪ Governance – effective and inclusive participation, representation and leadership.</li> <li>▪ Transport and connectivity – Good transport services and communications linking people to jobs, schools, health and other services.</li> <li>▪ Services – a full range of appropriate, accessible public, private community and voluntary services.</li> <li>▪ Environmental – providing places for people to live in an environmentally friendly way.</li> <li>▪ Economy – A flourishing and diverse local economy.</li> <li>▪ Housing and the Built Environment – a quality built and natural environment</li> </ul> <p>Social and cultural – vibrant, harmonious and inclusive communities.</p>	<p>A series of indicators are defined for each of the key components to monitor progress. These include:</p> <ul style="list-style-type: none"> <li>▪ % of population who live in wards that rank within the most deprived 10% and 25% of wards in the country.</li> <li>▪ % of residents surveyed and satisfied with their neighbourhoods as a place to live.</li> <li>▪ % of respondents surveyed who feel they ‘belong’ to the neighbourhood (or community).</li> <li>▪ Domestic burglaries per 1000 households and % detected.</li> <li>▪ % of adults surveyed who feel they can influence decisions affecting their local area.</li> <li>▪ Household energy use (gas and electricity) per household.</li> <li>▪ % people satisfied with waste recycling facilities.</li> <li>▪ Average no. of days where air pollution is moderate or higher for NO<sub>2</sub>, SO<sub>2</sub>, O<sub>3</sub>, CO or PM<sub>10</sub>.</li> <li>▪ No. of unfit homes per 1,000 dwellings.</li> <li>▪ % of listed building of Grade I and II* at risk of decay.</li> <li>▪ % of residents surveyed finding it easy to access key local services.</li> <li>▪ % of people of working age in employment (with BME breakdown).</li> <li>▪ Average life expectancy.</li> </ul> <p>No. of primary care professionals per 100,000 population.</p>	<p>The plan should include policies that support the principles of the Egan Review and seek to develop sustainable communities.</p>	<p>There are a number of objectives and indicators in the document that should be integrated into the SA Framework.</p>

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Working for a Healthier Tomorrow – Dame Carol Black’s Review of the health of Britain’s working age population (2008)</b>			
<p>This Review sets out the first ever baseline for the health of Britain’s working age population, seeking to lay the foundations for urgent and comprehensive reform through a new vision for health and work in Britain. Three principles lie at the heart of this vision:</p> <ul style="list-style-type: none"> <li>▪ Prevention of illness and promotion of health and well-being</li> <li>▪ Early intervention for those who develop a health condition</li> <li>▪ An improvement in the health of those out of work so that everyone with the potential to work has the support they need to do so</li> </ul> <p>The Review recognises the human, social and economic costs of impaired health and well-being in relation to working life in Britain. The aim of the Review is not to offer a utopian solution for improved health in working life, but more to identify the factors that stand in the way of good health and to elicit interventions (including services, changes in attitudes, behaviours and practices) that can help to overcome them.</p> <p>Monitoring the baseline presented in this Review will be critical, together with a research programme to inform future action with a comprehensive evidence base and increased cross-governmental effort to ensure progress.</p>	<p>Although there are no relevant targets within the Review, it presents a number of indicators of working age health, which include:</p> <ul style="list-style-type: none"> <li>▪ Life expectancy</li> <li>▪ Mortality during working age</li> <li>▪ % of the working age population being in good, fairly good or poor health</li> <li>▪ Proportion of people out of work due to sickness or disability</li> <li>▪ Sickness absence per annum</li> <li>▪ Sickness notes issued per medical condition</li> <li>▪ % of working time lost due to sickness</li> <li>▪ Proportion of the working age population on incapacity benefits</li> <li>▪ Employment rate</li> <li>▪ Employment rate for disabled people</li> <li>▪ Income rates</li> <li>▪ Economic inactivity and reasons for inactivity, split into those inactive who would like to work and those seeking work</li> <li>▪ Proportion of deviation from perfect health by social class (Quality Adjusted Life Year (QALY) health measure) and work status</li> <li>▪ Proportion of adult population who smoke</li> <li>▪ Work related illness by industry</li> <li>▪ Proportion of working age population with mental health conditions</li> <li>▪ Incapacity benefits claimants by primary medical condition</li> </ul> <p>Costs of working age ill health</p>	<p>The plan should consider issues relating to human health.</p>	<p>The SA Framework should include objectives that seek to protect human health and reduce health inequalities.</p>

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<b>Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002</b>			
<p>The 2001/2 Report and its update seek to provide quantitative estimates of the possible impacts of climate change on health. It is recognised that there could be significant long-term health effects as a result of climate change.</p> <p>Since the original report, the assessment of future climate change has been updated. A new generation of high-resolution climate models has allowed for improved estimates of future changes in the frequency, intensity and duration of extreme events in the UK. Some of the major areas of concern are:</p> <ul style="list-style-type: none"> <li>▪ Flooding</li> <li>▪ Vector-borne diseases</li> <li>▪ Food-borne diseases</li> <li>▪ The effects of climate change on drinking water supplies</li> <li>▪ The direct effects of high temperatures</li> <li>▪ The air pollution climate</li> </ul> <p>Exposure to ultra-violet light</p>	<p>A number of indicators are presented in this Report. The key ones include:</p> <ul style="list-style-type: none"> <li>▪ Mean annual temperature</li> <li>▪ Number of days per year with daily mean exceeding 20°C</li> <li>▪ Number of days per year with daily mean below 0°C</li> <li>▪ Annual total rainfall</li> <li>▪ Seasonal rainfall</li> <li>▪ Maximum daily wind speed</li> <li>▪ Annual highest maximum daily wind speed</li> </ul> <p>Annual cases of malaria</p>	<p>The plan should address the issues relating to climate change, and the need to encourage provision of high quality and flexible health services.</p>	<p>The SA Framework should include objectives that address climate change issues including flooding and the need to reduce greenhouse gas emissions. It should also include an objective related to human health.</p>
<b>Local Air Quality Management – Consultation on options to improve air quality management in England (July 2013)</b>			
<p>The consultation document was prepared by Defra and it aims to improve local air quality management. It recognises that local authorities have an important part to play in helping to improve air quality and in working towards EU standards. This includes coordinating local assessment and action; taking air quality into account when undertaking transport functions, ensuring the planning system is deployed to limit deterioration of air quality (or exposure) and where possible to improve air quality and promote the public health benefits of good air quality.</p>	<p>Local Air Quality Objectives are presented in Annex 1 of this consultation document:</p> <ul style="list-style-type: none"> <li>▪ Nitrogen Dioxide (NO<sub>2</sub>) - 200 µg/m<sup>3</sup> (not to be exceeded more than 18 times a year – 1 hour mean</li> <li>▪ Particles (PM<sub>10</sub>) – 50 µg/m<sup>3</sup> not to be exceeded more than 35 times a year – 24 hour mean</li> <li>▪ Sulphur Dioxide – 350 µg/m<sup>3</sup> not to be exceeded more than 24 times a year – 1 hour mean</li> </ul>	<p>The plan should address the issues relating to air quality, and the need to encourage sustainable travel modes, e.g. walking, cycling, public transport.</p>	<p>The SA Framework should include objectives that address air quality issues. It should also include an objective related to human health.</p>
<b>Tackling Health Inequalities – A Programme for Action 2003 (Including the 2007 Status Report on the Programme for Action)</b>			
<p>This Programme for Action was prepared by the Department of Health, setting out plans for the following three years to tackle health inequalities</p>	<p>The Programme for Action presents a number of national headline indicators that can be attributed to health</p>	<p>The plan should consider issues relating to human</p>	<p>The SA Framework should include objectives</p>

National Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>that are found across different geographical areas, between genders and different ethnic communities and also between different social and economic groups. It established the foundations required to achieve the challenging national target to reduce the gap in infant mortality across social groups, and raise life expectancy in the most disadvantaged areas faster than elsewhere, by 2010.</p> <p>The programme was organised around four themes:</p> <ul style="list-style-type: none"> <li>Supporting families, mothers and children – to ensure the best possible start in life and break the inter-generational cycle of health</li> <li>Engaging communities and individuals – to ensure relevance, responsiveness and sustainability</li> <li>Preventing illness and providing effective treatment and care – making certain that the NHS provides leadership and makes the contribution to reducing inequalities that is expected of it</li> <li>Addressing the underlying determinants of health – dealing with the long-term underlying causes of health inequalities</li> </ul> <p>These themes are underpinned by discrete principles to guide how health inequalities are tackled in practice.</p> <p>The programme sets out an ambitious agenda including targets and milestones, in order to help to reduce inequalities by progressing against the 2010 national target and also tackling the underlying causes in the future.</p>	<p>inequality, including the following:</p> <ul style="list-style-type: none"> <li>Number of primary care professionals per 100,000 population</li> <li>Road accident casualties in disadvantaged communities</li> <li>Proportion of children living in low-income households</li> <li>Proportion of those aged 16 who get qualifications equivalent to 5 GCSEs at grades A* to C</li> <li>Proportion of households living in non-decent housing</li> <li>Prevalence of smoking among people in manual social groups, and among pregnant women</li> </ul> <p>Age-standardised death rates per 100,000 population for the major killer diseases (cancer, circulatory diseases), ages under 75 (for the 20% of areas with the highest rates compared to the national average)</p>	health.	that seek to protect human health and reduce health inequalities.
Water for People and the Environment: A Strategy for England and Wales (2009)			
<p>This strategy sets out how the Environment Agency believe water resources should be managed throughout England and Wales to 2050 and beyond to ensure that there will be enough water for people and the environment.</p>	<p>This Strategy includes many targets from other plans and policies including:</p> <p>The Housing Green Paper, 13 published in July 2007, set new long term housing targets for England – to provide two million homes by 2016 and three million homes by 2020.</p> <ul style="list-style-type: none"> <li>The food industry has committed to reduce water consumption by 20 per cent by 2020.</li> <li>The Carbon Reduction Commitment aims to reduce carbon dioxide emissions by four million tonnes per year by 2020, helping achieve reduction targets</li> </ul>	<p>The plan should consider how the water environment can be protected and enhanced, and include policies that promote the sustainable use of water resources.</p>	<p>The SA Framework should include objectives that consider effects upon water quality and resource.</p>

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
	<p>outlined in the Climate Change Act.</p> <ul style="list-style-type: none"> <li>▪ The UK has a green energy target of 15 per cent by 2020.</li> <li>▪ The Government in England has set a target for its own departments to achieve a 30 per cent reduction in their carbon emissions by 2020. The Environment Agency has set themselves a target to achieve this reduction by 2012.</li> </ul> <p>The England and Wales annual target of saving water is 23 MI/d.</p>		
<b>National Planning Policy Framework March 2012</b>			
<p>The National Planning Policy Framework sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.</p> <p>The Government aims to achieve sustainable development through:</p> <ul style="list-style-type: none"> <li>▪ Building a strong, competitive economy</li> <li>▪ Ensuring the vitality of town centres</li> <li>▪ Supporting a prosperous rural economy</li> <li>▪ Promoting sustainable transport</li> <li>▪ Supporting high quality communications infrastructure</li> <li>▪ Delivering a wide choice of high quality homes</li> <li>▪ Requiring good design</li> <li>▪ Promoting healthy communities</li> <li>▪ Protecting green belt land</li> <li>▪ Meeting the challenge of climate change, flooding and coastal change</li> <li>▪ Conserving and enhancing the natural environment</li> <li>▪ Conserving and enhancing the historic environment</li> <li>▪ Facilitating the sustainable use of minerals</li> </ul>	There are no specific targets or indicators of relevance.	The plan should adhere to the principles of the Planning Policy Framework ensuring that all aspects of the core land-use planning principles underpin the Local Plan.	The SA Framework should include objectives relating to economic, environmental and social issues.
<b>Localism Act 2011</b>			

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<p>The Localism Act contains a number of proposals to give local authorities new freedoms and flexibility shifting power from the central state. In summary the Act gives:</p> <ul style="list-style-type: none"> <li>▪ New freedoms and flexibilities for local government; <ul style="list-style-type: none"> <li>- Gives local authorities everywhere the formal legal ability and greater confidence to get on with the job of responding to what local people want</li> <li>- Cuts red tape to enable councillors everywhere to play a full and active part in local life without fear of legal challenge</li> <li>- Encourages a new generation of powerful leaders with the potential to raise the profile of English cities, strengthen local democracy and boost economic growth</li> <li>- Enables ministers to transfer functions to public authorities in cities in order to harness their potential to drive growth and prosperity</li> </ul> </li> <li>▪ New rights and powers for local communities <ul style="list-style-type: none"> <li>- Makes it easier for local people to take over the amenities they love and keep them part of local life</li> <li>- Ensures that local social enterprises, volunteers and community groups with a bright idea for improving local services get a chance to change how things are done</li> <li>- Enables local residents to call local authorities to account for the careful management of taxpayers' money</li> </ul> </li> <li>▪ Reform to make the planning system clearer, more democratic and more effective <ul style="list-style-type: none"> <li>- Places significantly more influence in the hands of local people over issues that make a big difference to their lives</li> <li>- Provides appropriate support and recognition to communities who welcome new development</li> <li>- Reduces red tape, making it easier for authorities to get on with the job of working with local people to draw up a vision for their area's future</li> <li>- Reinforces the democratic nature of the planning system - passing power from bodies not directly answerable to the public, to democratically accountable ministers</li> </ul> </li> </ul>	<p>There are no specific targets or indicators of relevance.</p>	<p>The plan should be mindful of the key principles of this Act.</p>	<p>The SA Framework should be mindful of this Act as its principles will help to create vibrant, cohesive and empowered communities.</p>

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<ul style="list-style-type: none"> <li>▪ Reform to ensure that decisions about housing are taken locally               <ul style="list-style-type: none"> <li>- Enables local authorities to make their own decisions to adapt housing provision to local needs, and make the system fairer and more effective</li> <li>- Gives local authorities more control over the funding of social housing, helping them to plan for the long term</li> <li>- Gives people who live in social housing new ways of holding their landlords to account, and make it easier for them to move</li> </ul> </li> </ul>			
<b>PPS10: Planning for Sustainable Waste Management (Revised March 2011)</b>			
<p>Positive planning has an important role in delivering sustainable waste management through the development of appropriate strategies for growth, regeneration and the prudent use of resources, and by providing sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time.</p> <p>The PPS and the accompanying guidance sets out Government advice to local authorities on the role they should play in supporting national waste planning and policy and ensuring that greater local responsibility is taken for minimising waste and promoting sustainable waste management. The concerns of local groups should be considered when siting sensitive waste management facilities.</p>	There are no specific targets or indicators of relevance.	The waste policy elements of the plan need to be developed in accordance with national policy.	The SA Framework should include objectives that promote sustainable waste management.
<b>Building for Life 12 (2012)</b>			
This document provides the standard for well-designed homes and neighborhoods which local communities, local authorities and developers can utilise to stimulate conversations about creating good places to live. The document comprises 12 questions split over three categories to establish the quality of the project.	<p>Although not strict targets, the aim is for buildings to gain as many 'green lights' to 12 questions in three key areas:</p> <ul style="list-style-type: none"> <li>• Integrating into the neighbourhood</li> <li>• Creating a place</li> <li>• Street and home</li> </ul>	The plan should be mindful of recommendation in the document how to improve homes, neighbourhoods and communities.	The SA should include objectives around generating buildings, neighbourhoods and communities which flourish
<b>Europe 2020: UK National Reform Programme 2013 (April 2013)</b>			
The Programme sets out actions that the government is taking to address the structural reform challenges facing the UK, in line with a set of Country Specific Recommendations agreed by Heads of State or government at the European Council in June 2012. The NRP summarises relevant new	<p>The document provides a progress update and puts forward overarching aims for the UK going forward around five key areas:</p> <ul style="list-style-type: none"> <li>• Employment</li> </ul>	The plan should be aware of the key strategies put forward by this document and endeavour to	The SA should include objectives around improvement in the five key areas outlined in this

<b>National Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
announcements and reports on the impact of policies already implemented. It documents reports on progress in broad policy areas covered by five headline EU-level targets under the Europe 2020 Strategy, relating to employment, education, poverty reduction, research and innovation, and energy and climate change.	<ul style="list-style-type: none"> <li>• Education</li> <li>• Poverty reduction</li> <li>• Research and innovation</li> <li>• Climate Change</li> </ul>	incorporate those relevant within it.	document.



# Summary of Regional, County and Local Plans and Programmes

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>A Sustainable Development Framework For The East Of England (2001)</b>			
<p>Sets out the vision for the East England, which aims to improve the quality of life for people in the region which is sustainable in the long term future.</p> <p>To achieve sustainable levels of prosperity and economic growth.</p> <p>To deliver more sustainable patterns of location of development, including employment and housing.</p> <p>To protect and maintain most valuable regional assets such as designated habitats, landscapes of natural beauty, and our historic built heritage, and to improve the wider environment by means of adequate investment and management.</p> <p>To reduce our consumption of fossil fuels.</p> <p>To achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region.</p> <p>To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible.</p> <p>To minimise the production of by-products or wastes, aiming for 'closed systems' where possible.</p> <p>To avoid using the global environment to underwrite an unsustainable way of life (e.g. dependence on unsustainably produced and/or transported food imports or timber).</p>	<p>1) Adoption of Environmental Management Systems (EMS) and 'Green Accounting' by businesses</p> <p>2) New homes built on previously developed land Number of vacant properties cycle, bus, passenger rail, rail freight Traffic congestion Availability of affordable housing, attractive streets and buildings.</p> <p>3) Populations of wild birds Area of semi-natural habitat lost to development Area of new semi-natural habitat created Wildlife sites affected by water abstraction Loss/damage to Sites of Special Scientific Interest (SSSIs) Species at risk Buildings of Grade I and II* at risk of decay Changes in landscape features - woodland, hedges, stone walls and ponds Area of ancient semi-natural woodland</p> <p>4) Output of greenhouse gas and particularly CO<sub>2</sub> Weather-related insurance claims Regional energy consumption compared with population and GDP Energy use per household Proportion of electricity generated from renewable sources Economic health and prospects of energy industry, including off-shore</p>	<p>The plan objectives and policies need to be broadly compatible with the priorities and long term goals of the plan.</p>	<p>The SA Framework should be compatible with this framework. Objectives should be consistent with the overarching RSDf objectives, and include issues covering growth, natural resources, social progress, protection of the environment etc.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
To revitalise town centres to promote a return to sustainable urban living.	Proportion of total travel which is by car Transport's share of region's CO2 emissions Freight transport: tonne/miles and empty lorry miles Air quality improvements measured against related illnesses Tourism by mode of transport <b>5)</b> Proportion of housing unfit or lacking appropriate insulation, by area Availability of public services - transport, shops, banks etc by area <b>6)</b> Household water use and peak demand Low flows in rivers Margin between water supply and projected demand % of water lost to leakage Area under agri-environment schemes Area converted to organic production Concentration of organic matter in agricultural top-soils Volumes of minerals produced in the region Level of minerals and aggregate use replaced by recycled or substitute materials Number of exhausted mineral sites returned to suitable use Construction and demolition waste going to landfill Imported mineral tonnage Numbers of dwellings created by re-use of existing buildings Number of buildings designed to sustainability principles <b>7)</b> Levels of wastes and emissions (nutrients, pesticides, herbicides) Household waste and recycling Rivers of good or fair quality Proportion of water needs met by local water recycling in urban and		

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	rural areas Compliance with Bathing Water Directive Concentrations of persistent organic pollutants Air quality - number of days per year any parameter exceeds its National Standard <b>8)</b> Percentage of food, timber, and raw materials used in the region which is imported from unsustainable sources Percentage of food consumed in the region that is produced locally Number of farmers markets, and local trading schemes <b>9)</b> Vacant land and properties and derelict land Proportion of new retail in town centres versus out-of-town Proportion of population living in town centres Access to local green space Quality of surroundings Noise levels Rates of fear of crime % households stating their neighbourhood has 'community spirit'		
East of England Forecasting Model 2012			
<p>The East of England Forecasting Model (EEFM) was developed by Oxford Economics to project economic, demographic and housing trends in a consistent fashion. It covers a wide range of variables, and is designed to be flexible so that alternative scenarios can be run.</p> <p>The EEFM provides a set of 'baseline' forecasts for the East of England prepared by a leading independent forecasting</p>	<p>The East of England is expected to outperform the UK in the medium to long term, according to the Spring 2012 baseline forecasts, with 10.8% employment growth over 2011-21 compared with only 6.9% in the UK.</p> <p>The baseline forecasts anticipate annual average GVA growth of 2.7% between 2010 and 2020.</p> <p>Population growth over 2010-20 is estimated at 9.4%</p> <p>Net in-migration will continue, but at a lower rate than during the past</p>	<p>The model lists key economic projections for the East of England which should be taken into account when developing housing targets.</p>	<p>The SA needs to include objectives that relate to economic growth and appropriate housing provision to meet the needs of an expanding population.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
house (Oxford Economics).	decade. By 2020, the region's population will be 547,900 higher than in 2010. The baseline forecasts anticipate a strong recovery in employment, with the East of England returning to its 2008 employment peak by 2013, and an additional 327,000 jobs between 2010 and 2020.		
Transforming Suffolk's Community Strategy 2008-2028 (2008 revision)			
<p>Aim is to improve quality of life in Suffolk for its people and communities.</p> <p>Document focuses on the future looking forward to the next 20 years and is based around four themes.</p> <p><b>A Prosperous and Vibrant Economy:</b></p> <p><b>Learning and skills for the future:</b></p> <p><b>Creating the Greenest County</b></p> <p><b>Safe, Healthy, Inclusive Communities</b></p>	<p>To become the most innovative and diverse economy in the East of England:</p> <p>Transport and infrastructure to support sustainable growth</p> <p>Learning and skills levels in the top quartile in the country</p> <p>County with greatest reduction in carbon emissions;</p> <p>Reducing carbon footprint;</p> <p>Adapting to climate change and geography;</p> <p>Retain and maintain natural and historic environments</p> <p>Pursue healthy lifestyles, safety, and sense of community belonging</p>	A number of the key ambitions outlined in the document need to be considered when developing the plan.	The SA Framework should integrate the four core themes and principles.
Transforming Suffolk Community Strategy: Suffolk Strategic Partnership (2008)			
<p>Purpose of Suffolk LLA is to improve performance in an area. There is a close similarity between the outcomes in Suffolk Strategic Partnership's community strategy and those agreed for Ipswich:</p> <p>Local Strategic Partnerships for Ipswich:</p> <p>Everyone should have a roof over their head</p> <p>Everyone should enjoy good health</p> <p>There should be work for all</p> <p>The creation of a better environment</p> <p>People should be kept safe</p> <p>People should live in friendly and supportive communities.</p>	<p>Ipswich Priorities:</p> <p>Working at neighbourhood level to tackle deprivation and address health, social and economic inequalities</p> <p>Community cohesion and integration of new communities</p> <p>Meeting the growing demand for affordable homes, social rented housing and a partnership approach to addressing deprivation, inequalities and environmental issues relating to housing</p> <p>Tackling drug related crime</p> <p>Environmental issues – making sure Ipswich grows in the right way</p> <p>Supporting business to grow and create more jobs.</p>	The actions, indicators and targets of the LLA should be considered in the development of the plan.	The SA Framework should incorporate indicators and targets that seek to protect community interests.

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Inventing our Future: Collective Action for a Sustainable Economy. The Regional Economic Strategy for the East of England 2008 – 2031 (2008)</b>			
<p>Vision: By 2031 East of England to be:</p> <p>Internationally competitive with the global reputation for innovation and business growth</p> <p>A region that harnesses and develops the talents and creativity of all</p> <p>At the forefront of the low carbon and resource efficient economy</p> <p>Also:</p> <p>Emphasis on developing, attracting and retaining talent to drive the economy</p> <p>Transforming to a low resource use and low carbon economy and success in adapting to climate change both for the environment and as an opportunity for business growth</p> <p>Objectives:</p> <p>Enterprise development</p> <p>Innovation</p> <p>Digital economy</p> <p>Resource efficiency</p> <p>Skills for productivity</p> <p>Economic participation</p> <p>Transport</p> <p>Spatial Economy</p>	<p><u>Productivity and prosperity</u></p> <p>Annual growth in real workplace based GVA over 2008 – 2031</p> <p>2.3% per capita</p> <p>21.% per worker</p> <p><u>Employment</u></p> <p>Rate by 2031</p> <p>Working age population: 80%</p> <p>16-74 population: 70%</p> <p><u>Skills</u></p> <p>Share of working age population with qualification by 2020 (age 19 to state pension age)</p> <p>NVQ Level 2 or equivalent and above: 90%</p> <p>NVQ Level 3 or equivalent and above: 68%</p> <p>NVQ Level 4 or equivalent and above: 40%</p> <p><u>Inequality</u></p> <p>Earnings</p> <p>Level of lower quartile to average income by 2031: 60%</p> <p><u>Greenhouse Gasses</u></p> <p>End user attributed CO2 Emissions by 2031</p> <p>Reduction on baseline level: 60%</p> <p><u>Water Resources</u></p> <p>Household per capita consumption of water</p> <p>Reduction on 2008 baseline levels by 2030: 20%</p> <p>Per capita consumption in 2030: 120litres per head per day.</p>	<p>The plan should seek to support business growth and enterprise. In particular it should include objectives to reduce resource use and improve carbon efficiency.</p>	<p>The SA Framework should include objectives that encourage enterprise and business development. It should also include the goals that support the local economy, attract world class businesses, support and develop the local workforce, create stronger and more self-reliant communities with a shift towards a low carbon economy.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Suffolk Growth Strategy March 2013</b>			
<p>The growth strategy provides a broad framework and vision on how to encourage business to be successful. It provides opportunities for growth in different sectors of the economy in Suffolk, as well as identifies a potential to create thousands of additional high value and highly skilled jobs in the county.</p> <p>The strategy aims to address the barriers to growth and sets out objectives associated with inward investment, economic growth, improvement of skills and education and improvement of infrastructure.</p>	<p>Increase the number of apprenticeship starts (at all ages) by at least 33% by 2015/16, from 6,272 currently to 8,342; and to increase the number of 16-18 year olds in apprenticeships by 50% from 1,613 currently to 2,477.</p> <p>The vision is for Superfast Broadband (both fixed and mobile), offering typical speeds of 100Mbps, to everyone (100% of homes and small business) in Suffolk by 2020. This investment will bring benefits including economic growth of up to 20% over 15 years, and the creation of up to 5,000 new full-time jobs.</p>	<p>The plan should take into consideration the key development sites within the Suffolk Growth Strategy in Ipswich: Ransomes Europark Expansion, Ravenswood, Futura Park, Former Sugar Beet Factory, Adastral Park Expansion. Along with strategic improvements of A12.</p>	<p>The SA Framework should include objectives that promote economic growth and encourage inward investment.</p>
<b>Minerals and Waste Development Framework: Waste Core Strategy (2011)</b>			
<p>Vision:</p> <p>Cease of landfilling of untreated municipal, commercial and industrial wastes by 2026</p> <p>Recovering value from waste that cannot practically be recycled or composted</p> <p>Waste management activities to be sensitively located and appropriately operated to high standards to reduce impact/harm on the environment, human health and local amenity and tranquility</p> <p>Former temporary waste management activities (i.e. landfill sites) will be restored to a quality and a state conducive to appropriate after uses such as agriculture and improving habitat biodiversity</p> <p>Aims (reflect national and regional water policy together</p>	<p>Relevant targets:</p> <p>Minimise waste as a priority and encourage communities to take responsibility for the waste they produce through better education through a public consultation</p> <p>Have efficient transportation of waste throughout Suffolk</p> <p>Increase access to Household Waste Recycling Centres</p> <p>Minimise adverse impacts on air quality</p> <p>Minimise adverse impacts on landscape quality and the built and historic environment</p>	<p>The plan should promote sustainable waste management and promote rates of recycling.</p>	<p>The SA Framework should encourage sustainable waste management.</p>

Regional, County and Local Plans									
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA						
<p>with local considerations):</p> <p>Manage volume of waste identified in the East of England plan as being apportioned to Suffolk</p> <p>To promote and encourage sustainable practices in the transportation and management of waste</p> <p>Contribute to social and economic well being</p> <p>To protect against adverse impacts on human wellbeing and to ensure waste management facilities do not endanger human health</p> <p>To protect and enhance the built, natural and historic environment</p> <p>To assist in reducing the impacts of climate change upon the environment</p>									
Joint Municipal Waste Management Strategy for Suffolk 2003 – 2020									
<p>Enhance joint working between authorities to improve waste management services</p> <p>Involve public community groups, waste management industry and governmental bodies in all aspects of waste management</p> <p>Promotion of education programmes and awareness campaigns to increase knowledge of waste issues and participation in waste management initiatives</p> <p>Promote and encourage waste reduction and make representation seeking changes to national taxation regulation regimes in order to encourage waste reduction</p> <p>Promote and encourage waste re-use schemes:</p> <p>Supporting communities re-use schemes with advice and funding where resource allow</p>	<p><u>National Recycling and Recovery targets:</u></p> <p>Household waste recycling and composting</p> <p>Recover 45% by 2015</p> <p>Recover 50% by 2020</p> <p>Municipal waste recovery:</p> <p>Recover 67% by 2015</p> <p>Recover 75% by 2020</p> <p>Landfill Allowance Trading Scheme (LATS) Landfill allowances:</p> <table border="1"> <thead> <tr> <th>LATS</th> <th>Landfill Allowance</th> </tr> </thead> <tbody> <tr> <td>2013</td> <td>99,160</td> </tr> <tr> <td>2020</td> <td>69,385</td> </tr> </tbody> </table>	LATS	Landfill Allowance	2013	99,160	2020	69,385	<p>The plan should recognise the need to implement sustainable waste removal that does not impact on human health or the environment.</p> <p>Any waste policy in the plan should be developed in accordance with the waste strategy with a clear commitment to the waste hierarchy.</p>	<p>The SA Framework should promote and encourage sustainable waste management particularly within new development.</p>
LATS	Landfill Allowance								
2013	99,160								
2020	69,385								

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>Promote awareness of what people can do to re-use waste</p> <p>Encourage the re-use of waste collected through recycling centres</p> <p>Seek to maximise the proportion of waste that is recycled or composted, aiming to achieve at least 60% by 2015</p> <p>Introduce “three stream” collection system from the curb side of at least 80% of households in Suffolk by 2010</p> <p>Investigate the possibility of introducing the curb side collection of glass</p> <p>Promote home composting in all areas through promotional and educational campaigns</p> <p>Support community composting initiatives</p> <p>Increase the number of bring sites for the collection of glass throughout the county</p> <p>Optimise the number and location of household waste and recycling centres; increase the quantity and range of material recycled – aiming to recycling 55% of waste taken to sites by 2015</p> <p>Introduce non landfill facilities for the treatment of residual waste</p> <p>Minimise the amount of waste landfill by maximising reduction, re use, recycling and composting</p> <p>Reduce costs by securing joint procurement and tendering and maximising funding from external sources</p> <p>Work with Waste and Resource Action Programme, businesses and the community in order to develop markets for recycled waste and outlets.</p>	<p><u>Regional relevant targets:</u></p> <p>Minimise the impacts of new developments, especially in the Key Centres of Development and Change, on regional waste management requirements</p> <p>Minimise the environmental impact of waste management arising from movement of waste, and help secure the recovery and disposal of waste without endangering human health</p> <p>Recognise particular locational needs of some types of waste management facilities in determining planning application and defining green belt boundaries</p> <p>Targets to minimise waste and provide the basis for implementing the overall aim of recycling, compositing, and recovering value from waste:</p> <p>Municipal waste – recovery of 70% by 2015</p> <p>Commercial and industrial waste – recovery of 75% by 2015; and eliminate landfilling of untreated municipal and commercial waste in the region by 2021</p> <p>Relevant Indicators:</p> <p>Kilograms of household waste collected per head (BVPI 84) – Waste Disposal Authority (WDA) and seven Waste Collection Authority (WCA) figures combined;</p> <p>Tonnage and percentage of household waste recycled and composted, including HWRC (BVPIs 82a and 82b);</p> <p>Percentage of householders that have a separate kerbside collection of dry recyclable and compostable waste;</p> <p>Number of home composters distributed via partnership scheme;</p> <p>Recycling rate at HWRCs;</p> <p>Tonnage of municipal waste landfilled</p>		



Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Suffolk's Climate Action Plan 2 (2012)</b>			
<p>Develop a credible pathway to reduce carbon emission associated with energy use in Suffolk by 60% (on 2004 levels)</p> <p>Support the development of a green economy</p> <p>Adapt to future climate change and resource scarcity</p>	<p>Reduction of Suffolk's annual CO2 emission by 760kt by the end of the decade</p> <p>–</p> <p>Foster resilience to climate change (i.e. winter flooding and summer heat wave events) and promote water saving and energy efficiency</p>	<p>The plan must ensure it is resilient to the future effects of climate change.</p>	<p>The SA Framework should echo the vision and objectives of the plan. It should include objectives that reduce greenhouse gas emissions and adapt to climate change.</p>
<b>Suffolk's Local Transport Plan 2011 - 2031</b>			
<p>Priorities:</p> <p>Creating a prosperous and vibrant economy</p> <p>Creating the greenest county</p> <p>Safe, healthy and inclusive communities (Protect vulnerable people and reduce inequalities)</p> <p>Learning and skills for the future (Transform learning and skills)</p>	<p>Transport aims to meet priorities:</p> <p>1)</p> <p>Improve connectivity and accessibility</p> <p>Maintain core transport networks. Balance capacity and demand for travel, through increasing the use of sustainable transport and reducing need for travel</p> <p>Improve access to jobs and commercial markets for residents and businesses based in the county</p> <p>2)</p> <p>Reduced emissions from transport, including road maintenance</p> <p>Maintaining resilience of transport networks (e.g. coping with flooding, pot holes, winter damage)</p> <p>Reduced air pollutant emissions</p> <p>3)</p> <p>Facilitating an increase in walking and cycling</p> <p>Improving the physical accessibility of the transport system, improving information about travel options, improving access to services for those</p>	<p>The plan should be aligned with Suffolk's Transport Plan. It should also seek to reduce the dependence on the private car through maximising opportunities for people to use sustainable modes of transport.</p>	<p>The SA Framework should include objectives that encourage and promote the use of sustainable transport along with providing new infrastructure where required.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	without access to cars Supporting wider regeneration Reducing the number of casualties on the transport network Reducing impact of poor air quality on local communities 4) Improving accessibility to schools, colleges, universities and other places of learning Access to broadband for online learning		
New Anglia Local Enterprise Partnership 'Towards a Growth Plan' 2013			
<p>We have a simple Vision for New Anglia in 2025- more jobs, businesses and prosperity.</p> <p>In 2025, Greater Norwich and Greater Ipswich will be two of the most competitive City regions in Europe for domestic and foreign investment. Suffolk and Norfolk will have as international reputation for our home produced food, the quality of our festivals and cultural events and the beauty and diversity of our coasts and countryside.</p> <p>School attainment throughout New Anglia will match the best in Europe making it easy to attract skilled and talented professionals to drive our global companies.</p> <p>Superfast broadband and 6g mobile phone services will be available everywhere in New Anglia.</p>	<p>The UK economy will grow by 0.6% during the rest of 2013 and by 1.8% and 2.3% in the next two years.</p>	<p>The plan should seek to promote sustainable economic growth within Ipswich that meets the needs of its residents with regards to jobs and new homes.</p>	<p>The SA Framework should include objectives that support sustainable economic growth and the provision of jobs.</p>
Expanding Suffolk's Horizons: Economic Strategy – Taking Suffolk to 2013			
<p>Aims to promote and develop what makes Suffolk a special and distinctive place in which to live and work but at the same time addressing one central target, raising Gross Value Added (GVA) per head.</p>	<p>Increase GVA per head by 95% of UK Average</p> <p>Increase net business formation rate by 1% per annum</p> <p>Increase gross weekly pay for full time employees to 94% of regional median</p>	<p>The plan should seek to promote sustainable economic growth within Ipswich that meets the</p>	<p>The SA Framework should include objectives that support sustainable economic growth and the</p>

<b>Regional, County and Local Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<p>Objectives:</p> <p>Raising wage and skill levels more closely in line with regional average</p> <p>Promoting innovation and entrepreneurship</p> <p>Stimulating enterprise and ambition, particularly among young people</p> <p>Developing Suffolk's economy around centres of excellence of key growth areas</p> <p>Ensuring growth is sustainable economically and environmentally</p>	<p>Increase number of new jobs created/safeguard through inward investment by 10%</p> <p>Increase the value of tourism by 2% per annum</p> <p>Increase the levels of education and qualifications</p> <p>Promote Ipswich in the Environmental Agency's flood defence register with a further commitment to protect areas of significant commercial/agricultural value</p>	<p>needs of its residents with regards to jobs and new homes.</p>	<p>provision of jobs.</p>
<b>East of England Learning and Skills Council (LSC) Equality and Diversity Action Plan 2008</b>			
<p>It lays out actions for the LSC East of England to meet its statutory duties as laid out in the LSC Single Equality Scheme</p> <p>The action plan is broken into four areas:</p> <p>Learning and skills</p> <p>Performance of the system</p> <p>Impact measures and impact assessment</p> <p>Governance</p>	<p>Raise the quality and improve the choice of learning opportunities</p> <p>Raise the skills of the region, giving employers and individuals the skills they need to improve productivity</p> <p>Raise their contribution to economic development</p> <p>Raise the performance of a world class system that is responsive, provides choice and is valued and recognised for its excellence</p> <p>To provide measures that will enable overall progress to be judged</p> <p>Make promoting equality and diversity an integral part of how the East of England LSC is led and governed</p>	<p>The plan should seek to reduce discrimination and promote equality and diversity within Ipswich.</p>	<p>The SA Framework should include objectives that reduce discrimination and promote equality within Ipswich.</p>
<b>Suffolk Haven Gateway Employment Land Review 2009</b>			
<p>The Employment Land Review and Strategic Sites Study for Suffolk Haven Gateway looks into providing the right mix of employment land to meet the future job growth target of 30,000 in the Suffolk Haven Gateway sub-region. There are evident opportunities through investment in infrastructure and allocation of employment land in the right locations (the</p>	<p>No specific indicators or targets of relevance in this plan or programme.</p>	<p>The plan should reference this document when selecting new employment sites.</p>	<p>The SA Framework should include objectives that support economic growth.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
A14 and the Ipswich Fringe) to provide a quality and choice that will support efforts to retain existing businesses and encourage new ones and thereby work to achieve the employment target.			
East of England Plan for Sport (2004)			
The aim is to change the culture of sport and physical activity in England in order to increase participation across all social groups leading to improvements in health and in other social and economic benefits; and providing the basis for progression into higher levels of performance.	Key targets: Increasing participation in sport and active recreation Improving levels of performance Widening access Improving health and well being Creating stronger and safer communities Improving education Benefiting the economy	The plan policies should seek to increase participation in sport. This could include opportunities to improve access to existing facilities, to prevent the loss of existing facilities and to support the provision of new facilities.	The SA Framework should consider objectives to increase participation in sport through improved access and additional facilities. Suitable objectives should also be developed in relation to protecting human health-
Biodiversity Action Plan for Suffolk (Various dates)			
The plan comprises a series of action plans for habitats and species in Suffolk.  For each of the habitats and species information is provided about current national, regional and local status.	For each habitat type/species a series of objectives, actions and timescales for implementation are identified.	The plan should incorporate policies that support and promote the enhancement of biodiversity.	The SA Framework should seek to maximise benefits to biodiversity resources.
Water for Life and Livelihoods: River Basin Management Plan: Anglian River Basin District (2009)			
This plan has been prepared under the Water Framework Directive, which requires all countries throughout the European Union to manage the water environment to consistent standards. Each country has to:  Prevent deterioration in the status of aquatic ecosystems, protect them and improve the ecological condition of	<b>By 2015, 16 per cent of surface waters (rivers, lakes, estuaries and coastal waters) in this river basin district are going to improve for at least one biological, chemical or physical element</b> , measured as part of an assessment of good status according to the Water Framework Directive. This includes an improvement of <b>1,700 km</b> of the river network in relation to fish, phosphate, specific pollutants and other	The plan should seek to protect and enhance the water environment.	The SA Framework should include objectives that seek to protect and enhance water quality and water resources.

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>waters;</p> <p>Aim to achieve at least good status for all water bodies by 2015. Where this is not possible and subject to the criteria set out in the Directive, aim to achieve good status by 2021 or 2027;</p> <p>Meet the requirements of Water Framework Directive Protected Areas;</p> <p>Promote sustainable use of water as a natural resource;</p> <p>Conserve habitats and species that depend directly on water;</p> <p>Progressively reduce or phase out the release of individual pollutants or groups of pollutants that present a significant threat to the aquatic environment;</p> <p>Progressively reduce the pollution of groundwater and prevent or limit the entry of pollutants;</p> <p>Contribute to mitigating the effects of floods and droughts.</p>	<p>elements.</p> <p><b>By 2015 19 per cent of surface waters will be at good ecological status/potential and 45 per cent of groundwater bodies will be at good status.</b> In combination 20 per cent of all water bodies will be at good status by 2015. The Environment Agency wants to go further and achieve an additional two per cent improvement to surface waters across England and Wales by 2015.</p> <p>The biological parts of how the water environment is assessed – the plant and animal communities – are key indicators. <b>At least 30 per cent of assessed surface waters will be at good or better biological status by 2015.</b></p>		
<b>In Step with Suffolk: Right of Way Improvement Plan (2006-16)</b>			
<p>Objectives:</p> <p>Provide a better signed, maintained and accessible network</p> <p>Provide and a protect a more continuous network that provides for the requirements of all users</p> <p>Develop a safer network</p> <p>Increase community involvement in improving and managing the network</p> <p>Provide an up to date publically available digitised definitive map for the whole of Suffolk</p> <p>Improve promotion, understanding and use of network</p>	<p>No relevant indicators</p>	<p>The plan should be consistent with the objectives of the Rights of Way Improvement Plan.</p>	<p>Baseline information, issues and opportunities identified within the plan should be considered when developing the SA Framework.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Leading the Way – Green Economy Pathfinder Manifesto 2012-15, New Anglia LEP</b>			
Looking at the potential for sustainable growth in the development of low-carbon and environmental goods and services; the potential for employment and skills development; innovative financing for businesses and entrepreneurs; business resource efficiency; energy; how best to value the areas natural resources; and community benefits to be enjoyed from a thriving green economy in the Anglia region.	<p>Key targets:</p> <p>To grow sustainably and for the long term</p> <p>To use natural resources efficiently</p> <p>To be more resilient</p> <p>To build on current experience and exploit comparative advantages – to deliver innovative low-carbon solutions at scale.</p>	The plan should include methods to promote sustainable growth, develop a low carbon economy and increase efficiency.	The SA Framework should include objectives that promote sustainable growth, seek to develop a low carbon economy and increase efficiency.
<b>Wild Anglia Manifesto ,September 2013, Part 1 Aims and Objectives</b>			
<p>Wild Anglia’s ambition to get sustainable development right in Norfolk and Suffolk. It focusses on the future of businesses, a better quality of life for a healthier population and a better place for our wildlife to thrive.</p> <p>Key objectives:</p> <p>Economic growth: nature will make a full contribution to the success of the economy.</p> <p>Exemplary ‘green infrastructure’: insisting on the best projects for people, nature and economy.</p> <p>Strengthening nature: creating, improving and investing in the natural environment</p> <p>Healthy, happy society: making the most of nature’s capacity to improve lives.</p>	No specific targets and indicators	The plan should promote green infrastructure.	The SA Framework should include objectives to promote and developing green infrastructure in Ipswich.

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Suffolk's Nature Strategy (Wild Anglia, 2014)</b>			
<p>A 2020 vision for Suffolk's natural environment working together as individuals, communities, businesses and decision-makers, we will ensure Suffolk's natural environment is conserved and enhanced for future generations and continues to be seen as one of the county's key strengths. Its intrinsic value, as well as its importance to our economic growth, is increasingly understood, whilst the people of Suffolk and our visitors are able to gain better access to enhanced enjoyment and a deeper understanding of its unique qualities. We will continue to add to our knowledge of Suffolk's wildlife and landscapes and to collect high-quality information.</p>	<p>Suffolk's Nature Strategy describes the challenges and opportunities our natural environment faces. Its purpose is to articulate what we believe are the key natural environment priorities for the county and to convey to decision-makers how the wildlife and landscapes of Suffolk are important building blocks for our own economic growth and health and wellbeing. The recommendations and actions we propose within this document are both forward-looking and challenging. Their delivery will enhance the environment of Suffolk itself, as well as our ability to derive both economic and social benefits from it. Once you have read this document we hope that your understanding of the importance of the natural environment goes far beyond its beauty. It is aimed particularly at the leaders of public, private and voluntary sector organisations, but we hope it will also be of interest to anyone who cares about Suffolk's natural environment and the role it plays in our prosperity and wellbeing. The messages are equally relevant to businesses, health professionals and community representatives. Whilst conservation of Suffolk's environment is of particular interest to us, everyone has a responsibility to look after it, and of course, many already do.</p> <p>The strategy is set out in three broad sections: natural environment, economic growth and health and wellbeing each containing a number of sub-sections for issues of particular importance to the delivery of our vision. Suffolk's Nature Strategy is written in the context of Wild Anglia's manifesto2 (the Local Nature Partnership (LNP) across Norfolk &amp; Suffolk).All the organisations involved in drafting this strategy are closely involved with the LNP and this strategy will contribute to Wild Anglia's vision across Norfolk &amp; Suffolk.</p>	<p>The plan should seek to protect and enhance the natural environment.</p>	<p>The SA Framework should include objectives that seek to protect and enhance nature and its resources.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Suffolk Cycling Strategy (Suffolk County Council)</b>			
<p>With a growing population which will place increasing pressure on our road network, we have to consider how best to encourage people to take to their bikes. Clearly, we want to foster an environment where bike and car coexist, with an infrastructure that supports both and which encourages cycling, particularly for those two-thirds of car journeys which are fewer than five kilometres. We also know that many drivers would cycle more if the quality and provision was improved. So, the challenge is to promote the benefits of cycling as widely as possible, whilst at the same time we take on the more practical task of improving our cycling infrastructure. From local projects in our towns and villages, to better signage and a host of activities in between, we can succeed in encouraging more people in Suffolk to cycle than ever before if we work together. There are numerous thriving cycling groups and communities in Suffolk, from young people cycling to school to people commuting to work. We have a great foundation upon which to build.</p>	<ul style="list-style-type: none"> <li>• To encourage cycling across all sectors of the community, supporting</li> <li>• Suffolk's 'Most Active County' ambitions</li> <li>• To promote a transfer to cycling (and walking) for short distance trips,</li> <li>• supporting Suffolk's 'Creating the Greenest County' ambitions To promote the benefits of cycling for health and for the subsequent</li> <li>• savings in the health budget</li> <li>• To foster enthusiasm for cycling in young people</li> <li>• To plan and design for the future with cycling in mind</li> <li>• To create a safe and cycle friendly environment</li> </ul>	<p>The plan should seek to help and support cycle networks.</p>	<p>The SA Framework should include objectives that seek to help and support cycle networks.</p>
<b>Anglian Water's Water Resources Management Plan 2015</b>			
<p>This is our 2015 Water Resource Management Plan (WRMP). It shows how we are going to maintain the balance between supply and demand over the next 25 years, as well as deal with the longer term challenge of population increase, climate change and growing environmental needs. We supply water to approximately 2</p>	<p>The key elements of our final plan are:</p> <ul style="list-style-type: none"> <li>• Supporting water efficiency, so that customers only use the water they need</li> <li>• Reducing the number of leaks from the network of pipes that transports water</li> </ul>	<p>The plan should seek to help and provide sustainability measures for water resources.</p>	<p>The SA Framework should include objectives that seek to help and support sustainable use of water resources.</p>



Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>million households in East Anglia, the adjacent areas of the South East, Midlands, Yorkshire, Humberside and to households in Hartlepool. Rainfall in most of our supply area is significantly less than the national average. We are classed as an area of severe water stress and have many wetland and conservation sites of national and international importance. Safeguarding these vital assets and maintaining supplies to customers are the two objectives of this plan. Over the next 25 years, our supply-demand balance is at risk from growth, climate change and the reductions in deployable output that we will make to restore abstraction to sustainable levels. In the worst case combination, the impact could approach 567Ml/d, equivalent to approximately 50% of the water we put into supply in 2012/13. We also have to manage risks from drought, deteriorating raw water quality and the impact of cold, dry weather on our distribution system and customer supply pipes.</p>	<ul style="list-style-type: none"> <li>• Transferring water from where there is a surplus to areas of shortage</li> <li>• In the long-term, developing additional supplies.</li> </ul>		
One Ipswich Everybody Matters Strategy 2008-2010			
<p>We want Ipswich to be a vibrant, prosperous and thriving place. We will address deprivation and inequality in neighbourhoods and develop an economically dynamic and enterprising society so everyone in Ipswich can:</p> <ul style="list-style-type: none"> <li>• be prosperous and have a place to live</li> <li>• be healthy and stay well</li> <li>• achieve their potential and enjoy life</li> <li>• keep safe</li> <li>• have a greater say and better choices</li> <li>• live in friendly and supportive communities</li> </ul>	<p>15,400 additional homes to be provided for (2001 - 2021). An additional 4,710 additional homes to be provided for just outside Ipswich. 18,000 new jobs to be provided for (2001 - 2021). Affordable housing to constitute at least 30% of housing supply with an aspiration of 40% of supply if Ipswich housing stress warrants higher provision. Car traffic levels to stabilise at 1999 levels. All major developments to provide at least 10% of their energy requirements via renewable power generation.</p>	<p>The plan should seek to reduce discrimination and promote equality and diversity within Ipswich.</p>	<p>The SA Framework should include objectives that reduce discrimination and promote equality within Ipswich along with promoting community involvement.</p>

<b>Regional, County and Local Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<p>We will:</p> <p>Deliver a long-term investment in community development to respond to important local issues across the town. The One- Ipswich partnership has chosen a project focused approach to deliver our outcomes, and we will seek to exploit and replicate the learning of existing good practice. This will help all the LSP partners by:</p> <ol style="list-style-type: none"> <li>1. Assisting in generating community intelligence.</li> <li>2. Addressing health concerns.</li> <li>3. Improving the environment.</li> <li>4. Engaging with young people.</li> <li>5. Improving access to drug and alcohol treatment, and signposting.</li> <li>6. Generating community involvement</li> <li>7. Integrating the voluntary sector</li> </ol>			
<b>Ipswich Borough Council Level 2 Strategic Flood Risk Assessment (2011)</b>			
<p>This Level 2 SFRA supersedes the draft level 1 SFRA dated November 2007 and accounts for the presence of recently improved flood defences within Ipswich, as well as for the planned flood defence barrier expected to be operational in 2014.</p> <p>The SFRA also considers the potential effects of development on local flooding and minor watercourses and identifies mitigation measures including sustainable urban drainage systems (SUDS) and suggests a framework for safe development in flood zones 2 &amp; 3.</p>	No specific targets identified.	The plan should seek to avoid development within Flood Zone 3.	The SA Framework should include objectives that address flood risk within Ipswich.

<b>Regional, County and Local Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<b>The Ipswich Drainage and flood defence policy (2002 with minor updates in 2009)</b>			
<p>Sets out the Council's policy relating to flood protection and drainage</p> <p>Objectives:</p> <p>Control of development in areas at risk of flooding</p> <p>The Inspection and maintenance of ordinary watercourses</p> <p>Establishing flood warnings and emergency evacuation</p> <p>Creating sustainable urban drainage systems (SuDS)</p> <p>Includes: gardens, roads, pipework and manholes, private roofs, driveways and car parks; construction infiltration systems</p>	No specific targets and indicators	<p>Drainage and flood defence must be a key consideration during the preparation of the plan.</p> <p>The plan should seek to avoid development within Flood Zone 3.</p>	<p>The SA Framework should include policies that seek to preserve water resources, protect water quality and reduce flood risk i.e. through ensuring new development provides SuDs measures.</p>
<b>Integrated Landscape Character Objectives (2010)</b>			
<p>The aim was to develop a regional urban landscape typology for the East of England. It articulates the broad variety of towns and cities in the region and the characteristics of the urban landscape of each settlement.</p> <p>Provides an overview of landscape character and settlements for informing future assessment such as green infrastructure strategies for extension to existing settlements and creation of new settlements.</p>	Development must maintain a "sense of place" relevant to the area.	Landscape character should be considered when drafting the plan and siting new development.	The SA Framework should include an objective on protecting and enhancing landscape character and quality.
<b>Countryside Character Volume 6: East of England (1998)</b>			
This document presents the results of Natural England's survey of the countryside character and landscape of the East of England.	The document contains no targets or indicators.	The East of England's landscape character should be considered when drafting the plan and	The SA Framework should include an objective on protecting and enhancing landscape

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
Many different elements combine to create the character of the countryside. Important to recognise influences on this character that combine to a sense of place, and set a tract of countryside apart from adjacent areas.		siting new development.	character and quality.
Ipswich Economic Development Strategy 2012 – 2026			
<p>The economic development strategy will focus on job creation and retention, as well as promoting and attracting investment to Ipswich, reflecting core aims in the Council's Corporate Plan – 'Building A Better Ipswich1'.</p> <p><u>Vision statement</u></p> <p>"Ipswich will be an inspiring and exciting town perceived as both an attractive location for investment in business and a centre of excellence for education. Creative people in partnership with dynamic businesses will drive a diverse and innovative urban economy. A sustainable and low carbon Ipswich will enable individuals to flourish, and inhabitants will be notable for their enterprise, ambition, creativity and pride in their town"</p>	There are no specific targets and indicators.	The plan should seek to facilitate regeneration and economic growth across Ipswich.	The SA Framework should include objectives that support sustainable economic growth.
Ipswich Borough Council Corporate Plan (2012)			
<p>The new corporate plan for Ipswich consists of 6 themes and it reveals that the council's priority is to attract new investment and jobs to Ipswich by helping to boost private sector jobs and by supporting the construction industry by building much-needed new affordable housing.</p> <p>There are two underlying principles:</p> <p>Underlying principle 1: A Fairer Ipswich:</p> <p>Everything we do will be based on the principles of fairness and participation. We will work to eliminate discrimination,</p>	<p>1. A stronger Ipswich Economy:</p> <p>Develop an Economic Development Strategy with a focus on job retention and creation and to promote and attract investment into Ipswich;</p> <p>Increase both the number and profile of apprenticeships within the business community of Ipswich;</p> <p>Assist small and medium enterprises to deliver training and business support</p> <p>Support skills development and promote educational, business and</p>	The Corporate Plan identifies priorities within Ipswich which should be taken into account when developing the pan.	The SA Framework should include objectives that support the economy and address housing issues.

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>promote equality of opportunity, and foster good relations amongst all the people of Ipswich.</p> <p>Underlying Principle 2: Value for Money:</p> <p>We will constantly seek to improve the efficiency of the Council, with savings used to protect and improve services and to keep down council tax.</p> <p>Themes:</p> <ol style="list-style-type: none"> <li>1. A stronger Ipswich economy</li> <li>2. A safer and healthier Ipswich</li> <li>3. Keeping Ipswich moving</li> <li>4. Quality housing for all</li> <li>5. A greener Ipswich</li> <li>6. A more enjoyable Ipswich</li> </ol>	<p>community engagement.</p> <p>4. Quality housing for all</p> <p>Continue investment to maintain the Decent Homes Standard and achieve the Ipswich Standard by 2014;</p> <p>Increase the delivery of affordable housing by aiming for 35% of all new homes delivered to be affordable, and by keeping our affordable housing policies under review;</p> <p>Work in partnership with Homes and Communities Agency to deliver affordable housing and employment;</p> <p>Work to minimise the impact to local residents of the reduction in the County Council's Supporting People funding to Ipswich Borough Council (e.g. to sheltered housing tenants and homeless people)</p>		
Ipswich Cultural Strategy 2011-2014			
<p>This three year strategy sets out how Ipswich Borough Council will focus on six key objectives to further improve cultural assets while facilitating the development of others.</p> <p>The strategy identifies major improvements, including a refurbishment of Crown Pools. It also highlights big ambitions for the future including a new Centre of Excellence for the arts focussed on the Ipswich Museum and Art School. The success of these will be dependent on winning support from local residents and stakeholders as well as achieving external funding.</p> <p>The new strategy has six themes with key actions to provide a focus for investment and decision-making over the next 3 years:</p>	<p>Focus activity on key local assets and aim to reduce duplication and improve efficiency through better co-ordination and management of linked services. We will make better use of partnerships and voluntary provision, maximise income and seek external funding where available.</p> <p>Promote the town's cultural facilities and develop its cultural economy to attract more visitors (especially those who stay more than one day) and boost the local economy.</p> <p>Seek to improve our facilities where we can and ensure they are well maintained and run by qualified customer focussed staff.</p> <p>Encourage communities to become involved in the management and maintenance of their local facilities.</p> <p>The Council will work with partners, including the County Council, Nations and Regions East, private providers and the third sector to</p>	<p>The strategy identifies the benefit of improving and developing cultural assets – the plan should seek to protect and enhance heritage assets across the borough. .</p>	<p>The SA Framework should include objectives conserve and enhance heritage assets within Ipswich.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
1. Responding to the national pressure on public spend 2. Developing the Cultural Economy 3. Improving and sustaining what we have 4. Increasing participation in cultural activity 5. 2012 Olympic Legacy 6. Ambitions for the future	provide opportunities and a lasting legacy linked to 2012. Secure £10m investment in a new Centre of Excellence for Arts & Culture, combining the existing Ipswich Museum with adjacent buildings: Ipswich Art School; Wolsey Studio and; High Street Exhibition Gallery, to create a truly world class facility and tourist attraction, providing a source of pride and inspiration for the community.; Establish a new sports village focussed on Gainsborough Sports Centre with more sporting facilities including improved football/all weather pitches, cycling facilities etc.;		
Ipswich Environment Strategy 2010			
This overarching Strategy explains how we deliver environmental performance through different areas of the Council's activities and its policies and strategies. This Strategy is not subordinate to other strategies. This Strategy will enable Ipswich Borough Council to improve its environmental performance by identifying and addressing environmental issues that are not covered by other policies and strategies; and by referencing and monitoring environmental actions that are addressed elsewhere. This document is driven by the Council's corporate strategy and its community strategy we set our strategic objectives. 'Transforming Ipswich' identifies 6 key themes to develop performance: Clean & Green Ipswich Expanding Ipswich Safe Ipswich Strengthening Communities in Ipswich	Seek to continually improve the cleanliness of Ipswich and seek to enhance the town through effective urban design Reduce waste by supporting initiatives that reduce, re-use and recycle Ensure that residents and businesses value the environment and take action to reduce environmental impact through education, campaigning and enforcement Ensure adequate open spaces and amenity areas are available Protect and enhance biodiversity, by managing, developing and interpreting our valuable natural habitats and sensitive wildlife sites Monitor air, land, water and noise pollution within the Borough and take measures to minimise local pollution consistent with sustainable development principles Reduce carbon emissions by encouraging and supporting initiatives that promote renewable energy and energy efficiency	The plan should seek to maximise environmental benefits across the borough as part of new development. .	The SA Framework should include objectives that maximise benefits to the environment.

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>Travel Ipswich</p> <p>Vibrant Ipswich</p> <p>The primary theme for this strategy is Clean and Green Ipswich:</p> <p><i>'We will work with the community to make Ipswich a model urban clean and green place'</i></p>			
<b>The Ipswich Health and Wellbeing Strategy 2011 – 2016</b>			
<p>The vision is to improve the health and wellbeing of the people of Ipswich and support them in adopting a healthy lifestyle</p> <p>Priorities:</p> <p>To develop and implement an action plan to meet the vision</p> <p>Reduce health inequalities</p> <p>Promote healthy lifestyles and healthy communities</p> <p>Collate local information on health and wellbeing issues and to address them</p>	<p>No indicators.</p>	<p>The plan should promote healthy lifestyles, e.g. providing new recreational facilities, areas of open space, footpaths, cycle routes etc.</p>	<p>The SA Framework should include objectives promoting healthy lifestyles and improved health.</p>
<b>Ipswich Housing Strategy 2010/11-15/16</b>			
<p>Vision:</p> <p>Everyone in Ipswich should have the opportunity to rent or buy a decent home at the price they can afford, in a sustainable community where they want to live and work</p> <p>Priorities:</p> <p>Improve housing supply and improving neighbourhoods through a mix of high quality, environmentally sustainable homes for sale or rent</p> <p>Improving housing quality and environmental sustainability</p>	<p><u>Priority 1</u></p> <p>Improving strategic links</p> <p><u>Affordable housing targets:</u></p> <p>To be provided on sites of 0.5hectares or more, or 15 units or more</p> <p>The amount to be provided is 35% and a minimum of 65% of this must be provided as social rented housing</p> <p>Continued supply of new affordable homes</p> <p>Balanced, sustainable communities</p> <p>Balance of large and small affordable homes</p>	<p>The plan should ensure that new housing meets an identified need across Ipswich, taking into consideration, quality, housing type, density, affordability, location etc.</p>	<p>The SA Framework should include objectives, indicators and targets that support new homes e.g. providing an appropriate balance of housing types.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>Supporting and including vulnerable adults, hard to reach groups and all communities</p> <p>Doing the basics better for less</p>	<p>Target for at least 65% of new affordable homes to rent</p> <p>Meeting gypsy and traveller pitch needs</p> <p>New housing that meets the needs of all communities</p> <p>Right mix of new market, affordable and specialist housing for older people</p> <p>New homes for people with care and support needs, and adapted homes</p> <p>New homes for students in balanced communities</p> <p>Environmental sustainability</p> <p>Improved housing supply through the best use of existing stock</p> <p><u>Priority 3:</u></p> <p>Effective housing and neighbourhood management through partnership working</p> <p><u>Priority 4:</u></p> <p>All housing services to represent good value for money</p> <p>Tenants and residents are involved in decision making</p>		
<b>Ipswich Town Centre Master Plan 2012</b>			
<p>The Town Centre Master Plan provides a view of what Ipswich Borough Council and stakeholders agree is the way forward to achieve an enhanced town centre in Ipswich. The 15-year plan has an end date of 2027. It complements the adopted Core Strategy and Policies Development Plan Document and other relevant policy documents.</p> <p>The aim is to enhance, remodel and develop the town centre, delivering a programme of regeneration and renewal which builds on the aspirations to be a regional centre for shopping and culture.</p>	<p>The document contains no targets or indicators.</p>	<p>The plan should be consistent with the approach identified within this master plan.</p>	<p>The SA Framework should include objectives that seek to facilitate regeneration not only within Ipswich town centre but borough wide.</p>



Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Ipswich Open Space and Biodiversity Policy/Strategy 2013-2023</b>			
<p>This policy establishes guiding principles for the provision and management of green space within Ipswich Borough, and recommends a strategy for its protection and enhancement so that it can be enjoyed by future generations.</p> <p>Vision statement:</p> <p>'To safeguard, protect and enhance biodiversity and the environment and improve everyone's quality of life by working in partnership with others to ensure that our parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefiting the whole community'</p>	<p>Ensure the provision and management of public open space meets customer needs, now and over the next 10 years.</p> <p>Ensure the natural environment, trees and wildlife is afforded appropriate protection.</p> <p>Ensure the Council operates within the law and where possible adheres to best practice.</p> <p>To raise awareness of the benefits and value of good quality, accessible, biodiversity rich public open space.</p> <p>Identify priorities for future investment and thus ensure best use of available resources.</p> <p>Provide appropriate guidance through the planning process to ensure new public open space is appropriately located, of a high quality and meets local needs.</p> <p>Plan for and mitigate the effects of climate change.</p> <p>Improve the quality of the public realm, natural environment and local heritage.</p> <p>Build social cohesion and encourage healthy lifestyles through a well planned and managed 'green space' infrastructure.</p> <p>Create a delivery plan for green infrastructure provision,</p> <p>Ensure any cross boundary provision is properly coordinated and managed and</p> <p>Ensure heritage parks and heritage features within our parks are afforded appropriate protection.</p>	<p>The strategy identifies principles for the provision and management of green space which should be taken into consideration in the plan.</p>	<p>The SA Framework should include objectives that seek to protect and enhance local biodiversity.</p>
<b>Tree Management Policy 2010</b>			
<p>The Tree Management Policy will allow the council:</p> <p>To continually develop an integrated approach to tree</p>	<p>No relevant indicators.</p>	<p>The plan should promote effective tree management</p>	<p>The SA Framework should consider the</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>management that embraces all aspects of the council's tree related activities in a coherent and co-ordinated tree programme.</p> <p>To promote awareness of the value of trees in our environment.</p> <p>To interpret the policy framework.</p> <p>To give direction and guidance to local initiatives both public and private.</p>		within Ipswich.	importance of tree management.
Allotment Strategy 2014-2020 (2005)			
<p>A successful strategy will bring allotments into public focus advertising the benefits for all, resulting in increased lettings and improved standards.</p> <p>This will be done by developing a service in which people can expect good security and facility provision. Increased promotion as an activity for all should encourage people of all backgrounds to develop their skills as new gardeners.</p> <p>The aims of the allotment strategy are:</p> <p>to raise the awareness of others to the benefits of allotments for all leading to an increase in the number of plot holders</p> <p>to set a standard for the provision of allotments in Ipswich</p> <p>to improve the standard of service provision</p> <p>to investigate ways to improve the financial position of the service</p> <p>consider the demand for allotments both now and in the future</p> <p>review and propose changes if required to the provision and distribution of allotment land in Ipswich.</p>	No relevant indicators.	The plan should identify new allotment space within Ipswich if there is a proven need.	The SA Framework should seek to provide new areas of open space for communities to come together and enjoy.

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Ipswich Strategic Housing Land Availability Assessment Draft Update Report (2013)</b>			
<p>The Strategic Housing Land Availability Assessment (SHLAA) is a key component of the evidence base underpinning the Council's Local Plan, by identifying a list of sites which may be suitable and available for housing development.</p> <p>The study identifies sites with potential for housing development but the study does not make any decisions about site allocations.</p>	<p>No specific targets of relevance in this plan or programme.</p>	<p>The SHLAA identifies potentially suitable housing sites in the Borough – the plan should ensure allocations brought forward within this document are considered in the plan.</p>	<p>The SA Framework should include objectives that relate to the choice, quality and diversity of housing and also ensuring that such housing is available to all communities and sectors of society.</p>
<b>Ipswich Housing Market Area Strategic Housing Market Assessment 2012</b>			
<p>This document updates the 2008 Strategic Housing Market Assessment (SHMA) for the Ipswich Housing Market Area, which comprises: the districts of Babergh, Mid Suffolk and Suffolk Coastal, and the Borough of Ipswich. This update is a hybrid between a straight- forward review of the data and an entirely new assessment.</p>	<p>Currently, there is a backlog of over 4,000 households in need of a suitable and affordable home in the Ipswich HMA.</p> <p>The supply of new affordable homes and the reuse of existing stock are not sufficient.</p> <p>In order to address this shortfall, 70% of all new homes in the Ipswich HMA currently being planned would need to be affordable.</p> <p>The needs are greatest in Ipswich with an annual need for at least 584 more homes to be affordable. Need within Suffolk Coastal is the next greatest at 355, in Mid Suffolk 229 are required and 134 more affordable homes are needed each year in Babergh.</p>	<p>The plan should include seek to maximise affordable housing to meet current and future needs of residents.</p>	<p>The SA Framework needs to include objectives that relate to the choice, quality, diversity and affordability of housing.</p>
<b>Ipswich Transport Model Assessment, Aecom, 2010</b>			
<p>The Assessment was carried out to gain an understanding of the most appropriate transport solutions to cater for the overall scale of growth in Ipswich.</p>	<p>The target of this assessment was to evaluate the impact on Ipswich's transport network of future growth under a number of different scenarios (5):</p> <p>Do minimum</p> <p>Do minimum with development</p>	<p>The plan should seek to encourage people to leave their cars at home and promote sustainable modes of transport.</p>	<p>The SA Framework needs to include objectives that seek to improve opportunities to use sustainable modes of transport.</p>

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	<p>2021 with development and sustainable travel investment</p> <p>2021 with development, sustainable travel investment and with Northern bypass</p> <p>2021 with development, sustainable travel investment and wet deck crossing</p>		
Mid Suffolk District Council Core Strategy Focused Review adopted December 2012			
This document was produced as a focused review of the adopted Core Strategy (2008) to update certain sections with recent information.	To update certain sections of the 2008 Core Strategy.	The plan should seek to complement the vision, objectives and strategy within the Core Strategy – particularly as a residual number of homes required by residents in Ipswich would be constructed in neighbouring authorities.	The SA Framework should be mindful of the vision, objectives and strategy.
Babergh Core Strategy and Policies 2011-2031 (2014)			
The Core Strategy & Policies provides a high-level strategic plan for Babergh for 20 years from 2011-2031. The policies are intended to be broad and general, overarching policies outlining the strategy for growth and steering growth to sustainable locations.	No specific indicators or targets of relevance in this plan or programme.	The plan should seek to complement the vision, objectives and strategy within the Core Strategy – particularly as a residual number of homes required by residents in Ipswich would be constructed in neighbouring authorities.	The SA Framework should be mindful of the vision, objectives and strategy.
Community Cohesion Policy 2009			
This policy provides Ipswich Borough Council's position in respect of achieving community cohesion in Ipswich. It	No specific indicators or targets of relevance in this plan or programme.	The plan should include measures to promote	The SA Framework should include objectives

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>identifies the development of community cohesion as a result of engagement and empowerment in Ipswich.</p> <p>Objectives:</p> <p>Identify issues which undermine relations within and between community members.</p> <p>Select and initiate responses that address these issues in a proportionate and prioritised way.</p> <p>Ensure equality of opportunity.</p> <p>Integrate new arrivals into the community and build a sense of belonging.</p> <p>Promote understanding and acceptance between different community members.</p>		community.	that relate to promoting community cohesion.
<b>Equality and Diversity policy 2010</b>			
The policy sets out the Council's commitment to taking effective action to eliminate discrimination and to promote equality of opportunity and diversity in all that it does as an employer, a service provider and as a community leader.	No specific indicators or targets of relevance in this plan or programme.	The plan should seek to reduce discrimination and promote equality and diversity within Ipswich.	The SA Framework should include objectives that reduce discrimination and promote equality within Ipswich.
<b>A Fairer Ipswich Equality Scheme 2012-15</b>			
The purpose of this scheme is to set out a corporate equality and diversity strategy for the next 3 years and how Ipswich council intend to meet their Equality Duty under the Equality Act 2010.	<p>Staff are to undertake equality and diversity training to ensure they achieve the necessary competencies appropriate to their job roles in delivering the Council's Equality Duty.</p> <p>Set out clearly to our staff and customers why we are collecting information, how it will be used and more importantly to assure them of confidentiality and data security. Staff will receive training on obtaining information from customers in an appropriate and sensitive manner.</p> <p>Undertake equality analysis to help services identify any negative adverse impacts and to consider appropriate measures to mitigate the</p>	The plan should promote equality and reduce discrimination in the region.	The SA Framework should include objectives that relate to equality and discrimination.

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	risks of disadvantage and discrimination.		
Homelessness Strategy 2008-13			
The Homelessness Strategy re-affirms the Council's commitment to responding to the challenges set by central government by continuously improving services and working with partner agencies and stakeholders in order to prevent and alleviate homelessness and to help people maintain accommodation.	The key targets of this strategy are: Encourage homeless prevention Support vulnerable people Tackle the wider causes of homelessness Help people move away from rough sleeping Provide more settled homes	The plan should seek to reduce homelessness in Ipswich.	The SA Framework should include objectives that seek to reduce rough sleeping and homelessness in the area.
Ipswich Local Transport Plan (part of the Suffolk LTP, SCC 2011-2031)			
This plan outlines how transport will play its part in supporting and facilitating future sustainable economic growth by: <ul style="list-style-type: none"><li>• Maintaining (and in the future improving) our transport networks</li><li>• Tackling congestion</li><li>• Improving access to jobs and markets</li><li>• Encouraging a shift to more sustainable travel patterns.</li></ul>	The targets for this plan are: Maintain and, over time, improve Suffolk's transport networks Improve access to jobs and markets Reduce congestion	The plan should promote initiatives that reduce congestion and improve transport infrastructure.	The SA Framework should include objectives that seek to reduce congestion, provide new infrastructure (where required) and promote the use of sustainable modes of transport.
Ipswich Employment Land Availability Report 2012			
Extensive surveys are carried out annually for main employment areas, as identified through saved policies of the 1997 adopted Local Plan and the Proposals Map. Sites with current planning permissions for employment use are also monitored annually and updated in the report.	No specific indicators or targets of relevance in this plan or programme.	The plan should base the selection of new employment sites on this report.	The SA Framework should include objectives that support economic growth.
Ipswich Development and Flood Risk SPD 2014			
Guidance to facilitate the planning permission process is	No specific indicators or targets of relevance in this plan or programme.	The plan should seek to	The SA should include an

Regional, County and Local Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
provided in SPD particularly with regards to flood risk vulnerability and flood zone 'compatibility'. Flood resilient measures are also included as part of the guidance.		avoid development in Flood Zone 3.	objective directly related to managing flood risk.
Haven Gateway Green Infrastructure Study 2008			
The strategy appraises and identifies standards for delivering enhancements to the existing ANG network. The criteria for defining Accessible Natural Greenspace (ANG) were developed. The existing ANG provision was appraised to identify deficiencies in provision based on four accessible natural greenspace standards (as developed by English Nature [now Natural England] in 2003, adapted by the Town and Country Planning Association and agreed by the Steering Group).	The following set of standards (based on those promoted by the Town and Country Planning Association) has been used. People should have access to: • 2ha+ of ANG within 300m of home – this has been termed the Neighbourhood Level • 20ha+ of ANG within 1.2km of home – the District Level • 60ha+ of ANG within 3.2km of home – the Sub-regional Level • 500ha+ of ANG within 10km of home – the Regional Level	The plan should ensure that sufficient land is allocated for greenspace / open space and where necessary improve access.	The SA should take into consideration the proximity of new development to open space and green infrastructure and seek improve access further.
Open Space and Biodiversity Policy / Strategy 2013 - 2023			
The Open Space and Biodiversity Policy examines the provision of open space in terms of its quantity, quality, accessibility and management, identifying opportunities to increase supply, improve standards and satisfy demand. The Open Space and Biodiversity Policy underlines the importance of this land asset in meeting social and environmental needs, providing a very cost effective way of delivering a variety of benefits across all sections of the community and serving as a 'quality of life' indicator.	In terms of the provision of shading and greening, Ipswich Borough currently has approximately 12% tree canopy cover. Currently Ipswich does not have a time related tree canopy cover goals. A realistic standard to aim for in Ipswich is 22% by 2050.	The plan should ensure that sufficient land is allocated for greenspace / open space and where necessary improve access.	The SA should take into consideration the potential loss of open space and canopy cover due to new development and provide suggestions to mitigate this.

# Appendix B

---

## Baseline Data



## B. The Sustainability Baseline

### 7.1 Population

The following baseline indicators have been used to identify key population trends and characteristics:

- Total population (2011 Census and Neighbourhood Statistics<sup>8</sup>).
- Projected population growth to 2035 (Office for National Statistics Local Profiles<sup>9</sup>).
- Area of Ipswich Borough (Office for National Statistics Local Profiles).
- Population density (Office for National Statistics Local Profiles).
- Age structure of the population (Office for National Statistics Local Profiles and 2011 Census).
- Mean household size (Strategic Housing Market Assessment Ipswich Borough Council, Data Review June 2012).
- Percentage of single pensioner households (Neighbourhood Statistics<sup>10</sup>).
- Ethnic groups represented in the population (Office for National Statistics Local Profiles).

Ipswich has the highest population of all the districts within Suffolk. The population of the Borough has increased 1.4% per year since 2001, and between 2011 and 2013 from 128,300 people to 134,700, an increase of 6,400 (representing 5%). Ipswich has a relatively young population with 87,600 (65.7%) of working age which is 5% more than the average for the rest of Suffolk. Table B-1 below indicates the trend in population growth from 2001 to 2013. Table B-1 shows a relatively high level of growth across the Borough which is an indication why such a large number of new homes is considered necessary within Ipswich. The increase in population resulted from a mix of natural change (births – deaths) and net migration.

**Table B-1 Population Change**

Date	Population Estimate	Difference
2013*	134,700	+1,300
2011	133,400	+5,100
2010	128,300	+1,700
2009	126,600	+1,200

8

<http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?adminCompAndTimeId=28121%3A345&a=7&b=277113&c=ipswich&d=13&r=1&e=13&f=26822&o=131&q=487927&i=1001x1003x1004x1005&l=1818&m=0&s=1345628607823&enc=1>

9 <http://www.neighbourhood.statistics.gov.uk/dissemination/Info.do?page=analysisandguidance/analysisarticles/local-authority-profiles.htm>

10

<http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=277113&c=ipswich&d=13&e=16&q=487927&i=1001x1003x1004&o=1&m=0&r=1&s=1345632289120&enc=1&dsFamilyId=135>

4 <https://www.nomisweb.co.uk/reports/lmp/la/1946157241/report.aspx>

Date	Population Estimate	Difference
2008	125,400	+2,300
2007	123,100	+800
2006	122,300	+700
2005	121,600	+2,100
2004	119,500	+1,400
2003	118,100	+700
2002	117,400	+200
2001*	117,200	-

\*Populations are not estimates they are from the 2011 and 2001 Censuses and ONS Nomis

Source: Neighbourhood Statistics and the 2001 and 2011 Census and ONS Nomis

It is estimated that between 2010 and 2035, the population of the Borough will increase by 20.8% (Suffolk - 18.6%).

The Borough of Ipswich covers an area of 39km<sup>2</sup>. In 2010, the population density of Ipswich was 3,254 people per km<sup>2</sup>, significantly higher than the population density for Suffolk (189 people per km<sup>2</sup>) and that for England (401 people per km<sup>2</sup>). The Borough's fairly high population density trend is anticipated to continue to 2035 based on projected population growth rates.

According to the 2011 Census, the population of the Borough continues to be heavily skewed to the 25-29 age cohort. Figure B-1 presents the age structure of the Borough based on 2011 mid-year statistics.

**Figure B-1 Population Structure of Ipswich**

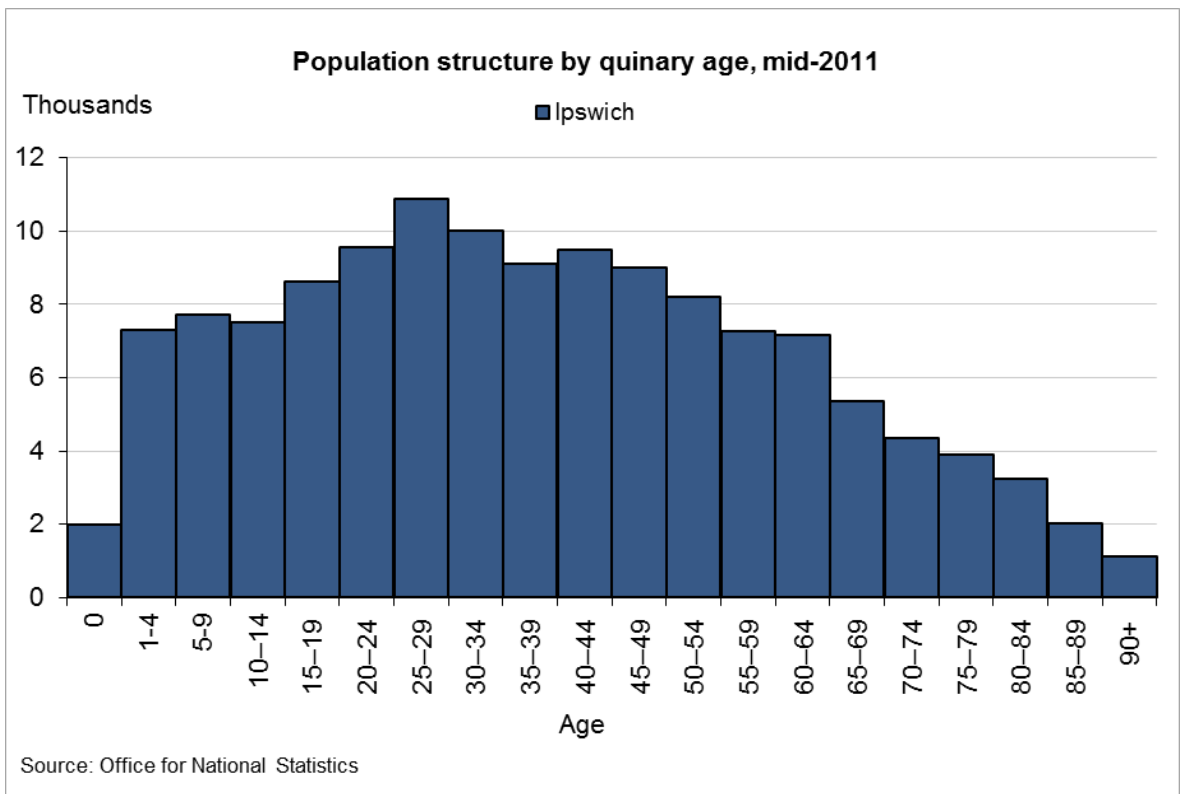
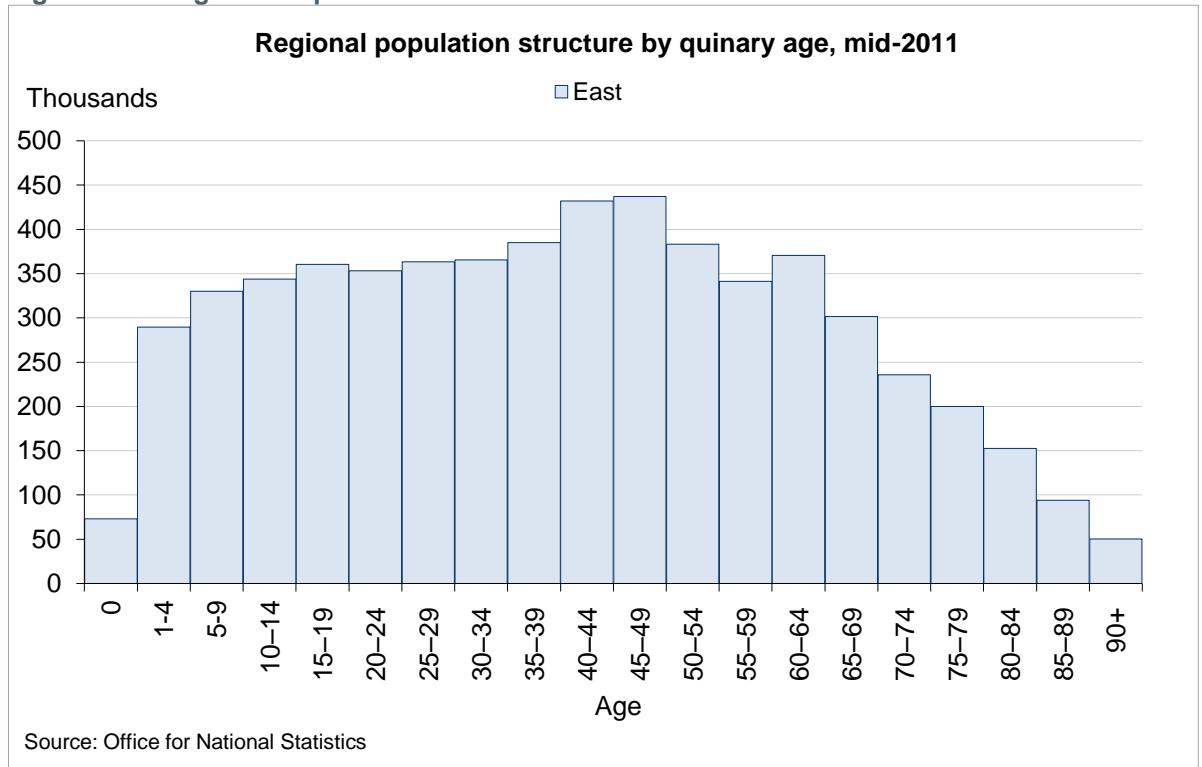


Figure B-2 presents the East of England regional age structure based on the 2011 mid-year statistics.

**Figure B-2 Regional Population Structure**



The average household size in the East of England stood at 2.29 people per household in the 2011 Census and it is anticipated it will be about 2.17 by 2033 (Strategic Housing Market Assessment Ipswich Borough Council, Data Review June 2012). By 2033, the most common household type will be one person living alone; currently there are 6,750 of those over 65 who live in one person households. These single people will constitute nearly 50% of all households, with the actual number nearly doubling over the next twenty-five years. The number of lone parent households will have increased substantially too. Couple households with one or more other adult will see a decline of 20% as will “Other households” (includes lone parent households with all children non dependant) which are predicted to decrease by a third.

Ipswich has a relatively multicultural population. 2011 Census data indicated that 88.9% of the population of Ipswich were white, which is slightly lower than that for the East of England (90.8%) and slightly higher than that for England (87.1). Asian / Asian British are the main ethnic minority within Ipswich, representing 4.8.3% of the population (Population Estimates by ethnic group, Office for National Statistics).

## Data Gaps and Uncertainties

- Population and household forecasts vary according to the assumptions made, but tend to be upwards. The projections used for this assessment are based on data and models included in Strategic Housing Market Assessment Ipswich Borough Council, Data Review June 2012.

## 7.2 Education and Qualifications

The following baseline indicators have been used to characterise levels of education and attainment in the Borough:

- Percentage of pupils achieving five or more GCSEs at Grades A\* - C (including Mathematics and English) or equivalent (Office for National Statistics Local Profiles).
- Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles).
- Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles).
- Most Deprived LSOAs for education, skills and training (ONS 201 Indices of Multiple Deprivation)

During the 2012 – 2013 school year in Ipswich 48.8% of pupils at the end of Key Stage 4 were achieving 5+ A\*-C including English and Mathematics, which is less than the average for the East of England (59.7%) and England (60.6%).

Levels of educational attainment show a clear link to levels of affluence in later life, as access to employment improves with academic success. In 2010, there were 9,000 people in Ipswich with no qualifications; accounting for 11% of the population aged 16 to 64. Those with no qualifications in the East of England accounted for 10.8% of the population and within England 11.1%. Therefore this shows that Ipswich's performance is average. In 2010, 31.9% of the population aged 19 - 64 (male) / 16 - 59 (female) had at least a Level 4 NVQCL1 qualification not significantly different from the East of England region.

Low skill levels, and the mismatch between supply and demand has long been a barrier to growth in Suffolk. According to the Suffolk Growth Strategy many young people have a limited understanding of work, the economic opportunities in Suffolk and how to be well prepared to secure employment. Employers' state that one of the most critical factors to their business is being able to recruit people with the right personal skills for employment: literacy, numeracy, responsibility, communication and problem solving abilities.

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).

It should be noted that Ipswich is home to University Campus Suffolk and Suffolk New College.

### Data Gaps and Uncertainties

- There are no significant gaps or uncertainties identified for this topic.

### Key Issues and Opportunities

- Educational attainment across Ipswich is below the national average. Although the percentage of the population holding recognised qualifications is average across Ipswich, it is considered that low skill levels and the mismatch between supply and demand of qualified young people is one of the main barriers to economic growth.
- There is a need to improve educational attainment in the Borough. By improving levels of educational attainment there could be wider social benefits and improvements to the local economy. However, there are limitations as to how far the DPDs could contribute to improving educational attainment.

## 7.3 Health

The following baseline data has been used to identify key trends:

- Percentage of the resident population who consider themselves to be in good health (2011 Census).
- Life expectancy at birth for males and females for the period 2009 – 2011 (Office for National Statistics Local Profiles).
- Distribution of and GPs and dentists (Ipswich Borough Council).
- Distribution of sports facilities (Active Places<sup>11</sup>).
- Percentage of people participating in regular sport or exercise (defined as taking part on at least 3 days a week in moderate intensity sport and active recreation for at least 30 minutes continuously in any one session) (Sport England Active People Survey 5).
- Conception rate of under-18 year olds (per 1,000) (Office for National Statistics Local Profiles).
- Most Deprived LSOA for health deprivation and disability (ONS 201 Indices of Multiple Deprivation)
- Play and open space quality, quantity and accessibility (Ipswich Open Space, Sports and Recreation Facilities Study 2009)

The health of people in Ipswich is mixed compared with the England average. Deprivation is higher than average and about 5,600 children live in poverty. In addition, life expectancy is 8.6 years lower for men in the most deprived areas of Ipswich than in the least deprived areas. Over the last ten years, all cause mortality rates show no clear trend and the early death rate from heart disease and stroke has fallen and is similar to the England average. Priorities in Ipswich include narrowing health inequalities and reducing early deaths (e.g. from cancer), ensuring children get the best start in life and supporting older people to remain independent and active.

Suffolk has a seemingly high rate of adults over 18 suffering from depression (14.5%). The GP practices at Barack Lane (26.7%) and Norwich Road (19.9%) have the highest rates

Life expectancy from birth for females in Ipswich (83.2 years) is slightly less than that for the East of England (83.6 years). However, there is no significant difference in life expectancy at birth for males in Ipswich and the East of England. Table B-2 presents these findings.

**Table B-2 Life Expectancy at Birth 2005 -2011**

	2005-2007		2006-2008		2007-2009		2008-2010		2009-2011	
	Males	Females	Males	Females	Males	Females	Males	Females	Males	Females
Ipswich	78.0	82.7	78.0	82.7	78.1	82.7	78.2	82.5	78.9	83.2
East of England	78.7	82.6	78.9	82.7	79.3	83.0	79.6	83.2	79.9	83.6
England	77.7	81.8	77.9	82.0	78.3	82.3	78.6	82.6	78.9	82.9
Suffolk	79.2	83.1	79.4	83.4	79.6	83.5	79.9	83.6	80.3	84.0

Source: Neighbourhood Statistics, Office for National Statistics

<sup>11</sup> <http://www.activeplaces.com/Index.asp?Authorise=true>

At the time of the 2011 Census, 45.6% of the Ipswich Borough considered themselves to be in very good health, compared to 47.2% in the East of England and 47.2% in England and Wales. This subjective data indicates that the health of the Borough population is slightly below regional and national levels.

The teenage pregnancy rate in the Ipswich Borough in 2007 was 48.9 per 1000, compared to 33.1 per 1000 across the East of England and 41.7 per 1,000 in England as a whole. This represents an increase from 44.0 per 1000 in 2006.

Alexandra, Westgate, Whitton, Gainsborough, Gipping and Stoke Park wards all have LSOAs within 20% of the most deprived for health deprivation and disability.

Ipswich has a large proportion (10.2%) of 'Retirement Home Singles' aged 81+ which require leisure activities. The large amount of open space in the surrounding districts and the presence of parks within the Ipswich Borough provide an excellent recreational resource for the population that should be maintained / enhanced to secure health benefits. According to the Ipswich Open Space, Sports and Recreation Facilities Study 2009 overall provision of open space sites in Ipswich is considered to be very good especially in relation to parks. However, issues with accessibility and locational deficiency were believed to exist, particularly in the north east of the Borough. A number of sites are deemed to lack character, such as on Bramford Lane.

Sports facilities across the Borough are found in and around Ipswich town centre and at the main sports centres. Research from Sport England indicates that 14.5% of people in Ipswich Borough engage in regular sport or exercise, higher than the 13.6% who do so in Suffolk but lower than the 16.3% national figure (Sport England, Active People Survey 5 (2010/11)). A significant proportion of the Ipswich population is falling in the category of people doing none or little exercise per week. Data indicates that almost 60% of female adults in Ipswich do no sporting activity; this compares to 47% for men.

The quality and quantity of indoor sports facilities was generally thought to be good. However, there are some notable issues in terms of the 'tired' condition of Crown Pools and the lack of a two court basketball hall with spectator seating and potentially a 50 metre swimming pool for elite swimming development. The leisure centres are generally perceived to be well used although there are car parking issues (Ipswich Open Space, Sports and Recreation Facilities Study 2009).

### Data Gaps and Uncertainties:

- Percentage of residents who are happy with their neighbourhood as a place to live.

## 7.4 Crime

The following baseline data has been identified:

- Crime rates per 1000 of the population for key offences including burglary (Office for National Statistics Local Profiles).
- Proportion of people experiencing hate crime (State of Ipswich Report May 2011)

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. Out of the 1185 violence with injury offences recorded, 709 of these were experienced in the night-time economy hours, measured during the hours of 18:00-06:00. Shoplifting has also increased in Ipswich by 102 (6.8%) offences from 2009/10 to 2010/11. This appears to have been an ongoing trend up to and during the recession, although there is no robust evidence of a direct correlation. Thefts from motor vehicles have increased over the same period by 261 incidents (33.4%).

Ipswich also has the highest prevalence of organised crime in Suffolk, including people trafficking, drug dealing and prostitution. Anti-social behaviour also formed a large percentage of crime incidents in Ipswich as of June 2012 (State of Ipswich Data, Ipswich Borough Council).

The proportion of people experiencing hate crime, based on race and religion, has increased in recent years. Hate crime based on religion has increased 4 fold between 2008 and 2009 while the incidents reported under disability and sexual orientation have maintained at a steady level.

In 2008/09 the overall crime rate<sup>12</sup> in Ipswich (71.2) was significantly higher than county (37.4), regional (40.4) and national levels (49.7). However, this reduced to 59.5 in 2009/2010 and 58.2 in 2010/11. Table B-3 presents the recorded crime and notifiable offences in Ipswich (per thousand persons) for 2010/11. Those recorded crimes per 1000 of Ipswich's population have fallen from 106 in 2008-2009 to 77 in 2013-2014.

**Table B-3 Recorded Crime and Notifiable Offences (per thousand persons)**

2010/11	Violence Against the Person	Wounding or Other Act Endangering Life	Other Wounding	Harassment Including Penalty Notices for Disorder	Common Assault	Robbery	Theft from the Person	Criminal Damage Including Arson	Burglary in a Dwelling	Burglary Other than a Dwelling	Theft of a Motor Vehicle	Theft from a Motor Vehicle
Ipswich	26	1	9	8	6	1	1	20	4	6	2	8
East of England	12	0	5	3	3	1	1	11	4	4	2	5
England	15	0	6	3	4	1	2	12	5	5	2	6

Source: Notifiable Offences Recorded by the Police, Home Office 2010/11

## Data Gaps and Uncertainties

- Percentage of people who feel safe in the place where they live.
- Percentage of people who feel their area is safe with low levels of crime and disorder.

## 7.5 Water

The following baseline indicators have been used to characterise the water environment in the Borough:

- River catchment areas (Environment Agency East Suffolk Catchment Flood Management Plan, 2009).
- Historic flood events (Ipswich Borough Council Strategic Flood Risk Assessment 2007).
- Distribution of areas at risk of fluvial flooding (Environment Agency Flood Map<sup>13</sup>) and 2010/11 Annual Monitoring Report, Ipswich Borough Council).

<sup>12</sup> British Crime Survey Comparator shows the overall crime rate per thousand persons.

<sup>13</sup> [http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=616500.0&y=244500.0&topic=floodmap&ep=map&scale=9&location=Ipswich,Suffolk&lang=\\_e&layerGroups=default&distance=&textonly=off#x=616500&y=244500&lg=1,&scale=8](http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=616500.0&y=244500.0&topic=floodmap&ep=map&scale=9&location=Ipswich,Suffolk&lang=_e&layerGroups=default&distance=&textonly=off#x=616500&y=244500&lg=1,&scale=8)

- Number of planning applications granted permission contrary to Environment Agency advice (Ipswich Local Plan Authority Monitoring Report 9, 2012-2013).
- Water and groundwater quality (Environment Agency<sup>14</sup>)

Water is an essential resource required for both domestic and industrial use. The Borough lies within the 'East' catchment area. The key watercourses in the Borough are the River Gipping and Belstead Brook which both flow into the River Orwell (Environment Agency River East Suffolk Catchment Flood Management Plan).

The Environment Agency has identified a risk of flooding on lands adjacent to the River Gipping, Belstead Brook and the small watercourse located within the northern part of the Northern Fringe area 'Westerfield Watercourse' (Environment Agency's online Flood Map). Westerfield Watercourse flows westwards from Westerfield village towards the Gipping at Claydon and Areas of undeveloped land including the Council's Millennium Cemetery in the North of Ipswich fall within its catchment.

In 2013/14 the Environment Agency was consulted 19 times and no objections to proposals were raised (Ipswich Borough Council, September 2014).

In 2012/13 the EA was advised of 21 applications in Ipswich where flood risk or water quality was an issue. Of these, 16 were approved, one was withdrawn, three were refused, and one has been approved contrary to the EA's initial objection. Whilst an objection was raised by the EA, this was owing to the lack of a Flood Risk Assessment (FRA) rather than an in principle objection to the proposed development. In this case the former fire station development on Sidegate Lane was approved for 59 dwellings subject to relevant EA planning conditions (Ipswich Local Plan Authority Monitoring Report 9, 2012-2013).

Ipswich Borough Council's Strategic Flood Risk Assessment indicates that major surge tides occurred in 1236, 1287, 1613, 1619, 1762, 1894, 1904, 1905, 1927/8, & 1938. However, these would not have caused great damage as town's marshes were not built on. Flood defences built between 1971 and 1983 prevented serious surge tide flooding on 2/3 January 1976, 11/12 January 1978 and 1 February 1983. The most recent severe fluvial events were in 1947 and 1939. These were partly caused by flood debris that obstructed the old "Seven Arches Bridge" at London Road. The current replacement bridge is single span and no longer obstructs the flow.

## Date Gaps and Uncertainties

- Daily domestic water use (per capita consumption, litres).

## 7.6 Soil and Land Quality

The following baseline indicators have been used to characterise the soil and land quality conditions across the Borough:

- Distribution of best and most versatile agricultural land ([www.magic.gov.uk](http://www.magic.gov.uk)).

---

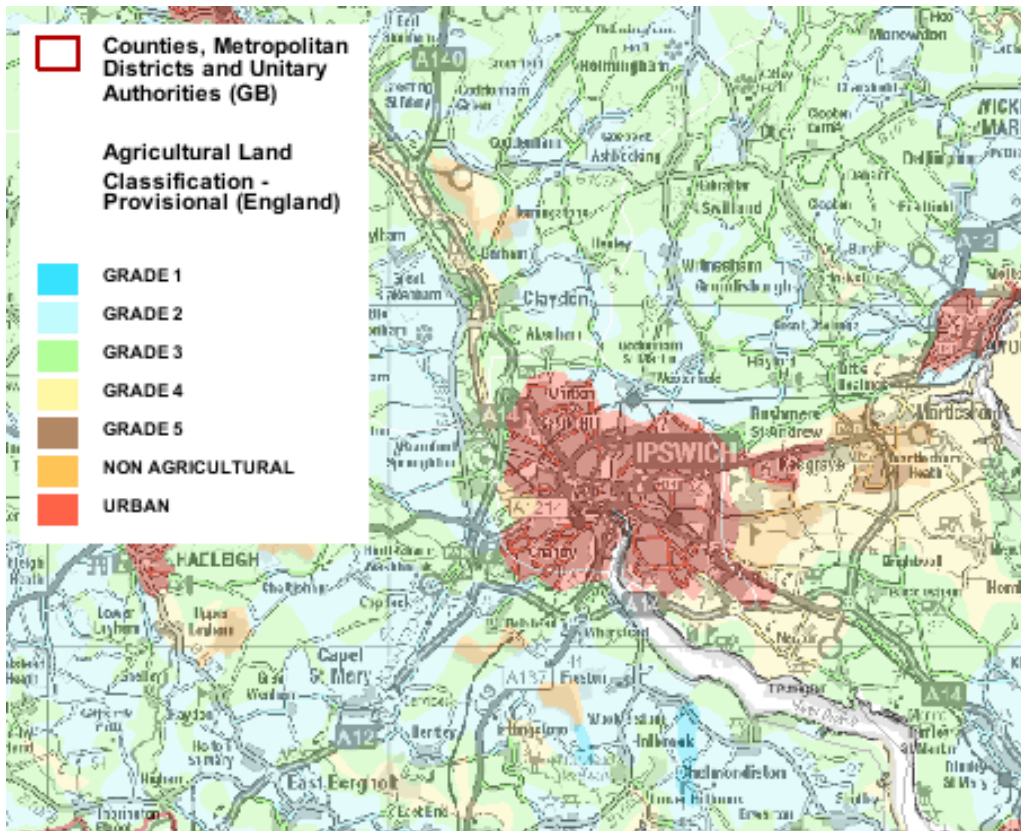
<sup>14</sup> <http://maps.environment-agency.gov.uk/wiyby/wiybyController?topic=groundwater&layerGroups=default&lang=e&ep=map&scale=8&x=616500&y=244500#x=616500&y=244500&lg=1,&scale=7>



- Amount (hectares) of previously developed land available (Office for National Statistics Local Profiles).
- Density of new development (Annual Monitoring Report 2011-2012)

Most of the Borough is covered by urban development. However, Figure B-3 indicates that the undeveloped areas within the Borough lie predominantly on Grade 2 Agricultural Land. Grade 2 Agricultural Land is very good quality agricultural land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than Grade 1. Grade 2 Agricultural Land is also classed as best and most versatile land.

**Figure B-3 Agricultural Land Classification**



Source: [www.magic.gov.uk](http://www.magic.gov.uk)

In 2011/12, there was 67.2 hectares vacant or derelict land. (141.8 hectares total including sites in use, allocated or with planning permission) (Ipswich National Land Use database 2014).

In 2009 there were 130 hectares of land that were unused or may be available for redevelopment in Ipswich. This reflects the high density urban environment of the Ipswich Borough. Table B-4 presents the results.

**Table B-4 Previously-developed land**

	Vacant land (ha)	Vacant buildings (ha)	Derelict land and buildings	Land currently in use with known redevelopment potential (ha)	Land that is unused or may be available for redevelopment (ha)
<b>Ipswich</b>	20	30	0	20	130

<b>East of England</b>	1,380	280	1,680	1,590	6,820
<b>England</b>	13,570	4,040	15,730	11,220	61,820

Source: Department for Communities and Local Government (DCLG)

The density of new build dwellings is 45.2 per hectare or 55.2 per hectare if including the assisted living units on Handford Road (Ipswich Borough Council, September 2014).

Out of 219 dwelling units completed within new build developments between April 2011 and March 2012:

- 0 were developed at less than 30 units per hectare (0% of units)
- 110 were developed at between 30 and 50 units per hectare (50% of units)
- 109 were developed at over 50 units per hectare (50% of units).

The average net density of land covered by the 219 units is 54.1 units per hectare.

There are some sites in Ipswich identified as potentially being contaminated, mainly associated with existing or former industrial areas. There are also a number of historic landfill sites across the Borough, primarily located within the urban area. Contamination on development sites is dealt with through the development management process. An example of a contaminated site which has been redeveloped successfully for its current use is the former Crane's factory site.

## Data Gaps and Uncertainties

- There are no significant gaps or areas of uncertainty for this topic.

## 7.7 Air Quality

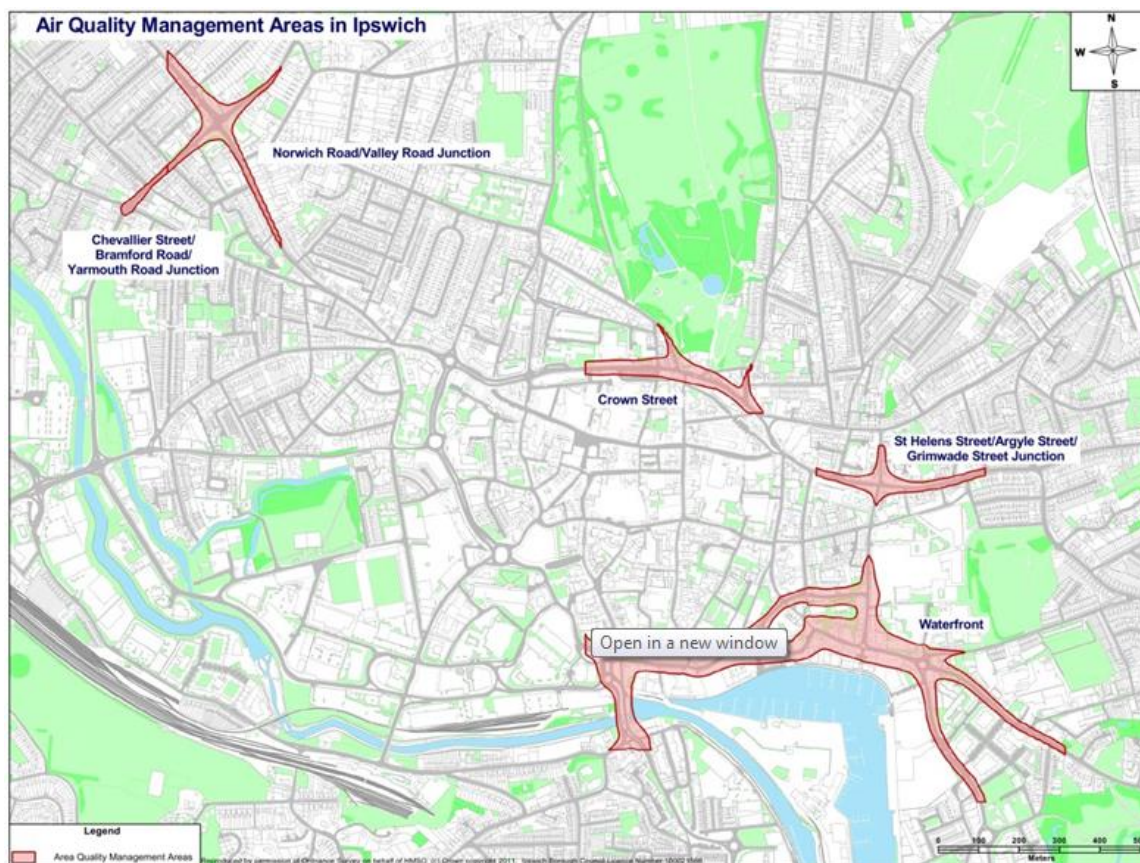
The following baseline indicators have been used to identify environmental conditions and key trends:

- Number and distribution of Air Quality Management Areas (AQMAs) (Air Quality Archive<sup>15</sup>)

Air quality affects the state of the natural environment and has implications for human health. It is estimated that air pollution attributed to 5.6% (63) of all deaths in 2010 from the population of Ipswich aged 25 and over. AQMAs are designated when local authorities have identified locations where national air quality objectives are unlikely to be achieved. There are four AQMAs within the Ipswich Borough and all have been declared due to levels of NO<sub>2</sub>. Their locations are presented on Figure B-4.

<sup>15</sup> [http://aqma.defra.gov.uk/aqma-details.php?aqma\\_id=442](http://aqma.defra.gov.uk/aqma-details.php?aqma_id=442)

Figure B-4 Air Quality Management Areas in Ipswich



The main source of air pollution in the Borough is road traffic (2010 Air Quality Detailed Assessment for Ipswich Borough Council). Ipswich continues to get exceedances of the annual average objective level for Nitrogen Dioxide in the AQMAs St Helen's Street and St Matthew's Street/Civic Drive.

Issues relating to carbon dioxide emissions are addressed in Section B.8.

## Data Gaps and Uncertainties

- Dwellings affected
- Long term trends are uncertain.

## 7.8 Energy and Climate Change

The following baseline indicators have been used:

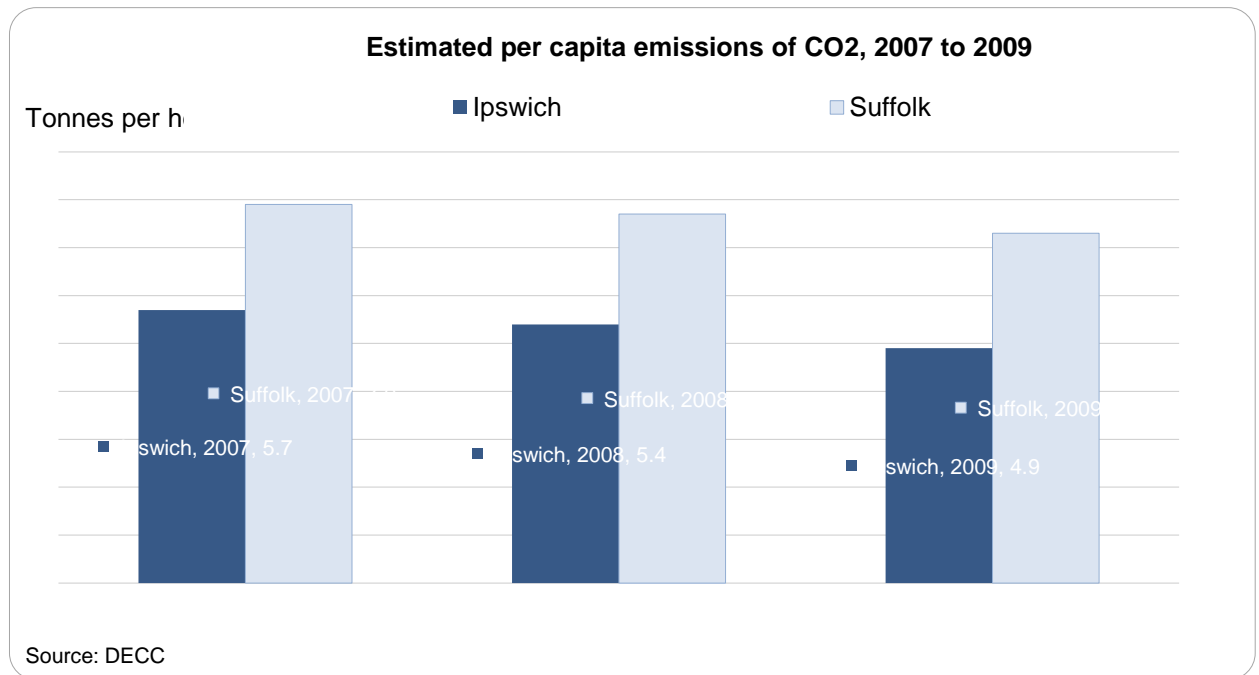
- Total carbon dioxide (CO<sub>2</sub>) emissions per capita (DECC and Ipswich Local Plan Authority Monitoring Report 9, 2012-2013)
- Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles).
- All energy consumption by sector (Office for National Statistics Local Profiles and DECC).
- Applications for renewable energy developments (2010/11 Annual Monitoring Report Ipswich Borough Council).

Although climate change is a global phenomenon, action to avoid its most serious effects and to minimise the emission of greenhouse gases needs to occur at a local level. The Borough will

not be immune to the impacts of climate change, either directly or as a result of policy responses at the national and international levels.

In 2011, the estimate of CO<sub>2</sub> emissions for Ipswich was 4.2 tonnes per capita (Dept of Energy & Climate Change, 2011 data). When compared with CO<sub>2</sub> emissions per capita for Suffolk in 2009, Ipswich performed better; this is shown in Figure B-5.

**Figure B-5 Estimated CO<sub>2</sub> Emissions Per Capita.**



In 2010 the estimate of CO<sub>2</sub> emissions for Ipswich per capita shows no change from the previous year. Ipswich Borough Council is committed to reducing its carbon emissions from the 2007/08 baseline by 30% by 2013 and by 50% by 2021. This equates to over 3,000 tonnes of CO<sub>2</sub> the equivalent of the output of 300 homes (Ipswich Borough Council, Impact Carbon Management Plan 2009). During the period 2005-2011 CO<sub>2</sub> emissions in Ipswich reduced by 28.8% to 4.2 tonnes per capita. If the level of reduction seen up to 2013 continues it is expected that the areas targets for CO<sub>2</sub> reductions will be met (Ipswich Local Plan Authority Monitoring Report 9, 2012-2013).

In 2009, the average consumption of ordinary domestic electricity for Ipswich was 3,440 kWh per meter point, which is lower than the regional average of 3,980 kWh. Since 2007 there has been a reduction in domestic electricity usage of 149 kWh per meter point in Ipswich, which compares with a regional decrease of 159 kWh. Similarly, in 2009 the average consumption of domestic gas in Ipswich was 13,640 kWh per meter, which was lower than regional averages (15,471 kWh). Gas consumption in Ipswich between 2007 and 2009 has also reduced by 1,864 kWh per meter point.

Transport consumption of energy in Ipswich in 2009 was 399 gWh. This accounted for 0.3% of all energy consumption in the East of England region. Domestic energy consumption accounted for the majority of energy consumption in Ipswich in 2009 (914 gWh). This data is presented in Table B-5.

**Table B-5 Energy consumption by sector**

	Total	Industry and commercial	Domestic	Transport
	gWh	gWh	gWh	gWh
Ipswich	2,040	697 (34%)	914 (44%)	399 (20%)
East of England	137,894	48,473 (35%)	44,688 (32%)	44,305 (33%)
England	1,228,781	442,903 (36%)	416,703 (34%)	348,118 (29%)

Source: DECC

There were no applications for renewable energy developments in 2013/14 (Ipswich Borough Council, 2014).

During Ipswich Borough Council's 2010/11 monitoring period planning permission was granted for one domestic and one business related solar panel installation. These developments were capable of generating 1.5kWh and 3,301kWh respectively and have now both been installed. In addition, there were numerous solar panels installed under permitted development rights.

The Planning and Energy Act 2008 allows local authorities to include policies in their local development plans setting out reasonable requirements for:

- A proportion of energy used in development in their area to be energy from renewable sources
- A proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development

The above policies should be carefully considered and balanced in the DPDs with the need to ensure that the environment of the Borough is not adversely affected.

In terms of the provision of shading and greening, Ipswich Borough currently has approximately 12% tree canopy cover.

### Data Gaps and Uncertainties

- Level of energy efficiency in homes

## 7.9 Biodiversity, Flora and Fauna

The following baseline indicators have been used to characterise conditions across the Borough and within Ipswich:

- Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and County Wildlife Sites (CWS) (MAGIC, SBRC, [www.magic.gov.uk](http://www.magic.gov.uk)).
- Areas of woodland, including ancient woodland ([www.magic.gov.uk](http://www.magic.gov.uk)).
- Key Biodiversity Action Plan (BAP) species and habitats present (Suffolk BAP).
- Geodiversity sites ([www.geosuffolk.co.uk](http://www.geosuffolk.co.uk))

Ipswich contains a number of biodiversity sites of international, national, regional and local importance for nature conservation, as shown in Map 1 Sites of Ecological Importance.

There are three SSSIs located within the Borough; Stoke Tunnel Cutting (2.2ha), Bixley Heath (5.08ha) and the Orwell Estuary (1335.52ha). SSSIs represent the Country's very best wildlife

and geological sites. The Orwell Estuary is also designated as a SPA under EC Wild Birds Directive<sup>16</sup> due to its importance for estuarine bird populations. In addition the estuary is also an internationally designated Ramsar site.

Ipswich also contains six LNRs and 19 CWSs. There was a net loss of biodiversity in 2010/11 of 0.15 hectares at the Wharfedale Road Meadow CWS (2010/11 Annual Monitoring Report Ipswich Borough Council).

There is one area of ancient and semi-natural woodland along with ancient replanted woodland to the south of the Borough.

The UK government published 'Biodiversity: The UK Action Plan' in 1994. This plan combined new and existing conservation initiatives with an emphasis on a partnership approach. It contains 59 objectives for conserving and enhancing species and habitats as well as promoting public awareness and contributing to international conservation efforts. Following on from the initial strategy publication, 391 Species Action Plans (SAPs) and 45 Habitat Action Plans (HAPs) were published for the UK's most threatened (i.e. "priority") species and habitats. In addition, there are approximately 150 Local Biodiversity Action Plans, normally at county level. These plans usually include actions to address the needs of the UK priority habitats and species in the local area, together with a range of other plans for habitats and species that are of local importance or interest (Biodiversity Action Reporting System<sup>17</sup>).

The Suffolk BAP is made up of many individual species and habitat plans. Each plan gives information on the status and threats to the species or habitat. Suffolk BAP species and habitats include the following:

- **Habitat Action Plans**
  - Acid Grassland
  - Ancient and/or Species-rich Hedgerows
  - Cereal Field Margins
  - Coastal and Floodplain Grazing Marsh
  - Coastal Sand Dunes
  - Coastal Vegetated Shingle
  - Fens
  - Lowland Hay Meadows
  - Lowland Heathland
  - Lowland Mixed Deciduous Woodland
  - Maritime Cliffs and Slopes
  - Mudflats
  - Reedbeds
  - Saline Lagoons
  - Saltmarsh

---

<sup>16</sup> Council Directive 79/409/EEC on the conservation of wild birds

<sup>17</sup> <http://www.ukbap-reporting.org.uk/>

- Sea Grass Beds
- Eutrophic Ponds
- Traditional orchards
- Urban
- Wet Woodland
- Wood Pasture and Parkland
- **Species Plans**
  - Mammals
    - *Bats (grouped plan)*
    - *Brown hare Lepus europaeus*
    - *Dormouse Muscardinus avellanarius*
    - *European otter Lutra lutra*
    - *Harbour porpoise Phocoena phocoena*
    - *Red squirrel Sciurus vulgaris*
    - *Water vole Arvicola terrestris*
    - *Water Shrew Neomys fodiens*
  - Amphibians and reptiles
    - *Great crested newt Triturus cristatus*
    - *Natterjack toad Bufo calamita*
    - *Adder or Northern Viper Vipera berus*
  - Birds
    - *Bittern Botaurus stellaris*
    - *Grey partridge Perdix perdix*
    - *Skylark Alauda arvensis*
    - *Song thrush Turdus philomelos*
    - *Stone curlew Burhinus oedichnemus*
    - *Bullfinch Pyrrhula pyrrhula*
    - *Corn Bunting Miliaria calandra*
    - *Linnet Carduelis cannabina*
    - *Nightjar Caprimulgus europaeus*
    - *Reed Bunting Emberiza schoeniclus*
    - *Barn Owl Tyto alba*
    - *Spotted Flycatcher Muscicapa striata*
    - *Tree Sparrow Passer montanus*
    - *Turtle Dove Streptopelia turtur*
    - *Woodlark Lullula arborea*
    - *Little tern Sterna albifrons*

- Invertebrates
  - *Cornflower Centaurea cyanus*
  - *Greater Water-parsnip Sium latifolium*
  - *Shepherd's needle Scandix pectinvereris*
  - *Pillwort Pilularia globulifera*
  - *Red-tipped Cudweed Filago lutescens*
  - *Small-flowered Catchfly Silene gallica*
  - *Spreading Hedge-parsley Torilis arvensis*
  - *Tassel Stonewort Tolypella intricata*
  - *Tower Mustard Arabis glabra*
  - *Native Black Poplar Populus nigra ssp.betulifolia*
  - *Unspotted Lungwort Pulmonaria obscura*
  - *Man orchid Aceras anthropophorum*
- Plants
  - *Cornflower Centaurea cyanus*
  - *Greater Water-parsnip Sium latifolium*
  - *Shepherd's needle Scandix pectinvereris*
  - *Pillwort Pilularia globulifera*
  - *Red-tipped Cudweed Filago lutescens*
  - *Small-flowered Catchfly Silene gallica*
  - *Spreading Hedge-parsley Torilis arvensis*
  - *Tassel Stonewort Tolypella intricata*
  - *Tower Mustard Arabis glabra*
  - *Native Black Poplar Populus nigra ssp.betulifolia*
  - *Unspotted Lungwort Pulmonaria obscura*
  - *Man orchid Aceras anthropophorum*
- Lichens and fungi
  - *Orange-fruited elm-lichen Caloplaca luteoalba*
  - *Sandy stilt puffball Battarraea phalloides*
  - *Starry breck-lichen Buellia asterella*
  - *Oak Polypore Buglossoporus pulvinus*

Source: Suffolk BAP<sup>18</sup>

In 2012 UK Post -2010 Biodiversity Framework was issued to set a broad enabling structure for action across the UK between 2012 and 2020:

---

<sup>18</sup> <http://www.suffolkbiodiversity.org/biodiversity-action-plans.aspx>



- To set out a shared vision and priorities for UK-scale activities, in a framework jointly owned by the four countries, and to which their own strategies will contribute.
- To identify priority work at a UK level which will be needed to help deliver the internationally agreed targets and the EU Biodiversity Strategy.
- To facilitate the aggregation and collation of information on activity and outcomes across all countries of the UK, where the four countries agree this will bring benefits compared to individual country work.
- To streamline governance arrangements for UK-scale activity.

GeoSuffolk has designated 31 local geodiversity sites in Suffolk, 8 of these are Regionally Important Geological Sites (RIGS) and 23 are the new County Geodiversity Sites (CGS). All of these have public access. The list of geodiversity sites in Ipswich is presented in Table B-6 below.

**Table B-6 Geodiversity sites in Ipswich**

Site Name	Details
Blackfriars	London Clay septaria used as building stone.
Chantry Park Mansion	Ransomes stone (artificial)
Christchurch Park	Springs and seepages
Christchurch Park Lower Arboretum	Sarsen stones in rockery
Coprolite Street	'Fossil Animal Dropping Street'
Holywells Park RIGS	Springs and seepages
Ipswich Museum	Terracotta fossils on the façade. Large stones in the courtyard
Pipers Vale (Orwell Country Park)	Rotational slips, estuary, cliffs (valley gravel exposed).
Stoke Bridge Pocket Park	Sarsen stones
Stoke Tunnel SSSI	Interglacial site (no section visible)
St Nicholas Church	London Clay septaria and other local building stones

Source: <http://www.geosuffolk.co.uk/>

## Data Gaps and Uncertainties

- There are no significant data gaps or uncertainties for this topic.

## 7.10 Cultural Heritage

The following baseline indicators have been used to characterise the cultural heritage baseline:

- Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens ([www.magic.gov.uk](http://www.magic.gov.uk)).

- Number of Listed Buildings / Scheduled Monuments / Conservation Areas and Registered Historic Parks and Gardens on English Heritage's 2011 Risk Register (English Heritage Scheduled Monuments at Risk East of England, 2011).
- Number of eligible open spaces managed to Green Flag standards (Civic Trust and Ipswich Borough Council).

In Ipswich there are 603 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. There has been little change in the number of listed buildings in the Borough since 1995.

There are also 14 Conservation Areas covering the historic areas of the Borough. As of 2012 all twelve of the Conservation Areas in the Borough had been the subject of character appraisals.

There are ten Scheduled Monuments within the Ipswich Borough. The Scheduled Monuments in the Borough range from a Dominican Friary (remains of) to middle and late Saxon assets. Scheduled Monuments in the Borough are largely located within the town centre.

English Heritage on behalf of the Government maintains the Register of Parks and Gardens of Special Historic Interest in England. These are designed landscapes that are considered to be of national importance. In Ipswich, the following parks and gardens are currently listed:

- Old and New Cemetery Grade II;
- Chantry Park Grade II; and
- Christchurch Park Grade II.

According to English Heritage's 2011 'At Risk' Register there are three statutory heritage assets considered to be 'at risk'. These assets include:

- St Mary at Quay, Quay Street, Ipswich, Grade II\* Listed Building and Conservation Area;
- Barrack Corner, Conservation Area; and
- Stoke, Conservation Area.

The Civic Trust and DCLG administer the Green Flag Award, given for the quality and management of parks and other public open spaces. Two of parks within the Borough have been accredited with the Green Flag status; Christchurch Park and Holywells Park (Ipswich Borough Council July 2011). These are also the only two eligible open spaces managed to Green Flag standards (Ipswich Borough Council, September 2014).

Improving the quality of the public realm is viewed as very important as it contributes to an experience of a place or location. A high quality public realm can attract inward investment and increase quality of life for the resident population.

## Data Gaps and Uncertainties

- Planning permissions adversely affecting known or potential designated assets (historic buildings, archaeological sites etc.).

## Key Issues and Opportunities

- Ipswich is home to a wealth of heritage assets including those of a national and local importance. Several sites within Ipswich are listed on the Sites and Monuments Record.
- In addition, there are a number of Listed Buildings and it should be ensured that new development does not have detrimental effect on the architectural or historic value of these heritage assets.
- Cultural heritage features across the Borough should be conserved and enhanced.

## 7.11 Landscape

The following baseline indicators have been used to characterise the existing conditions:

- Landscape characterisation (Suffolk Landscape Character Assessment, Suffolk County Council, <http://www.suffolklandscape.org.uk/>).
- Distribution and area of National Parks and Areas of Outstanding Natural Beauty (AONB) ([www.magic.gov.uk](http://www.magic.gov.uk)).
- Number of eligible open spaces managed to Green Flag standards (Civic Trust and Ipswich Borough Council).

The Suffolk Landscape Character Assessment identifies Ipswich town centre as urban, with some areas of ancient rolling farmlands to the north and northeast and estate sandlands to the east of the urban areas (Suffolk Landscape Character Assessment<sup>19</sup>).

No National Parks are located within the Borough's boundary ([www.magic.gov.uk](http://www.magic.gov.uk)). However, the Suffolk Coast and Heaths AONB is located within close proximity of the southern Borough boundary.

Christchurch Park, 33 hectares in size, was given its third Green Flag award in July 2010 and its fourth Green Flag award in July 2011 in recognition of its excellent use of green space, well-maintained facilities and high standard of safety and security. Holywells Park was awarded its first Green Flag award in July 2011. Currently the amount of public open space in Ipswich owned and/or managed by the Borough Council is 477 hectares. The County Council, other public agencies and private landowners own further accessible open space in the Borough. An open space, sport and recreation facilities study published in September 2009 provides a breakdown of open space by type (2010/11 Annual Monitoring Report, Ipswich Borough Council).

### Data Gaps and Uncertainties

- Percentage of new housing completions achieving design standards such as Building for Life and Lifetime Homes

## 7.12 Minerals and Waste

The following baseline indicators have been used to characterise the existing conditions:

- Amount of household waste collected per household (Defra).
- Location and number of waste facilities serving the Borough (Suffolk County Council).
- Data regarding the use of recycled and secondary materials in the construction industry (Suffolk County Council Waste and Minerals Annual Monitoring Report 2010/11).
- Household waste recycling and composting achieved (Defra).
- Number of planning applications relating to mineral development (Suffolk County Council, Minerals and Waste Annual Monitoring Report 2010/11).

The Suffolk Minerals and Waste Development Framework (MWDF) contains mineral and waste specific policies for use in determining planning applications for waste or quarry developments in Suffolk. It sets out the strategy for future minerals and waste development and addresses

---

<sup>19</sup> [http://www.suffolklandscape.org.uk/landscape\\_map.aspx](http://www.suffolklandscape.org.uk/landscape_map.aspx)

issues including mineral extraction; waste management and recycling; protecting mineral resources and restoring minerals and waste sites ([www.suffolk.gov.uk](http://www.suffolk.gov.uk)).

In Ipswich, 499kg of residual waste was recorded per household in 2012/13. This is less than the waste per household in the East of England (525kg) and England overall (568kg). From 2010/11 to 2011/12, the amount of residual waste in Ipswich reduced on average by 13kg per household compared with a reduction of 30kg for the East of England region (Defra).

In 2012/13 40.8% of waste in Ipswich was recycled and composted (Ipswich Borough Council, September 2014). Reuse / recycling / composting rates were lower than those recorded for Suffolk, the East of England and England between 2008-2012. (results are presented in Table B-7) (Defra).

**Table B-7 Household Waste Recycling and Composting Achieved**

	Rate Achieved 2008/09 (%)	Rate Achieved 2009/10 (%)	Rate Achieved 2010/11 (%)	Rate Achieved 2011/2012 (%)
Ipswich	41.1	40.2	42.0	42.5
Suffolk	48.4	50.6	53.8	53.2
East of England	44.5	46.1	48.8	49.7
England	37.6	39.7	41.2	43.0

Source: Defra, national and regional figures were collected from the Waste Statistics on Defra's website.

Waste disposal is an important strategic issue for Suffolk. Suffolk County Council's adopted (March 2011) Waste Core Strategy identifies the following waste facilities within and within close proximity of Ipswich:

- Ipswich Hospital (incinerator with energy recovery) NB clinical waste;
- Ipswich Composting Facility;
- Ipswich Household Waste and Recycling Facility;
- Cliff Quay Anglian Sewage Treatment Works;
- Bramford Quarry (Non-Hazardous Landfills);
- Cook Transfer Station (Waste Transfer Facility);
- Valley Farm Pit (Secondary Aggregates);
- F. A. Edwards & Son Ltd (Metals/End of Life Vehicles);
- F J Metals (Metals/End of Life Vehicles); and
- Whip St Motors (Metals/End of Life Vehicles).

The Suffolk Annual Waste Survey 2009 indicated sales of recycled aggregate to be 257,497 tonnes, and this was less than the average yearly forecast of approximately 500,000 tonnes, identified in the Minerals Core Strategy. This also reflected the downturn in the economy. During 2010/11, one application at Waldringfield (outside of Ipswich) was received for minerals extraction. To reduce the need for natural resources, recycled and secondary materials should be used where feasible in construction projects and new development.

## Data Gaps and Uncertainties

- There are no key data gaps or uncertainties.

## 7.13 Transportation

The following baseline indicators have been used to characterise the existing conditions across the Borough:

- Distribution of major transport systems – roads, airports, ports, rail etc. (Ordnance Survey mapping, Ipswich Borough Council, Suffolk County Council).
- Journey to work by mode (2011 Census).
- Number of housing developments of ten or more dwellings approved and located within 30 minutes travel time of a GP, primary and secondary school, employment area and major retail centre (Ipswich Borough Council 2010/11 Annual Monitoring Report).
- Road network capacity (Ipswich Travel Model Assessment, 2010)

Ipswich serves as an important employment centre for outlying areas with approximately 97,000 (Census 2011) people travelling to work each day in Ipswich. Central Ipswich is the destination for almost 50% of these journeys. In 2011, 7.4% of people in employment worked mainly from home and more than 50% of people travelled to work by car or van. The percentage of people working from home is lower than that for England (10.64%). The percentage of people travelling to work by car (53.44%) is similar to that for England (53.71%).

The use of buses (public transport) is significantly higher than regional and similar to national levels (see Table B-8). Walking exceeds regional and national levels. The Ipswich Community Strategy 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.

**Table B-8 Journey to Work By Mode**

Usual Journey to Work Mode	Ipswich (%)	East of England (%)	England (%)
Working mainly at or from home	7.40	11.07	10.64
Underground, light rail, metro or tram	0.09	1.12	3.94
Train	2.34	6.95	5.14
Bus, minibus or coach	7.57	3.64	7.30
Motorcycle, scooter or moped	1.09	0.77	0.79
Driving a van or car	53.44	58.16	53.71
Passenger of a van or car	6.78	4.90	4.88
Taxi or Minicab	0.34	0.42	0.48
Bicycle	4.58	3.43	2.86
On foot	15.99	9.07	9.76

Usual Journey to Work Mode	Ipswich (%)	East of England (%)	England (%)
Other	0.38	0.47	0.49

Source: Census 2011

18,300 pupils travel each day to the 52 schools in the wider Ipswich area. Three new education institutions catering for sixth form, further and higher education will contribute a further 10,420 students and 1,250 employees travelling in Ipswich (2011 State of Ipswich Report, Ipswich Borough Council).

Significant development within Ipswich could increase the transport pressures that currently exist within the town. Traffic modelling has shown that with the anticipated level of growth traffic could grow by over 15% by 2021. There will also be additional pressures on the A12/A14 at Copdock, Seven Hills Interchange and the Orwell Bridge. Significant housing development is also proposed within the Northern Fringe area and this, together with planned growth in Suffolk Coastal on the eastern fringe of the town will add significant pressure to radial routes leading to the town centre, the principal focus for employment. It will be important to ensure that transport is fully integrated with the development plans for these locations. Many peak hour journeys in Ipswich are fairly short and yet are carried out by car. Congestion levels are already seen as a significant problem (Suffolk County Council, Local Transport Plan 2011 – 2031; Ipswich Travel Model Assessment, 2010).

Bus service provision in Ipswich is generally good, and provides commercial services but there are some areas that are not well served. There are no orbital services so passengers wanting to skirt around the town have to travel into the centre and then out again. There is currently a lack of multi-operator ticketing which exacerbates this problem. The availability and pricing of car parking within the town is also an important factor in the travel choices that people make. More than half of long-stay parking capacity in the town is privately owned and much of it at little or no cost to users. The Ipswich – Transport fit for the 21st Century scheme is a £21 million package of traffic management, smarter choices, bus, walking and cycling improvements to address the main transport issues facing Ipswich over the next period (Suffolk County Council, Local Transport Plan 2011 – 2031).

All housing developments of ten or more dwellings completed in Ipswich during 2010/11 were within 30 minutes travel time by foot and public transport of a GP, primary and secondary school, employment area and major retail centre. However, two developments were not within 30 minutes travel time of a hospital by public transport (Ipswich Borough Council 2010/11 Annual Monitoring Report). In 2013/2014, there were seven applications within 30 minutes travel time of a GP, primary and secondary school, employment area and major retail centre (Ipswich Borough Council, September 2014).

## Data Gaps and Uncertainties

There are no key data gaps or uncertainties for this topic.

## Key Issues and Opportunities

- The Borough is well-connected by transport infrastructure and public transport links, making most areas relatively accessible.
- Opportunities should be sought to reduce dependence on the private car and increase public transport use.
- It will be important to ensure that new development can be easily accessed by public transport.
- The cycling and walking network should be expanded and enhanced.

## 7.14 Economy

The following baseline indicators have been used to characterise economic conditions across the Borough:

- Location of key industries and major employers (Ipswich Borough Council).
- Economic activity rate (ONS – Nomis).
- Employment by sector (Office for National Statistics Local Profiles).
- Employment by occupation (ONS – NOMIS).
- Percentage of resident population claiming Jobseekers' Allowance in 2012 (ONS – Nomis).
- Average weekly pay (2011 State of Ipswich Report, Ipswich Borough Council).
- Employment land availability (Employment Land Availability 2012 Report).
- Planning permissions for employment sites (Employment Land Availability 2012 Report).
- Vacant retail units (Ipswich Local Plan Supplementary Planning Guidance District and Local Shopping Centres 2012)

Ipswich is a historic county town of Suffolk and a major centre of population, economic activity and growth in the Eastern Region. Ipswich has one of the strongest finance and insurance sectors in the country. Willis, AXA and RBS all have a presence within Ipswich. The economic structure of Ipswich predominantly comprises tertiary sector activities which encompass more than 80% of the total employment. There is a strong reliance on public sector employment, including two councils, a hospital trust and University Campus Suffolk (UCS). Key local economic sectors identified are:

- Port and logistics;
- Financial services;
- Education and applied research;
- Culture;
- Health and Social Work;
- Construction;
- Distribution and Hotels; and
- Public Sector.

Table B-9 below compares employment by sector in Ipswich, Suffolk and the East of England.

**Table B-9 Employment by Sector %**

Industry	Ipswich	Suffolk	East
Agriculture	0.38	1.84	1.06
Accommodation and Food Service activities	5.61	5.35	4.70
Human Health and Social Work	13.75	12.17	11.49
Manufacturing	7.92	9.84	8.70

Construction	8.05	8.36	8.61
Distribution	17.65	16.05	16.38
Transport and Storage	7.51	6.00	5.29
Finance & Insurance	6.11	3.55	5.01
Information and Communication	4.08	3.19	3.90
Public admin and Education	18.37	19.45	20.38
Professional, Scientific and Technical Activities	3.74	5.21	6.76
Other services	6.83	9	7.71

Source: ONS April 2011 – March 2012 data

Despite the economic downturn the Borough's economy continues to perform well when compared to other districts across the East of England. This is in part due to the high concentration of public sector employment within the Borough, with approximately 27.6% of people employed in the public sector in 2012 compared to only 18.4% and 19.3% in the East of England and England, respectively (ONS Employment Local Profiles).

Ipswich has a large working age (16-64\_ population 65.7% (87,566) compared with the rest of Suffolk, 61%. Around 5,500 (5.7%) of residents have never worked or are long-term employed. The economic activity rate measures the proportion of the adult population in paid employment, unemployed actively seeking employment or who are full-time students. The figure of economically active people in employment for Ipswich was 72.9% between April 2013 - March 2014, slightly lower than for the East of England (75.5%) and higher than that for Great Britain (71.7%). In August 2014 2.7% of the resident population were claiming Jobseekers Allowance, compared to 1.7% in the East and 2.3% across England (NOMIS<sup>20</sup>).

A lower than average proportion of Ipswich's population are classified as managers or senior officials (Ipswich – 5.5%, East 11.0%, Great Britain 10.2%), 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. This data is presented in Table B-10.

**Table B-10 Employment by Occupation (April 2013 – March 2014)**

Employment	Ipswich (%)	East of England (%)	Great Britain (%)
Managers, directors and senior officials	5.5	11.1	10.2
Professional occupations	16.9	19.6	19.9
Associate professional and technical	10.6	14.8	14.1
Administrative and secretarial	11.3	11.2	10.7

<sup>20</sup> <https://www.nomisweb.co.uk/reports/lmp/la/1946157241/report.aspx#tabempunemp>



Employment	Ipswich (%)	East of England (%)	Great Britain (%)
Skilled trades occupations	6.5	10.8	10.5
Caring, leisure and Other Service occupations	9.5	9.1	9.1
Sales and customer service occupations	12.4	6.9	7.9
Process plant and machine operatives	8.9	6.3	6.2
Elementary occupations	16.2	9.6	10.7

Source: NOMIS

On average, the gross weekly pay for employees in Ipswich is £445.5 (2012), which is lower than the East of England average (£531.0) and lower than the national average (£508.0). Part of the reason for this is because the gross weekly pay for female workers at £380.5 is significantly (27.1%) behind that for males in Ipswich (£522.3) and the national average for females (£449.6) (NOMIS 2012).

The total amount of employment land available has decreased by 4.03 hectares (ha) to 71.74 ha across the whole of Ipswich at April 2012 due to the implementation or expiry of planning permissions. The total consists of 0.63ha with unimplemented planning permission, 18.73ha on allocated land and 52.38ha of vacant land within identified employment areas. Completions on allocated and existing employment sites for the current monitoring year has been recorded as zero hectares (Employment Land Availability 2012 Report).

Planning consents for employment sites (over 100 sqm) for the year 2011-12 amount to 15.07ha, of which 14.44ha are extensions or new buildings within existing employment areas, and 12.57ha are outline planning permissions (largely accounted for by the outline planning permission for employment uses at the former Crane's factory site).

According to the SPG District and Local Shopping Centres 2012 there are 46 vacant retail units in the Borough.

## Data Gaps and Uncertainties

- Commercial / retail rental data.
- Business start-ups and closures.
- No. of business enquiries to Ipswich Borough Council / Suffolk County Council by types and size of site.

## 7.15 Deprivation and Living Environment

The following baseline data has been identified:

- Number of wards with LSOAs in the bottom 10% most deprived within the Index of Multiple Deprivation (2011 State of Ipswich Report, Ipswich Borough Council).
- Number of domestic noise and light complaints

Deprivation is a multi-faceted and complex problem which influences and is influenced by a wide range of factors. In general, between 2007-2010, all Local Authorities in Suffolk became relatively more deprived (NB data does not include the effects of the credit crunch and recession). According to the Index of Multiple Deprivation (2010) 26.6% (35,000) of the town's

population lives within the most deprived fifth of areas in England. Ipswich remains the most deprived Local Authority in Suffolk being ranked 87/326 in England (Waveney 112/326; The number of people living within the most deprived 20% of areas has risen by 2.5% (3,200) suggesting that Ipswich has become comparatively more deprived since 2007. Mid Suffolk 274/326), and all of the areas ranked in the bottom 20% of Suffolk are found in either Ipswich or Lowestoft. All of the Suffolk lower super output areas (LSOAs) ranked in the worst 10% of England in 2010 (14) are in Ipswich (9) 64% and Lowestoft (5) 36%. The Bridge Ward had the only LSOA to have moved out of the worst 10% ranking, but LSOAs in Whitton and Stoke Park dropped in rank sufficiently to fall into this group.

During the period April 2012 – March 2013 Ipswich Borough Council served Noise Abatement Notices on 43 premises. During the same period of time there were no abatement notices for light nuisance served.

## Data Gaps and Uncertainties

- Provision of childcare.

## 7.16 Housing

The following baseline indicators have been used to characterise the status of housing across the Borough:

- Average house price (Suffolk Observatory).
- Ratio of relative housing affordability (Office for National Statistics Local Profiles).
- Number of vacant dwellings (Office for National Statistics Local Profiles).
- Dwelling Stock by Tenure (Office for National Statistics Local Profiles and 2011 State of Ipswich Report, Ipswich Borough Council).
- Number of affordable housing completions (Office for National Statistics Local Profiles).
- Number of Homeless presentations (2011 State of Ipswich Report, Ipswich Borough Council).
- Number of dwellings (2011 State of Ipswich Report, Ipswich Borough Council and Ipswich Local Plan Authority Monitoring Report 9, 2012-2013)

Since 2001, the number of dwellings in Ipswich has increased by 11.9%. The total housing stock rose from 57,914 at 1st Apr 2009 to 58,303 at 31st Mar 2010. In 2009 the composition of housing was 14.2% (8210 dwellings) Local Authority stock, 7.8% (4510 dwellings) Registered Social Landlord stock, and 77.8% (44982 dwellings) private housing stock (2011 State of Ipswich Report, Ipswich Borough Council). However housing completions between 2012-13 were the lowest since 1998-99, with just 96 new homes completed – 604 short of the areas National Planning Policy Framework (NPPF) requirement (Ipswich Local Plan Authority Monitoring Report 9, 2012-2013)

The total housing stock in Ipswich rose from 58,303 at the beginning of the 2010 monitoring period to 58,640. Council Tax records show total housing stock as 58,882 rising from 58,441 – Council Tax records include student accommodation.

Housing costs are relatively low but have gradually increased in recent years. The Median house price (July 2013) in Ipswich was £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 in August 2013 (ONS).

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).

In Ipswich, the number of affordable homes provided in 2013/14 was 44. In 2010/11 the number was 150 and over the period since 2006/07 the maximum number of affordable homes was 500 in any year (Office for National Statistics Local Profiles). 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 homeless people has been increasing since 2010. During 2012/13, 617 people were identified as homeless in Suffolk according to the statutory criteria compared to 368 in 2010/2011 and 500 in 2011/2012 (Suffolk Observatory).

At November 2014 there were 972 vacant dwellings (Ipswich Borough Council, November, 2014). This shows a decrease from 2011 when there were 1,909 vacant dwellings and from 2012 when there were 1,750. Of the 972 vacant homes 306 were long term vacant properties (i.e. over 6 months). It is not stated as to what types of dwellings are vacant i.e. there could be a low demand for large expensive homes yet a high demand for affordable homes.

At 1st April 2013, Local Authority dwelling stock was 8,110; Private Registered Provider dwelling stock was 4,770; Other Public Sector dwelling stock was 160 and Private sector dwelling stock was 46,650 this totalled 59,690 (Ipswich Borough Council, September 2014).

Table B-11 presents details of the tenure of housing stock across the Borough in 2011, highlighting that owner occupation in the Borough is lower national and regional averages.

**Table B-11 Dwelling Stock by Tenure (2011)**

	Local Authority Dwelling Stock (%)	Registered Social Landlord Dwelling Stock (%)	Shared Ownership (%)	Owner Occupied and Private Rented Dwelling Stock (%)
Ipswich	14.20	7.39	0.64	78.0
East of England	7.80	7.90	0.73	83.9
England	9.43	8.27	0.79	82.0

Source: Census 2011, ONS

Ipswich Borough Council's Strategic Housing Market Assessment (2008) reported the following conclusions:

- The current gross housing need is calculated to be 3,723;
- The annual future need is calculated to be 2,665 (per annum);
- The total affordable housing stock available is calculated to be 1,563; and
- The future annual supply of affordable housing units is calculated to be 1,520.

The Strategic Housing Market Assessment found a substantial need for smaller 1-2 bedroomed homes in Ipswich to meet the needs of smaller households and an ageing population, as well as a continued need for smaller 2-3 bedroomed family homes. They also reported that some local Black, Asian and Minority Ethnic households require larger affordable homes, so there is also a

continuing need for a small number of larger 4+ bedroomed homes. Much of recent housing development in Ipswich, however, has been in the form of 1 and 2 bedroomed apartments and in the present economic climate there is an oversupply of flats.

The Ipswich Housing Needs Study 2005 looked at housing needs across the Borough. It has been partly updated through the Strategic Housing Market Assessment in 2008. Combined findings of the two studies indicate that:

- Around 66% of households are owner occupiers, 22% live in the social rented sector and 12% in the private rented sector;
- One quarter of households consist of older persons only, and such households account for 37% of all Council accommodation;
- Around 12% of the net affordable housing requirement comes from key worker households;
- Nearly 2% of households live in overcrowded homes, whilst 34% under occupy their dwelling;
- When householders were asked in 2005, around two thirds of their previous house moves had been within the Borough;
- Ipswich has lower than average property prices;
- The need is most acute for small properties, notably two bedroom homes, and is geographically widespread; and
- 80% of any affordable target should be social rented housing (Ipswich Borough Council, Adopted Core Strategy (2011)).

In 2012 the Strategic Housing Market Assessment (SHMA) was further updated to reflect the economic and political change that has occurred since the SHMA was published in 2008. The findings of the study indicate that:

- On average, incomes in the Ipswich Housing Market Area (HMA) remain below both regional and national levels. Earnings in Ipswich are well below those in the rest of the HMA. This update estimates that 41% of newly forming households are not able to afford to rent or buy a home within the Ipswich HMA.
- Worsening affordability of housing reduces the rate that young adults form households. One effect has been for more young people to live with their parents. Nationally, around one in three men and one in six women aged 20 to 34 now live with their parents, an increase from one in four men and one in seven women in 1997.
- A lack of choice of housing affects mobility within the labour-market and, therefore, the economy. There are also local spatial implications for the Ipswich HMA if this trend continues such as:
  - an even greater need for affordable housing in the least affordable areas;
  - greater household formation in more affordable areas such as Ipswich, increasing the birth-rate which increases demand for schools for example; and
  - further commuting from more affordable to less affordable areas.
- One consequence of an aging population is a reduced average household size as fewer households contain children and more single households are present.
- Currently, there is a backlog of over 4,000 households in need of a suitable and affordable home in the Ipswich HMA. The supply of new affordable homes and the reuse of existing stock are not sufficient. In order to address this shortfall, 70% of all new homes in the Ipswich HMA currently being planned would need to be affordable.

- With more older people being assisted to remain at home, the trend for larger homes to be under-occupied is likely to increase. This could have a knock-on effect of constraining the supply of homes. At the same time, older people will expect more choice on the type, quality and location of accommodation.

## Data Gaps and Uncertainties

- Percentage of new dwellings meeting BREEAM/Code for Sustainable Homes Level 4 standards.

## 7.17 Transboundary Issues

For many authorities, the geographical scale of particular baseline issues means that they relate closely to neighbouring authorities. For example, housing provision and prices, employment migration and commuting, service provision and education can all result in flows of people across Local Authority boundaries. In order to help to characterise the baseline further, some of these key 'transboundary' issues have been identified below.

- Waste disposal is a significant issue for Ipswich with the adopted Suffolk Core Strategy identifying a deficit of waste facilities for the future.
- Ipswich may encounter a shortage of affordable dwellings in the future, which may lead to people relocating to cheaper parts of the East of England.
- Cumulative impacts regarding major roads should be considered.

## Appendix C

---

# Consultation Comments

## Comments on Core Strategy Interim Sustainability Appraisal Report (December 2013)

Summary of Response	Respondent	Council's comments	Action required
Largely in agreement with the findings of the sustainability appraisal report and have no specific or general comments to make.	Environment Agency	Noted	None
The National Planning Policy Framework states that broad locations can be identified for development late in the plan period, but the broad location of 'Ipswich Policy Area' (IPA) provides no clarity as to the proportion of dwellings expected to be provided in each neighbouring authority. The sustainability appraisal (SA) does not provide any assessment of broad locations or cumulative effects on areas with known constraints. In light of the limited land available in Ipswich the SA should consider all reasonable alternatives e.g. increasing densities, and consider the plans already adopted by neighbouring authorities and developments in the IPA already established in principle.	Suffolk Coastal District Council	It is agreed that the Sustainability Appraisal should consider the potential effects of the longer term policy of working with neighbouring authorities however at this stage it is not possible/appropriate to identify broad locations outside Ipswich Borough as the plan relates to Ipswich Borough only. Whilst higher densities are understood to be unviable at this point in time, there may be scope to develop higher density development in the Borough in the future and therefore this could be considered as a strategic alternative. Developments occurring/allocated in the IPA area outside Ipswich at the moment could not be counted against both the Ipswich housing need and the housing need of neighbouring authorities.	The Sustainability Appraisal has been revisited in order to consider the effects of working with neighbouring authorities to meet housing need later in the plan period and to consider the strategic alternative of higher density development within Ipswich.
Would advise that reference is made to the requirement for a Habitats Regulation Assessment to assess proposals on Ramsar sites. The SA should adopt a topic based approach in assessing the effects of the plan on the environment and locally designated sites such as County Wildlife Sites. Connections between topics should be considered. The report should reference Suffolk Biodiversity Action Plan, local Green Infrastructure Plan, Natural England's	Private individual	It is agreed that the requirements for HRA should be within the policies. It is also agreed that further detail should be included in DM31 in relation to the categories of designated sites.	Policy DM31 has been amended to refer to the requirements of the Habitats Directive and to contain specific policy for different designated sites.

Summary of Response	Respondent	Council's comments	Action required
'standards for accessible natural greenspace' (ANGst), and Analysis of Accessible Natural Greenspace Provision for Suffolk, the local Water Cycle Study and Sustainable Drainage Systems (SuDS).			
Additional text on open spaces, green infrastructure, improved ecological networks and tree canopy cover are supported (Para. 4.2.1).	Northern Fringe Protection Group	Noted	None
SA fails to see the implications of changes to the Core Strategy; the removal of any Previously Developed Land target is a major change. Development of the greenfield Garden Suburb will reduce development of brownfield sites which should be a priority. A suburb creates more traffic than sites near to existing employment and will therefore impact upon environmental objectives. A specific target for jobs in Ipswich not the Policy Area is also required in order to have any meaning. The implications in switching from a jobs led to a housing led strategy are huge and must be assessed.	Northern Fringe Protection Group	Appendix C of the Strategic Environmental Assessment and Sustainability Appraisal of the Focused Review of the Core Strategy and Policies Development Plan Document (Hyder, December 2013) outlines the implications of the change to the Policy CS9.  Policy CS13 relates to the creation of in the region of 12,500 jobs in Ipswich Borough.  The 2013 Sustainability Appraisal (reference above) has considered the changes between adopted CS13 and the proposed revisions to CS13.	None
The Sustainability Appraisal / Strategic Environmental Assessment process requires an examination of the baseline information of the Borough as it is now together with data on how it may change in the future. The Core Strategy and SA must therefore be based on the best data available, which is not the case as it fails to utilise the most recent DCLG or East of England Forecasting Model 2013 forecasts.	Northern Fringe Protection Group	The SA baseline, set out in the Scoping Report, identifies the current situation whereas the East of England Forecasting projects future jobs growth which has informed policy CS13. The assessment of adopted policies represents the assessment of likely direction of change without the review of the plan (i.e. the 'no plan' alternative), as detailed in Section 3 and Appendix	None



Summary of Response	Respondent	Council's comments	Action required
		E of the 2013 Interim SA Report.	
SA must take account of new governmental guidance on the National Planning Policy Framework issued following the Ministerial Statement of 6 <sup>th</sup> March 2014. Changes include: issuing guidance on flood risk; clarifying that local plans can be sound where authorities cannot identify housing land for years 11-15; allowing windfalls to be counted over the whole plan period and student/older persons' housing and the reuse of empty homes to be included when assessing housing need; ensuring that infrastructure is provided to support new development; stressing the re-use of brownfield land; and clarifying the issue of prematurity in relation to draft plans.	Northern Fringe Protection Group	The review of plans and programmes relates to adopted policy. The National Planning Policy Guidance contains details relating to the implementation of the National Planning Policy Framework, the policies of which are referred to in the Scoping Report, and it is therefore not necessary to specifically refer to this. The National Planning Policy Guidance has however been considered when revising the two DPDs.	None
Sections 2.3.9 and 2.3.12 fail to identify from the 2013 Suffolk Growth Strategy (sections 2.26, 4.2, 4.4 & 4.5 refer) the need to 'transform skills from a growth barrier to a growth stimulus' and 'Boost educational attainment, aspiration and employability'.	Northern Fringe Protection Group	The Suffolk Growth Strategy is identified in the Review of Plans, Policies and Programmes in the Scoping Report (2013). It is not necessary to refer to every relevant Plan within this section of the Sustainability Report which essentially summarises the process undertaken in the Scoping Report.	None
Table 2.2: omissions in the summary of sustainability issues and opportunities that need to be corrected, especially in relation to the use of obsolete data. E.g. needs to better represent low education standards in Ipswich; use better health data; address wastewater issues; acknowledge that air quality is worsening in	Northern Fringe Protection Group	The baseline issues refer to current issues and not those that may arise from policies contained within the plan which are identified through the assessment itself (see chapters 3 and 4). Further assessment of air quality effects arising from development at the Northern Fringe will be	Anglian Water's Water Resources Management Plan 2015 (published 2014) has been referred to in the PPP review of the SA Report.

Summary of Response	Respondent	Council's comments	Action required
Ipswich and factor in the effect of traffic from the Northern Fringe; acknowledge that Ipswich is not well connected; use better data on pay/benefits; address worsening deprivation; and include empty homes and stock condition data.		addressed. It is not clear what 'better data' is available. Table 2.2 identifies that educational attainment is low and identifies issues around Source Protection Zones in relation to water. Deprivation relates to a wide range of topics which have been covered in detail in the Scoping Report and in Table 2.2. Do not agree that Ipswich is not well connected. However the Scoping Report does not identify the water supply issues set out in the recently published Water Resources Management Plan.  Revisions to the baseline identify the possible future revisions to AQMAs.	
Table 2.3: suggest improvements to objectives and indicators, e.g. ET1 should include an indicator to measure congestion as the main cause of air pollution. Consider consequent changes to Table 2.4.	Northern Fringe Protection Group	It is not clear how congestion would be measured. In relation to air quality congestion is an 'output' whereas the indicators proposed would actually measure the 'outcome' and are therefore more meaningful.	None
Para. 2.3.27: there will obviously be an increase of traffic during the construction / operation of new residential developments associated with an increase of inhabitants and their future transport requirements, affecting local air quality and climate change. This paragraph needs to be amended or justification why there might be no increase in traffic.	Northern Fringe Protection Group	It is agreed that there is likely to be an increase in traffic and the paragraph should be reworded in this respect.	This has been picked up in the SA.
Para. 2.3.25: question the 'uncertainties' arguing they are likely outcomes unless further mitigation steps are implemented. The SA underestimates the impact of	Northern Fringe Protection Group	Paragraph 2.3.26 identifies the reasons for uncertainties however the Sustainability Appraisal process identifies mitigation measures to help to	None

Summary of Response	Respondent	Council's comments	Action required
objective ER3 which is incompatible with objectives ET1, ET2, ET3, ET4, ET6, ET7 and ET8.		address these, as set out in Appendices E and F of the Sustainability Appraisal Report.	
Para. 2.3.35: a number of concerns from previous comments on the Scoping Report have not been adequately addressed and need to be revisited as set out below:	Northern Fringe Protection Group	.  See below	See below
<p>Scoping Rpt comment: The NFPG has always supported an employment-led strategy. However, we argued that IBC's Core Strategy (CS) was not sustainable and therefore unsound as it was based on job targets that had no supporting evidence base and were clearly unrealistic and unachievable. The previous SA failed to recognise these legitimate and material concerns and omitted any form of assessment of the implications of the jobs target being unrealistic. Evidence now shows that the jobs target was indeed unsustainable and that the original SA was incorrect in assessing the CS as sustainable. This clearly shows that a more robust and evidence-based approach for the SA is required that better takes account of the views of the general public which have been shown to be informed and accurate.</p> <p>Further comment: Why has Hyder ignored the point we are making in its response? The UK recession started in Q2 2008 and was known at the time of Hyder's SA so it was obvious that delivery was not possible. This does not change the fact that the forecasts were not evidence based and were ludicrously over-optimistic when compared to historic</p>	Northern Fringe Protection Group	As stated in response to the comment on the Scoping Report, the employment targets are based on the East of England Forecasting Model which is widely used. It is unclear from the response what evidence would lead to the SA assessing the policies differently.	None

Summary of Response	Respondent	Council's comments	Action required
trends. Please explain why Hyder failed to identify these obvious data flaws in its original SA?			
<p>Scoping Rpt comment: We are disappointed that IBC has ditched the employment-led strategy despite this being widely supported by officials, councillors, politicians, businesses and the general public in favour of a housing-led approach. This has been done without any assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy and the associated impacts on sustainability. Such an approach is fundamentally flawed.</p> <p>Further comment: The approach is not policy compliant with the NPPF and guidelines as it does not use DCLG 2011 forecasts and is based on an old EEFM 2012 model run rather than EEFM 2013. The revised strategy fails to take account of a large fall in economic migration and a massive drop in net commuting into Ipswich. It proposes an increase in housing that is not supported by a balanced increase in jobs. It does not contain a specific jobs target and over-estimates the growth prospects of the town centre when compared to the Suffolk Growth Strategy and NALEP strategic plan. How does Hyder intend to factor these points in its SA?</p>	Northern Fringe Protection Group	<p>The objectively assessed housing needs arises from the Ipswich Housing Market Area Strategic Housing Market Assessment (SHMA) (August 2012) and Ipswich Housing Market Area population and household projections: an analysis of demographic change (September 2013).</p> <p>The SA objectives are based on an analysis of all relevant plans and programmes including those referred to.</p>	None
Scoping Report comment: The SA needs to consider the implications of this key change in IBC's strategy and in particular consider the implications of new homes being constructed in Ipswich Borough that will	Northern Fringe Protection Group	As stated previously, it does not necessarily follow that a larger workforce would be competing for a smaller number of jobs. Policies would ensure that offices and other town centre uses are focused on	None

Summary of Response	Respondent	Council's comments	Action required
<p>result in either higher unemployment levels in the Borough or new residents having to travel outside the Borough to sites of employment. Previously one of the main arguments that the Northern Fringe housing development is sustainable was that residents will walk/cycle or travel by bus to new jobs created in Ipswich town centre, which will no longer be the case in a housing-led strategy. The SA of the Northern Fringe will also need to be revised to take account of this.</p> <p>Further comments: Why has Hyder chosen to ignore that the net commute into Ipswich is falling from 11.8 (000's 2001) to 1.1 (2012 based on 2011 employee and 2011 resident employment data)? How will Hyder take this into account in its SA?</p> <p>Please explain how Hyder considers the Ipswich – Felixstowe train service as a sustainable travel option when there is evidence that it is clearly failing and as the train station is not located near to the major sites of employment? We are pleased to note that Hyder recommends that improved train services from Westerfield station are required.</p> <p>Currently, the Route 66 service takes 48 minutes from Ipswich train station to Martlesham. For someone travelling from the Northern Fringe it will take between 20-30 minutes to access this service (assuming that the proposed bus route servicing the Northern Fringe arrives at the Cattle Market bus station, which Route 66 serves the station and not Tower Ramparts bus</p>		<p>the town centre (see policy CS14). The Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014) contains specific requirements in relation to public transport and it should therefore not be assumed that only existing patterns of bus provision would be available. It is not the role of the Sustainability Appraisal to identify specific measures to mitigate possible effects but to ensure there are the correct policies in place to secure these measures at the planning application stage which in relation to transport would be through DM17. The SA has been based on the published data available as outlined in the Scoping Report.</p>	

Summary of Response	Respondent	Council's comments	Action required
<p>station). It will therefore take around 75-80 minutes to get from the Northern Fringe by public transport to Martlesham Heath which is less than 7 miles away.</p> <p>Why does Hyder think this will be a sustainable transport route that will be used by residents of the Northern Fringe? This would only work if there was a direct bus route from the Northern Fringe to Adastral Park. We are pleased to note that Hyder recommends that bus services from the Northern Fringe to employment sites are required but Hyder needs to add that these should be direct otherwise few people would use them.</p> <p>Why has Hyder chosen to ignore that IBC's forecasts show that there will be more working age people in the Borough competing for less jobs in its answer?</p> <p>Hyder shows a major lack of understanding of the transport issues facing Ipswich. Please advise how Hyder has attempted to gain first hand experience of these issues and incorporate this knowledge into its SA. Without having this knowledge Hyder's SA risks being unsound. How does Hyder intend to fill this apparent knowledge gap? We would be pleased to meet with Hyder to share our concerns and first hand experience.</p>			
<p>Scoping Report comment: We support Paragraphs 2.20 and 2.21 of the IBC Executive paper REF NO: E/13/60 Northern Fringe - Draft Supplementary Planning Document Ipswich Garden Suburb and Sustainability Appraisal confirming that the Core</p>	<p>Northern Fringe Protection Group</p>	<p>Consideration has been to given to only allocating 1,500 dwellings at the Garden Suburb however this is judged to be unrealistic, see paragraph 3.3.1 of the SA report for the Proposed</p>	<p>No action needed.</p>

Summary of Response	Respondent	Council's comments	Action required
<p>Strategy Focused Review (CSFR) “will look at alternatives to the Northern Fringe allocation itself”. The Scoping study must include details of how this will be carried out. This should include a “mapping” of the proposed sites of major employment and new homes in and around Ipswich and analysis of the potential impact and sustainability of likely travel routes. The process should also include an assessment of whether the proposed numbers of proposed new homes and jobs in the area are feasible and sustainable.</p> <p>Further comments: Why does Hyder not identify that for the Ipswich Housing Market Area it is more sustainable to locate new homes near to the sites of new jobs and that this option is available under the duty to cooperate and should therefore be considered?</p> <p>How will Hyder assess whether the proposed numbers of proposed new homes and jobs in the area are feasible and sustainable? If Hyder simply assumes IBC's figures are correct then its SA risks being unsound.</p>		<p>Submission Core Strategy.</p> <p>It should not be assumed that those occupying new homes would only work in 'new' jobs, the SA must also give consideration to the location of existing jobs.</p> <p>The SA objectives are based on the baseline and review of plans and programmes contained in the Scoping Report.</p>	
<p>Scoping report comments: The full sustainability implications of the change in the focus of the CS on the wider transport network must also be fully assessed in the SA of the CSFR and in considering alternatives to the Northern Fringe allocation itself. Clearly this can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring</p>	<p>Northern Fringe Protection Group</p>	<p>Whilst further reference to possible impacts on AQMAs could be provided, it is not the role of the SA to undertake a full and detailed traffic impact assessment which would be undertaken at planning application stage. The SA does not assume that every resident would travel to new jobs in the town centre, however it considers the location of the Garden Suburb in relation to the</p>	<p>Further consideration has been given to the impact on AQMAs in the assessment of CS10.</p>

Summary of Response	Respondent	Council's comments	Action required
<p>authorities that takes full account of relevant employment sites and proposed new housing developments. This needs to assess the impact on air pollution as traffic from the Northern Fringe will pass through AQMAs and areas of pollution concern as residents travel to work.</p> <p>Further comments: Hyder does not yet fully assess the implications of each policy with regards to travel through ET4 and ET1 as Hyder assumes that new residents will either commute to new jobs in Ipswich town centre rather than the likely sites of new employment or use sustainable transport which is not a viable proposition for residents from most proposed new homes outside the town centre. Hyder also refuses to acknowledge that Air quality is worsening in Ipswich requiring new AQMAs and that residents will want and/or/need to drive through the current and proposed AQMAs. How will Hyder take these points into account to ensure its SA is sound?</p>		<p>town centre where there is a concentration of jobs. It should not be assumed that residents of the new homes would only work in 'new' jobs,</p>	
<p>Scoping Report comments: In particular, the SA of the CSFR needs to consider whether there are alternative brownfield sites outside of the Borough that can accommodate new housing with better access to new sites of employment, such as the Sroughton Sugar Beet site, which would be a more sustainable option than building on the high grade agricultural land of the Northern Fringe with residents commuting through Ipswich to access employment sites. The impact of utilising sites such as Grafton Rd, Cox Lane and Westgate for a larger number of new homes, rather</p>	<p>Northern Fringe Protection Group</p>	<p>Consideration has been to given to only allocating 1,500 dwellings at the Garden Suburb however this is judged to be unrealistic, see paragraph 3.3.1 of the SA report for the Proposed Submission Core Strategy.</p> <p>It should not be assumed that those occupying new homes would only work in 'new' jobs, the SA must also give consideration to the location of existing jobs.</p> <p>The plan allocates land at Westgate and Cox</p>	<p>Consideration has been given to relying on neighbouring authorities and only allocating 1,500 dwellings at the Garden Suburb.</p>



Summary of Response	Respondent	Council's comments	Action required
<p>than leaving them vacant, needs to be appraised.</p> <p>Further comments: Can Hyder explain, its assumption that people living on the Sugar Beet Site would need to travel through Ipswich to access employment sites? It is far more likely the majority would take advantage of the excellent access to the A14 and onwards. Of course there are existing employment sites nearby plus new ones that could be developed on the Sugar Beet site as a shared residential/employment site as well? IBC's housing growth target of at least 13,550 homes is unachievable within the Borough and relies on windfall sites and neighbouring Local Authorities to make up the shortfall of 4,611 dwellings 11</p> <p>(Paragraph 8.83 of the Core Strategy). So such sites as the Sugar Beet factory must be considered to help IBC deliver its targets. Hyder's comment that it cannot as IBC has no control over it implies that the CS is unsound as IBC has no control over delivering its housing target. Can Hyder confirm this or whether it will be assessing such options which are possible under the duty to cooperate? Suffolk Coastal is planning on building new homes to match new jobs created at Adastral yet Hyder in its previous response believes it is acceptable for IBC to also build new homes in the Borough for people to commute to Adastral. Hyder needs to be consistent in its process and appraisal.</p>		<p>Lane for a mix of uses including residential. The site at Grafton Way is now proposed for housing allocation should the extant permission for a mix of uses not be implemented.</p> <p>It is reasonable to assume that, should the sugar beet factory site be developed for housing, then a proportion of residents would travel into Ipswich for employment. CS7 identifies a need to work with adjoining authorities later in the plan period to meet the residual housing need however this plan cannot itself allocate land within another authority's area. Mechanisms are in place for this joint work to take place as detailed in the Duty to Cooperate statement.</p>	
<p>Scoping Report comments: The current CS allows for a phased approach for the development of the</p>	<p>Northern Fringe Protection</p>	<p>The SA has considered the allocation as proposed in the level of detail which is</p>	<p>None</p>

Summary of Response	Respondent	Council's comments	Action required
<p>Northern Fringe and the previous Suffolk County Council Northern Fringe Sustainability Appraisal and the Core Strategy independent Inspection judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the entire Northern Fringe without any locational restrictions. A detailed examination of the implications of this change must be included in the new SA along with a full assessment of the rationale behind the proposed changes. This should include analysis of the comparative risks of unfinished sites and/or stalled developments being left on the Northern Fringe for whatever reason. This is already a major problem for Ipswich in relation to the waterfront developments, as a result of the unsustainable multi-starts that were allowed to commence and become a major blight on Ipswich.</p> <p>Further comments: Hyder's appraisal of revised policy CS10 does not fully consider the implications of multiple starts compared to the original CS10 as we detail in our response to the CS and Northern Fringe SPD consultations. As a minimum the proposals contained in the Northern Fringe SPD must be reflected in the CS and there should be further restrictions to avoid stalled developments and to ensure the required infrastructure delivery relative to the number of homes, especially in relation to the first primary school. Will Hyder reappraise this in light of our comments?</p>	Group	<p>proportionate to the purpose of the SA.</p> <p>A separate SA was undertaken on the SPD and the SPD is identified as mitigation in a number of respects however it would not be appropriate or necessary for CS10 to reiterate the guidance contained in the SPD.</p>	
Scoping Report comments: Paragraph 3.2.1 needs to	Northern Fringe	Consideration has been to given to only allocating	Consideration has been

Summary of Response	Respondent	Council's comments	Action required
<p>reference the proposal for the Core Strategy to no longer be jobs-led but a housing-led strategy. The SA must compare and assess the relative benefits of these alternative strategic approaches and alternatives to the Northern Fringe allocation itself as committed to by IBC in the recently approved Executive paper REF NO: E/13/60.</p> <p>The paragraph still needs to reference this fundamental change though. Why is Hyder not recommending that IBC uses the DCLG 2011 forecasts to assess housing need as referenced in the NPPF guidance and the most recent EEFM forecasts? These are obviously required for an up to date assessment otherwise the CS risks being unsound.</p> <p>Further comments: Hyder states that for “employment local and regional strategies aim to play to the area's sectoral strengths.” Why has Hyder not identified that Ipswich town centre has not been identified as a major centre for new jobs in the Suffolk Growth Strategy or the NALEP Strategic Plan and that there is a mismatch between their employment growth sectors and those identified for Ipswich?</p>	Protection Group	<p>1,500 dwellings at the Garden Suburb however this is judged to be unrealistic, see paragraph 3.3.1 of the SA report for the Proposed Submission Core Strategy.</p> <p>Paragraph 8.137 of the Core Strategy identifies the sectors identified for growth in the NALEP.</p>	given to relying on neighbouring authorities and only allocating 1,500 dwellings at the Garden Suburb.
Scoping Report comments: Paragraphs 3.3.2 and 3.3.11 and Table 3-1 need to specifically reference the CSs of neighbouring authorities and the critical work of the Ipswich Policy Area Board given the duty to cooperate and the proposed approach to build homes in Ipswich Borough for people working outside the Borough. These are more important than the New	Northern Fringe Protection Group	The review of plans and programmes (see Appendix A of Proposed Submission Core Strategy SA report) includes the NALEP plan and the Suffolk Growth Strategy. Table 3-1 is informed by these. The review of plans and programmes has also considered the adopted plans of adjoining planning authorities. The work of the	None

Summary of Response	Respondent	Council's comments	Action required
<p>Anglia Local Enterprise Partnership 'Towards a Growth Plan' 2013, which is more of a wish list than an evidence-based document. The quoted growth forecasts are out of date.</p> <p>Further comments: Will Hyder include in Table 3-1 the Ipswich Policy Area Board's work, provide updated forecasts and include the recently released NALEP Strategic Plan which has more substance as these are all more relevant. If not, please explain why.</p>		<p>Ipswich Policy Area Board is committed to through policy CS6 which has been subject to SA but, as a mechanism for joint working, it is not clear how this would be relevant to Table 3-1.</p>	
<p>Scoping report comments: Table 3-1 should refer to Ipswich Borough-specific data rather than quoting East of England data and should reference the most recent data e.g. the EEFM August 2013 modelling. This projects a lower level of jobs than previously.</p> <p>2011 2031 Increase</p> <p>Population 133.7k 163.4k 29.7k (22.21%)</p> <p>Resident jobs 63.2k 71.4k 8.2k (12.97%)</p> <p>This means that additional residents will either have to commute outside of Ipswich Borough to find work or will be unemployed; neither of which is sustainable.</p> <p>Further comments: We are pleased that Hyder will take into account Aug 2013 modelling results but note that it has not yet done so. Hyder should therefore insist that IBC uses most recent data in its analysis otherwise the CS will be unsound. Please confirm this will be the case. If not please explain why Hyder</p>	<p>Northern Fringe Protection Group</p>	<p>The review of plans and programmes has been updated to include reference to the up to date forecasts available at the time of writing. The 2013 forecasts were not significantly different to the 2012 forecasts.</p>	<p>None</p>

Summary of Response	Respondent	Council's comments	Action required
believe it is acceptable to use out of date data.			
<p>Scoping Report comment: Paragraph 3.4.1.3 Ipswich Central's vision for Ipswich needs to be considered <a href="http://ipswichcentral.com/thebigdebate/">http://ipswichcentral.com/thebigdebate/</a> along with the work of the Ipswich Policy Area Board especially in relation to employment and the 2012 Air Quality Updating and Screening Assessment for Ipswich Borough Council (January 2013), which concludes that "St Matthews Street and Woodbridge Road are both areas where NO2 results were high. These areas have therefore undergone a detailed assessment and as a result AQMA's will be declared. "</p> <p>Please confirm that Ipswich Central's vision for Ipswich will be considered by Hyder in the SA. If not, please explain why?</p> <p>Further comments: Please confirm that the impact of the revised CS on the additional AQMAs will be considered in Hyder's SA. If not, please explain why? The approximate sites of the AQMAs are known so there is no reason why they should not be considered.</p>	Northern Fringe Protection Group	<p>The vision for Ipswich Central can be included in the review of plans and programmed.</p> <p>The potential impact on AQMAs has been considered in relation to policy CS10.</p>	This has been included within the review of plans and programmes,
Table 3-2 needs to reference the proposed new AQMAs (as does Appendix B.7) as referenced above and utilise more recent data where available. There are also opportunities to improve cross-town transport infrastructure and access to the A14/A12. This will become a fundamental requirement if the CS is changed to housing-led as residents will need to be able to easily commute to employment sites outside	Northern Fringe Protection Group	<p>The baseline (Appendix B of the Proposed Submission Core Strategy SA report) has been updated to reflect the current situation surrounding AQMAs.</p> <p>Mitigation measures have been identified in relation to transport where necessary throughout the assessment.</p>	None

Summary of Response	Respondent	Council's comments	Action required
<p>the Borough.</p> <p>The fact that new AQMAs are proposed still needs to be referenced here. Please explain why Hyder continues to ignore this worsening environmental issue in its report.</p> <p>Please confirm that Hyder's SA will consider the additional cross-town transport infrastructure and improved access to the A14/A12 that will be required to mitigate the impact of the change in strategy to a housing led one? If not, please explain why?</p>			
<p>Scoping Report comments: Paragraph 4.1 As the CSFR proposes to a housing-led strategy with residents commuting to jobs outside of Ipswich Borough, the SA clearly needs to undertake a full and detailed assessment of the associated travel implications outside of Ipswich Borough.</p> <p>Further comments: As mentioned earlier, the EEFM 2013 shows that the net commute into Ipswich is falling from 11.8 (000's 2001) to 1.1 (2012 based on 2011 employee and 2011 resident employment data)? With the proposed shift to a housing-led strategy and lack of new jobs being created in the town centre, residents will have to increasingly commute to jobs outside Ipswich Borough. This is obviously a major sustainability issue that must be considered fully in the SA. How will Hyder take this into account in its SA?</p>	Northern Fringe Protection Group	The SA has considered the relationship between new housing in terms of both the location of new jobs and the location of existing ones, through SA objective ET4.	None
Need to make clear that the proposed CSFR is no longer a jobs-led strategy but a housing-led strategy.	Northern Fringe Protection	The geographical scope of the SA which has not changed. The SA assesses the policies as they	None

Summary of Response	Respondent	Council's comments	Action required
<p>To fail to mention this fundamental change is misleading and lacks transparency. Likewise the major proposed changes to CS10 need to be outlined here i.e. the intention to allow simultaneous multiple starts across all three areas of the NF without restricting the number of construction sites at any one time etc and prior to the agreement of a Masterplan also needs to be specifically mentioned.</p> <p>As these are major changes they should still be referenced here. If not, why not?</p>	Group	are presented in the Proposed Submission Core Strategy. Section 4.3 of the SA report of the Proposed Submission Core Strategy identifies the main changes since the earlier draft.	
<p>Scoping Report comments: Paragraph 4.2.2.1 As stated above, the SA of the CSFR needs to assess the alternative of an evidenced-based jobs-led strategy. It also needs to assess the alternative of a phased and controlled development of the Northern Fringe that does not allow multi-site starts or places restrictions on when the three areas of the NF can be developed and/or on the number of sites that can be developed in any one area at the same time.</p> <p>Hyder's SA does not assess the alternative of an evidence based jobs-led strategy. It does not take into account;</p> <ul style="list-style-type: none"> <li>o most recent EEFM forecasts,</li> <li>o major net-commuting changes,</li> <li>o the Ipswich SHMA uses obsolete DCLG and not more recent 2011 data,</li> </ul>	Northern Fringe Protection Group	The National Planning Policy Framework requires planning authorities to plan to meet their objectively assessed housing need and the consideration of alternatives in relation to this have been set out in section 3.3 of the SA of the Proposed Submission Core Strategy. The retail proposed for the town centre is based upon the DTZ 2013 Town Centre Opportunity Areas report. The Suffolk Growth Strategy and the NALEP Plan are included within the baseline which has informed the sustainability objectives. The 2013 EEFM data was not available to inform previous drafts and it is considered that the difference between this and the 2012 data is not significant.	

Summary of Response	Respondent	Council's comments	Action required
<ul style="list-style-type: none"> <li>o recent local economic migration figures,</li> <li>o that Ipswich town centre is not identified as a major growth centre in either the Suffolk Growth Strategy or NALEP Strategic Plan,</li> <li>o an over-reliance of IBC on major retail development in the town centre.</li> </ul> <p>Further comments: Please explain how Hyder intends to incorporate these key issues into its analysis.</p>			
<p>Para. 2.4.4: removal of a Previously Developed Land target from policy CS9 is a major change and therefore needs to be part of the SA.</p>	Northern Fringe Protection Group	Appendix C of the Strategic Environmental Assessment and Sustainability Appraisal of the Focused Review of the Core Strategy and Policies Development Plan Document (Hyder, December 2013) outlines the implications of the change to the Policy CS9.	None
<p>Para. 3.1.1: the original SA was flawed because it did not look at alternatives to the policies other than 'do nothing'. The SA of the Core Strategy review must assess alternatives.</p>	Northern Fringe Protection Group	Whilst alternatives in Ipswich are limited, it is agreed that whilst higher density development may not be a viable alternative at this point in time it may be in the future and this will be considered as an alternative.	The SA has considered higher densities in Ipswich Borough as a strategic alternative to addressing housing need through working with neighbouring authorities.
<p>Table 3.1: should assess changes to policy CS9. Policy CS7 – the most recent data should be used, and reliance on windfalls and neighbouring authorities noted. Policy CS10 – the negative impacts on brownfield development should be considered and wording on phasing looked at. Policy CS13 – should</p>	Northern Fringe Protection Group	Appendix C of the Strategic Environmental Assessment and Sustainability Appraisal of the Focused Review of the Core Strategy and Policies Development Plan Document (Hyder, December 2013) outlines the implications of the change to	The Sustainability Appraisal has been revisited in order to consider the effects of working with neighbouring authorities to meet housing need later in the plan period



Summary of Response	Respondent	Council's comments	Action required
<p>require that the latest East of England Forecasting Model (EEFM) 2013 data are used, and assess growth areas relative to the EEFM / New Anglia Local Enterprise Partnership Strategic Economic Plan / Suffolk Growth Strategy. Policy CS14 should take better account of Ipswich Central's views on the retail sector. Policy CS17 should check for and eliminate unintended consequences.</p>		<p>the Policy CS9.</p> <p>It is agreed that the Sustainability Appraisal should consider the potential effects of the longer term policy of working with neighbouring authorities.</p> <p>The Ipswich Garden Suburb is proposed to come forward alongside the land allocated for brownfield development within Ipswich and therefore it is not appropriate for the SA to assess any implications of brownfield land not coming forward.</p> <p>Policy CS13 is based upon the most up to date EEFM data available.</p> <p>Without clarity over specifically which of Ipswich Central's views are considered to be not represented, it is considered that the policy is consistent with the aims of Ipswich Central and the supporting text includes reference to working with Ipswich Central.</p> <p>It is not clear what unintended consequences are being referred to however the policy contains flexibility relating to the viability of individual developments.</p>	<p>and to consider the strategic alternative of higher density development within Ipswich.</p>
<p>Table 4.1: the wider implications of the change to policy CS9 [brownfield target] needs to be considered alongside the options for keeping a target at a reduced level.</p>	<p>Northern Fringe Protection Group</p>	<p>Appendix C of the Strategic Environmental Assessment and Sustainability Appraisal of the Focused Review of the Core Strategy and Policies Development Plan Document (Hyder, December 2013) outlines the implications of the change to</p>	<p>None</p>

Summary of Response	Respondent	Council's comments	Action required
		the Policy CS9.	
Para. 4.3.4: the SA needs to recognise that the Core Strategy needs to be better balanced to improve the lives of existing residents through redeveloping poor housing stock, tackling deprivation, reducing crime, improving health, getting people off benefits and back to work. The SA focuses too much on the advantages of new homes to the new residents and the averaging effect of these developments across Ipswich rather than on existing residents in existing wards who will remain disadvantaged and in need.	Northern Fringe Protection Group	These are planning documents and therefore have limited influence over existing dwelling stock. Policies which promote new employment opportunities relate as much to existing residents as to new residents.	None
Para. 4.3.5: the policies do not consider the likely location of new homes to new employment sites, or that new residents in Ipswich Borough will have to commute outside of the Borough to new sites of employment. The policies do not consider the implication of having insufficient jobs to match the number of new residents looking for employment.	Northern Fringe Protection Group	Policy CS13 plans to provide sufficient employment development to provide for the jobs forecast. It should not be assumed that those living in new homes will only be employed in 'new' jobs.	None
Para. 4.3.7: pleased the SA recognises the travel implications in relation to housing development of the Northern Fringe. However, this needs to be better reflected throughout its assessments.	Northern Fringe Protection Group	Further consideration is being given to assessing traffic (air quality) implications of the Garden Suburb development. However, transport impacts and mitigation measures would need to be considered in detail as part of the planning applications, as identified in the Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014).	Further consideration to air quality / transport has been given through the Sustainability Appraisal process.
Para. 4.3.10: following recommendations are required: most recent population and employment data should	Northern Fringe Protection	Policy CS13 plans to provide sufficient employment development to provide for the jobs	None

Summary of Response	Respondent	Council's comments	Action required
<p>be used and forecasts should be made across district boundaries; a firm jobs growth target will help focus delivery; a better balance between new jobs and homes is needed with homes built near jobs; less reliance on retail growth and better alignment with New Anglia Local Enterprise Partnership growth sectors; a Previously Developed Land target should be reintroduced; policy CS10 and Table 8B should be revised to remove risk of unintended consequences; water supply and sewerage should be addressed; and more should be done to improve the lives of existing residents.</p>	<p>Group</p>	<p>forecast. It should not be assumed that those living in new homes will only be employed in 'new' jobs.</p> <p>Retail growth is based upon the recommendations of the 2013 Appraisal of Ipswich Town Centre Opportunity Areas study by DTZ.</p> <p>Due to the need to bring forward the Garden Suburb in tandem with brownfield sites it is not appropriate to set a target for brownfield development.</p> <p>Developers and Anglian Water are in discussion on what capacity improvements will be required in relation to the Garden Suburb development.</p> <p>There are a range of policies in the Plan which are intended to improve the lives of existing residents however in terms of provision of housing the plan has little influence over improving current stock. It should not be assumed that new housing would only be occupied by new residents.</p>	
<p>Table 4.2: needs to recognise the plan does little to improve educational standards in existing schools; little to tackle crime in existing wards, while promoting homes without jobs; little to improve health especially for those in poor housing stock; and nothing to redevelop/improve sub-standard housing. It uses obsolete jobs data and forecasts far exceed historic provision. Impacts on climate change will be negative and the potential sewage issues associated with</p>	<p>Northern Fringe Protection Group</p>	<p>Policy CS13 plans to provide sufficient employment development to provide for the jobs forecast. As a planning document, the plan has limited influence over improving existing stock and directly tackling poor health or improving educational standards.</p> <p>Policy CS17 identifies utilities as infrastructure that would need to be funded by new</p>	<p>None</p>

Summary of Response	Respondent	Council's comments	Action required
growth have not been addressed. These omissions need to be rectified as a key objective.		development.	
Appendix E and Appendix F: as the jobs and homes data used in the Core Strategy is obsolete, have deferred commenting on the specific Impact Assessments until more recent data is utilised.	Northern Fringe Protection Group	Noted. The data used is the most up to date available at the time the Sustainability Appraisal was undertaken.	None
Inconsistencies in the Core Strategy car parking policy and ambiguity in relation to the Bury Road Park and Ride which the Site Allocations development plan document assumes will be reopened and enlarged while the Core Strategy deletes reference to a new park and ride (page 74). The proposals for IP-One expand existing car park capacity but it is rarely insufficient to meet demand. Also inconsistent with the aim for more people to walk and cycle and the reopening / extension of Bury Road Park and Ride. The SA needs to consider these issues accordingly.	Northern Fringe Protection Group	The park and ride reference deleted was in relation to Nacton Road. It should be noted that the proposed extension to the Bury Road park and ride has been deleted due to uncertainty surrounding its future.	None
Evidence base is contested in relation to population projections and employment modelling. Previous rates of forecast jobs growth have not been delivered. Result is high youth unemployment and a low waged and low skilled economy. Impacts of lack of employment need to be assessed against statistics for problematic levels of crime and anti-social behaviour. None of this is explored in the SA. Support the Northern Fringe Protection Group analysis of the jobs issue.	Save Our Country Spaces	As the plan is proposing to support jobs growth, it is unclear how the SA would conclude that this will increase unemployment and crime. Current issues around these are identified in the sustainability issues summary (Table 2.2) and in the baseline in the Scoping Report.	None

Summary of Response	Respondent	Council's comments	Action required
Assumptions, projections and estimates behind the growth agenda pursued since 2001 have not stood the test of time. New jobs have not materialised and Ipswich has lost manufacturing jobs. Result is a predominantly low waged and low skilled economy with a high level of youth need. Ipswich housing is relatively cheap and Ipswich has high urban densities compared to Suffolk. Thus Ipswich features adversely in terms of deprivation in the Institute for Economics and Peace study April 2013. The SA should examine the impacts of lack of employment together with crime and anti-social behaviour statistics.	Save Our Country Spaces	As the plan is proposing to support jobs growth, it is unclear how the SA would conclude that this will increase unemployment and crime. Current issues around these are identified in the sustainability issues summary (Table 2.2) and in the baseline in the Scoping Report.	None
Policy gaps in the Core Strategy review including transport. Ipswich Borough Council has not allowed the known impacts of new development on the transport system to be enshrined in the Core Strategy and to be properly recognised and identified with adverse impacts on air quality, congestion and road safety covered by Section 106 agreements. SA needs to revisit the saved policies from the 1997 Ipswich plan and take account of the policy direction contained in it.	Save Our Country Spaces	Further consideration is being given to assessing traffic (air quality) implications of the Garden Suburb development. However, transport impacts and mitigation measures would need to be considered in detail as part of the planning applications, as identified in the Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014).	Further consideration to air quality / transport has been given through the Sustainability Appraisal process.
No consistency with previous SA work [on CS10], in particular: regarding high levels of house building; mitigation measures required in the event of slow delivery at the Northern Fringe, not allowing multiple starts which could affect community networking; possible adverse impacts on Fynn Valley; the need to adopt the supplementary planning document before permission is granted for development on SA grounds; bringing forward the start date may undermine	Save Our Country Spaces	In order to meet housing need, the Garden Suburb development needs to come forward alongside the redevelopment of brownfield land. It is anticipated in the Supplementary Planning Document Interim Guidance (2014) that around 200 would be built per year from 2018 with housing also coming forward at other locations. The Supplementary Planning Document Interim Guidance (2014) requires initial work at the	None

Summary of Response	Respondent	Council's comments	Action required
previously developed land delivery; the need for a country park as soon as development begins; and viability considerations impacting on open space provision.		country park to take place in the early stages of development of the Henley Gate neighbourhood.	
Query the scoring in the SA. SA should also be an iterative process but to date it has failed to be. Not reassured by the SA and its unconvincing rhetoric contained within the statements and conclusions. The Institute for Economics and Peace 2013 is not referenced or considered. The SA refers to 'revised policies also found to detract from some SA objectives with potential to have negative effects if no mitigation measures are out in place'. What contingencies are proposed if effective mitigation cannot be achieved, particularly around traffic, pollution and flood risk?	Save Our Country Spaces	The SA has influenced the development of the Core Strategy and Policies DPD through the incorporation of mitigation measures where possible / appropriate.  It is not possible for the SA at this level to identify precise effects which can only be identified at the planning application stage.  It is not clear in what way the Institute for Economics and Peace should be referred to.	None
Concerned about the impacts on the existing population. If the Ipswich Garden Suburb is not successfully delivered or competently managed, there will be profound adverse consequences for future generations. A key requirement of sustainable development is that future generations will not be compromised (Brundtland).	Save Our Country Spaces	The Ipswich Garden Suburb Supplementary Planning Document Interim Guidance (2014) contains detailed measures in relation to securing appropriate infrastructure at the planning application stage.	None
Lack of assessment and possible necessary mitigation for impacts on Suffolk Coastal District Council adjacent villages. There is a duty under the adopted Core Strategy and SA work to assess other local authority growth plans and also mitigate pressures on local Ramsar sites and County Wildlife Sites, e.g. Fynn Valley, which will be adversely impacted and put	Save Our Country Spaces	The Habitats Regulations Assessment process has considered the 'in-combination' effects of development in Ipswich and in Suffolk Coastal on the Stour and Orwell Estuaries SPA. The provision of the country park at the Garden Suburb acts as mitigation.	None

Summary of Response	Respondent	Council's comments	Action required
under intolerable pressure by the Northern Fringe development and development in other authority areas.			
Ipswich has failed to hold congestion at 1999 levels or stabilise air pollution. It has a serious and growing air pollution problem which will be further impacted by these plans [for development at the Northern Fringe] as the development is adjacent and will feed through Air Quality Management Area risk zones to travel to the town centre or schools. The SA assessment of this is flawed.	Save Our Country Spaces	The SA identifies that there will potentially be negative effects on air quality from the Garden Suburb development.	None
Unsustainable loss of best and most versatile agricultural land is objected to. It will compromise future generations and the rural economy by the loss of agricultural jobs.	Save Our Country Spaces	There is insufficient brownfield land in Ipswich to meet housing needs. The SA has noted the potential negative effects on agricultural land.	None
The railway causes significant noise nuisance problems from freight movements at night. Increased use of the Felixstowe line needs assessing in relation to the Red House site. The SA makes no mention of this and guidance must be sought from expert stakeholders e.g. Suffolk County Council Noise and Air Quality Manager.	Save Our Country Spaces	It is agreed that the SA has not identified potential noise issues in relation to the Garden Suburb. However it should be noted that the Supplementary Planning Document Interim Guidance (2014) identifies noise as an issue to be addressed through the Environmental Impact Assessment of any planning application.	The assessment of Policy CS10 identifies noise from the Garden Suburb as a potential issue against SA objective HW2.

## Comments on the Scoping Letter Issues in September 2014

Respondent	Summary of Response	IBC response	Suggested Action
Babergh District Council and Mid Suffolk District Council	No comments	Noted	No action needed
Natural England	Satisfied with the scope of the SAs as proposed.	Noted	No action needed
	Supports the proposal to update the evidence base including a refresh of baseline information, key issues within Ipswich and the plans review.	Noted	No action needed
	The need to address potential recreation pressures on the Stour and Orwell Estuaries SPA and Ramsar site will need to be addressed through the SA.	This is being addressed primarily through the Habitats Regulations Assessment process but the conclusions will need to be reflected in the SA.	Once updated, the HRA report results will need to be reflected in SA.
English Heritage	Would like to review the Core Strategy and the Site Allocations DPDs before the next consultation, in relation to comments made previously about the NPPF requirements for a positive strategy in relation to heritage not being met.	A copy of the latest versions of the Core Strategy and Policies DPD and the Site Allocations DPD (as at 10.10.14) have been sent to English Heritage.	No action needed
	Refers to comments made in relation to the previous consultation dated 28 <sup>th</sup> November 2013 and on the interim SA reports.	Comments on the previous SA consultations have been taken on board, as detailed in Appendix D of the Interim SA report published in January 2014.	No action needed.
	Consideration should be given to alternative	Due to the constrained nature of Ipswich	The revised SA of the Core Strategy

Strategic Environmental Assessment and Sustainability Appraisal —Proposed Submission Core Strategy and Development Management Policies Document

Hyder Consulting (UK) Limited-2212959

\\ipswich\ibc\planning and development\spar\local plan oct 2012 onwards\regulation 19 documents\publication versions\core strategy\sustainability appraisals\proposed submission core strategy dpd sustainability appraisal.docx



Respondent	Summary of Response	IBC response	Suggested Action
	spatial options (or sites) in relation to the SA of the Site Allocations document.	Borough there are limited opportunities for meeting the objectively assessed housing need and therefore sites that are appropriate in planning terms and that could realistically be delivered during the plan period have been allocated.	will include an assessment of alternative spatial options along with reasoning as to why the options were discounted or not considered reasonable. In addition, the revised SA of the Sites DPD will include alternative site allocations that were discounted for various reasons.
	Awareness and understanding of the historic environment of archaeological sites and issues was limited in both the site allocations document and sustainability appraisal report issued for consultation in early 2014 and needs addressing as a priority. This includes identifying locations of Scheduled Monuments within the Site Allocations document and understanding the potential of non-scheduled sites, particularly where site allocations are proposed.	The SA baseline identifies the heritage assets within Ipswich along with noting the concentration of assets within central Ipswich.	Details of the relevant heritage assets will be referred to on the sites sheets which form part of the Site Allocations document. The SA will also have regard to non-scheduled sites.
	Welcome the amended wording to SA objective ET9. In the first sub-objective the term 'historic buildings and sites' could be replaced with 'heritage assets'.	This change would be appropriate as it would align the sub-objective with the NPPF.	The sub-objective will be amended.
Anglian Water	Satisfied that the report covers essential matters including the need to protect the water environment and the need to adapt to threats posed by climate change.	Noted	No action needed
Northern Fringe	The SA could better assess the number and	The purpose of the SA is to assess the	The SA will consider the potential

Respondent	Summary of Response	IBC response	Suggested Action
Protection Group	location of new jobs to be created in the Borough relative to new housing, and the implications for the transport network and air pollution. The SA currently assumes a vast number of jobs being created in the town centre but without an evidence base to support this assumption. Air pollution should be considered in relation to EU legal requirements.	<p>contents of the Core Strategy and Sites DPDs. The SA of the Core Strategy has reiterated the number of jobs that will be created in the borough as stated in the Core Strategy and based on the evidence for that.</p> <p>Job forecasts in the Core Strategy have come from the East of England Forecasting Model.</p>	cumulative effects of new housing and employment generation on vehicle movements, air quality and carbon emissions across Ipswich.
Environment Agency	No comments	Noted	No action needed
Save Our Country Spaces	The previous SA did not recognise the job targets were not realistic and were unachievable. The SA should be more evidence based and take account of the views of the public.	The role of the SA is not to challenge evidence produced as part of the production of the Core Strategy but to assess policies based upon the range evidence and information available (including evidence and data produced outwith the plan production process), including the views of the public gathered through consultation.	No action needed
	Disappointed that an employment led strategy has been abandoned without assessment of the effects. The SA should therefore consider the effects of housing resulting in higher levels of unemployment / commuting.	The SA Framework contains objectives that seek to improve the local economy, create new jobs, promote sustainable transport and reduce private car use.	Policies CS7 and CS10 within the Core Strategy will be assessed against these objectives.
	Higher levels of housing and a larger workforce could have implications on salary	SA objective ER2 enables consideration to given to the effect of policies on	No action needed

Respondent	Summary of Response	IBC response	Suggested Action
	levels and therefore poverty levels and this needs to be considered by the SA.	rewarding and satisfying employment opportunities and objective ER1 considers poverty.	
	The impacts on the wider transport network of the change in focus of the Core Strategy should be assessed. Detailed traffic assessment and modelling needs to be undertaken across Ipswich Borough and neighbouring authority areas, taking account of employment sites and housing sites. This is required under the Duty to Cooperate. This needs to consider impacts on air pollution including AQMAs – traffic from the Northern Fringe will pass through AQMAs.	Further consideration will be given to air quality effects arising from the Garden Suburb development. However, detailed traffic assessments would be undertaken at the planning application stage.	The SA of the Core Strategy and Sites DPDs will consider the potential cumulative effect of increasing housing and jobs on traffic movements and air quality.
	The SA should assess and compare the sustainability benefits of a realistic jobs-led Core Strategy and a housing-led Core Strategy, including assessments of a co-operative approach between Ipswich Borough and neighbouring authorities.	The Draft Core Strategy and Policies Focused Review – Interim SA Report (December 2013) assessed the ‘new’ policies against the adopted 2011 policies in this respect and provided commentary on this.	None
	The SA lacks data in relation to monitoring air quality impacts from traffic, particulate impacts and impacts on health from air pollution, including cumulative and compound impacts from multiple sources of air pollution, including impacts from Europe.	Further consideration will be given to air quality effects arising from the Garden Suburb development. Unclear how impacts from Europe could affect Ipswich. It should be noted that mitigation will be / is provided within the Garden Suburb SPD and the proposed Low Emissions SPD and Cycling SPD.	The SA of the Core Strategy and Sites DPDs will consider the potential cumulative effect of increasing housing and jobs on traffic movements and air quality.

Respondent	Summary of Response	IBC response	Suggested Action
	<p>The SA needs to consider the impact of the levels of housing being proposed on jobs, in terms of higher unemployment in the Borough or residents commuting to elsewhere. The SA needs to consider the effect of a larger number of residents competing for a smaller amount of jobs and take account of average salary levels in Ipswich. The SA of the Northern Fringe will need to be revised to take account of this.</p>	<p>Job forecasts are provided through the East of England Forecasting Model. The provision of homes to meet labour supply requirements is covered by the final sub-objective under SA objective ER2. However, whilst there is a link between number of jobs and provision of housing there is no simple 'ratio' that can be applied due to the multiple variables involved. The Core Strategy plans to meet both the land requirements of the jobs forecast and, as far as possible, the housing needs. The baseline of the SA identifies that Ipswich has lower than average salary levels. The 2012 Strategic Housing Market Assessment concluded that household projections would be broadly similar under either the DCLG household projections (population based) or the East of England Forecasting (labour market projections).</p>	<p>The updated Employment Topic Paper will provide greater explanation of the relationship between housing and jobs provision.</p>
	<p>Reference should be made to the implications of the recent Defra consultation on local air quality monitoring.</p>	<p>As a final document has not been published there is no certainty over future changes to local air quality management. The consultation set out a range of options however the purpose of any changes is to focus more action on meeting EU targets and less on the reporting and monitoring processes themselves. This overall intention could</p>	<p>The 'Local Air Quality Management Consultation on options to improve air quality management in England' consultation (DEFRA, 2013) will be added to the review of relevant plans, programmes and environmental objectives in the SA Report appendices along with an explanation of its significance as per our response</p>

Respondent	Summary of Response	IBC response	Suggested Action
		be referred to in the assessment of plans and programmes.	in the column to the left.
	The SA must consider the implications of the Core Strategy allowing the Northern Fringe developments to come forward simultaneously rather than in a phased manner. There may be implications if one or more developers or landowners have financial issues, this may have implications for infrastructure delivery. The use of Grampian conditions or a safety net fund could help to avoid such issues.	The Draft Core strategy and Policies Focused Review – Interim SA Report (December 2013) considered effects of 3,500 dwellings being provided at the Garden Suburb by 2031.	The SA will consider the implications of all housing at the Garden Suburb.
	Comments submitted in relation to previous consultations were submitted as appendices.	Noted. Actions have been made in relation to these comments where relevant/appropriate through previous iterations of the SA, as detailed in appendices to the SA reports.	No action needed.
Save Our Country Spaces  (received late)	The Housing Charter for Suffolk should be considered as part of the SA process.	At present the Housing Charter is in draft format, if finalised prior to the submission of the SA it will be added to the plans, programmes and environmental objectives appendix of the SA Reports. However, it should be noted that its inclusion would not affect any conclusions in the SA.	No action needed.

## Sustainability Appraisal Matrices – Core Strategy Policies

## Spatial Strategy

- Policy CS2: The Location and Nature of Development

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
ET1 To improve air quality	CS2: -	Medium and Long-term Direct and Indirect Reversible Medium / Low Certainty	Borough wide and neighbouring authorities  Notably central Ipswich including AQMAs	<p>The policy focuses a large proportion of growth within the IP One area and district centres which could be seen as a positive as these areas contain the majority of amenities and jobs and can also be accessed by public transport. However, in spite of this it is also likely that overall vehicle trips in these areas will increase which may affect the borough's town centre AQMAs. The other large area of development is the Garden Suburb site. This is also likely to increase vehicle trips which may affect local air quality and potentially the AQMAs. However, a significant emphasis has been placed on promoting sustainable travel to this site which should reduce this impact. This is reiterated in the Garden Suburb SPD. At this stage the significance of this is likely to be negative overall.</p> <p>The policy also provides for c.4,000 homes potentially being developed in neighbouring authority areas in the longer term. Depending on their location this may also affect air quality in their localities. However, without knowing exactly where these could be located there is considerable uncertainty at this stage regarding this.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the</i></p>	<p>Securing a higher density of new homes within housing sites (i.e. approximately a further 4,000 homes) within the borough has significant potential to worsen traffic and air quality in the long-term and may affect the town centre AQMAs. This is in spite of the proposed mitigation measures that would be required to manage this issue. Conversely, there is greater certainty that these issues would not be realised in neighbouring authorities as a result of meeting Ipswich's housing need.</p> <p>This alternative only changes the housing element of Policy CS2, therefore the assessment of other elements are the same as the assessment of CS2.</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				<i>guidance in the SPD, Policy CS5, DM17 and the Travel Ipswich Scheme. When working with neighbouring authorities to address housing need consideration should also be given to impacts on air quality within Ipswich from any development that takes place outside Ipswich.</i>	
ET2 To conserve soil resources and quality	CS2: +/-	Short, Medium and Long-term Direct / Indirect Reversible Low Certainty	Borough wide and neighbouring authorities	Approximately 30% of the housing need within the borough would be developed on previously developed land which represents a sustainable use of soil resources, although this assumes 0% of residual need would be on PDL which in reality may not be the case. However, the remainder, particularly those constructed on the Garden Suburb site would be on greenfield land and would affect soil resources along with the soil's functionality in those areas (along with Grades 2 and 3 Agricultural Land). It is not known where housing would be developed in neighbouring authorities at this stage so the impacts on soil there are uncertain (it should be noted that there are large swaths of Grade 2 and 3 Agricultural Land in neighbouring authorities).	Higher density development means there would be a higher density on previously developed land which would be good for conserving soil resources. However, conversely this option would result in a greater loss of green areas within the Garden Suburb.  We don't know whether development in neighbouring authority areas would be on greenfield / brownfield land therefore we do not know how this alternative would compare to proposed CS2. However, soil resources would be conserved in neighbouring authorities.
ET3 To reduce waste	CS2: 0	N/A	N/A	Effects have been assessed as neutral as the purpose of this policy is to provide information about the location and nature of development which wouldn't strictly affect the amount or proportion of waste generated.	Given this alternative would mean more development within Ipswich rather than neighbouring authorities the volume of waste arisings for Ipswich would be greater and they would be lower in adjacent authorities.
ET4 To reduce the effects of traffic	CS2: -	Medium and Long-term Direct and Indirect	Borough wide and neighbouring	The policy focuses a large proportion of development within the IP One and district centres which could be seen as positive as these areas contain the majority of amenities and	Securing a higher density of new homes within housing sites (i.e. approximately a further 4,000) within the borough has the potential to worsen traffic and congestion in the



SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
upon the environment		Reversible Medium / Low Certainty	authorities	<p>jobs and can also be accessed by public transport. However, in spite of this it is also likely that overall vehicle trips in these areas will increase. The other large area of development is the Garden Suburb site and although there is a significant emphasis placed on promoting sustainable travel to this site (also outlined in the SPD) an increase in car use is, to an extent, inevitable.</p> <p>The policy also provides for c.4,000 homes potentially being developed in neighbouring authority areas in the longer term. Depending on their location this may also affect trip generations in their localities. However, without knowing exactly where these could be located there is considerable uncertainty at this stage regarding this.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and to propose effective measures to mitigate any impacts following the guidance in the SPD, Policy CS5, DM17 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.</i></p>	long-term. This is in spite of the proposed mitigation measures that would be required to manage this issue. Conversely, there is greater certainty that these issues would not be realised in neighbouring authorities as a result of Ipswich's housing need.
ET5 To improve access to key services for all sectors of the	CS2: +	Short, Medium and Long-term Direct / Indirect Reversible Medium / Low	Borough wide and neighbouring authorities	Focussing the majority of new development within walking distance of Ipswich's district centres would benefit this SA Objective as it would facilitate access to essential services and facilities. The policy also seeks to distribute areas of open space throughout Ipswich which is connected to ecological networks and green corridors which again would	Securing a higher density of new homes within the housing sites may help to sustain services than proposed CS2. Although conversely may increase pressure on existing services. However, it should be noted that the proposed CS2 would provide more opportunities to incorporate areas of open space into residential development along with

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
population		Certainty		<p>benefit this SA Objective.</p> <p>The Garden Suburb site would provide a new district centre and facilities (including open space) which would ensure access is not compromised for new residents.</p> <p>Although the above has been assessed as positive overall there remains an element of uncertainty due to the location of new housing required in neighbouring authorities being unknown – therefore access to key services in those areas is unknown.</p>	green infrastructure than the alternative.
ET6 To limit and adapt to climate change	CS2: -	Medium and Long-term Direct and Indirect Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>The policy focuses a large proportion of housing development within the IP One and district centres which could be seen as a positive as these areas contain the majority of amenities and jobs and can also be accessed by public transport. However, in spite of this it is also likely that overall vehicle trips in these areas will increase which may increase carbon emissions. The other large area of development is the Garden Suburb site and although there is a significant emphasis placed on promoting sustainable travel to this site (also outlined within the Garden Suburb SPD), an increase in car use is to an extent, inevitable – along with an increase in carbon emissions.</p> <p>There are also large areas of Flood Zones 2 and 3 within IP One therefore new development has the potential to increase flood risk, although, it is appreciated that this issue is covered elsewhere within the Core Strategy.</p>	By concentrating development in Ipswich there is a greater potential for cycling/walking opportunities. Therefore, may help to minimise emissions from travel related to the c.4,000 new homes (although possibly not reduce overall). Whereas this would be less certain under the proposed CS2 as this would depend on the location as to whether there would be realistic opportunities to walk / cycle. This option may place greater pressure to develop on areas at risk of flooding. In addition, higher density development within areas susceptible to flooding would only exacerbate current issues as there would be a reduced scope to incorporate open space and SuDs measures.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				<p>The policy provides for developing c.4,000 homes through working with neighbouring authorities in the long-term. Depending on the location of new development this may also affect carbon emissions and flooding in their localities. However, without knowing where these could be located there is considerable uncertainty at this stage regarding this.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and to propose effective measures to mitigate any impacts following the guidance in the SPD, Policy CS5, DM17 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.</i></p>	
<p>ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding</p>	<p>CS2: +/-</p>	<p>Short, Medium and Long-term Direct Reversible Medium / Low Certainty</p>	<p>Borough wide and neighbouring authorities</p>	<p>Policy CS2 seeks to promote development at the Garden Suburb which is located on greenfield land which may affect local ground water quality through runoff. However, the policy also seeks to maximise development on previously developed land which would result in positive effects on this SA Objective. As stated above there are large areas of Flood Zones 2 and 3 within IP One therefore locating development in this area has the potential to increase flood risk, although, it is appreciated that this issue is covered elsewhere within the Core Strategy.</p> <p>There remains an element of uncertainty as the location of new homes in neighbouring authorities is not known - therefore effects on ground water quality cannot be</p>	<p>This option may place greater pressure to develop in areas of flood plain given the lack of alternative options. In addition, higher density development within areas susceptible to flooding would exacerbate current issues as there would be a reduced scope to incorporate open space and SuDs measures.</p> <p>Conversely, any potential water pollution or flood risk in neighbouring authorities would be avoided.</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				assessed.	
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS2: +/-	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>The policy does not intend to propose development in areas that are covered by ecological designations. However, the proposals for the central urban areas and IP-One development are near to the Ramsar and SPA designations (also SSSI). It is not anticipated that the proposals would have likely significant effects on these areas directly although it will be important to consider the indirect effects of recreational pressure and undertake Habitats Regulations Assessment in conjunction with Natural England. The Appropriate Assessment concluded no adverse effect upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review alone or in combination with the Suffolk Coastal District Core Strategy and Policies.</p> <p>The policy seeks to create new areas of open space in addition to linking ecological networks and green corridors across Ipswich. The policy seeks to avoid development on ecologically sensitive sites and maximises development on previously developed land.</p> <p>Although the Garden Suburb site in particular takes up a lot of greenfield land, it isn't covered by any statutory ecological designations. However, it should be noted that, the nature of development proposed is likely to result in cumulative losses of habitat (albeit likely to be of lower value) across the borough. For these reasons effects have been assessed as</p>	<p>Securing a higher density of new homes within the housing sites may lead to greater adverse effects on biodiversity on proposed CS2 as there would be less scope to provide new green infrastructure, areas of open space or potential new Local Nature Reserves – all of which create opportunities for habitat creation.</p> <p>As the location of new homes in neighbouring authorities is unknown it is difficult to directly compare the proposed CS2 and this alternative option. Although it should be noted that neighbouring authorities contain a SPAs Ramsar sites, SSSIs etc which would be protected by this approach.</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				<p>both positive and negative.</p> <p>In addition to the above there remains an element of uncertainty against the SA Objective as c.4,000 new homes are proposed in neighbouring authorities and the locations are unknown.</p>	
<p>ET9 To conserve and where appropriate enhance areas and sites of historical importance</p>	<p>CS2: -</p>	<p>Short, Medium and Long-term Direct Reversible Medium / Low Certainty</p>	<p>Borough wide and neighbouring authorities</p>	<p>Effects were recorded as overall negative against Policy CS2. Whilst no known heritage assets are anticipated to be directly affected, new development has the potential to adversely affect the setting of these assets if inappropriate. Conversely, a high quality development near to a heritage asset that complements it or improves an existing poor quality site may benefit its setting. Without knowing these local details at this stage it is not possible to make an accurate assessment against this objective. In addition, general development could also affect unknown archaeological remains although this is also uncertain. The purpose of this policy is not to seek to protect heritage assets, this is provided in DM8. It should be noted that the policy does require new development to demonstrate principles of high quality architecture and design which would only benefit the SA Objective along with the commitment to ensure new development does not compromise heritage assets.</p> <p>There remains an element of uncertainty against Policy CS2 as the location of new housing in neighbouring authorities is currently unknown – therefore effects on heritage assets</p>	<p>Securing a higher density of new homes within the housing sites may lead to greater adverse effects on the setting of heritage assets as there would be less scope to provide soft landscaping that includes green infrastructure. Both of which may offer benefits to the setting of heritage assets.</p> <p>As the location of new homes in neighbouring authorities is unknown it is difficult to directly compare the proposed CS2 and this alternative option.</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				outside the borough are unknown.	
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS2: -	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>The policy seeks to facilitate growth across Ipswich and the Garden Suburb site would result in the removal of a large area of undeveloped land at the urban fringe. However, the policy makes a commitment to ensuring new development is defined to specific areas and demonstrates principles of very high architecture and urban design. <i>Policy DM29 would help to mitigate through requiring new development provides tree planning, new areas of open space and urban greening schemes.</i> It is also likely that the redevelopment of derelict sites within the central urban areas could improve the existing townscape.</p> <p>However, on balance, given the loss of the areas of greenfield land to the north, the effects have been scored as minor negative overall.</p> <p><i>The policy may benefit from a specific reference to ensuring the public realm is of a high quality design along with new structures. Design mitigation is provided in the Garden Suburb SPD, Policy DM5 and the Urban Character SPD.</i></p> <p>There remains an element of uncertainty as the location of new housing in neighbouring authorities required is currently unknown – therefore effects on landscape / townscape character outside the borough is unknown.</p>	<p>Securing a higher density of new homes within the housing sites may lead to greater adverse effects on the setting of landscape / townscape character and quality as there would be less scope to provide soft landscaping including open space and green infrastructure. All of which offer benefits to landscape / townscape character.</p> <p>As the location of homes in neighbouring authorities is not known we cannot directly compare what might have been affected in the proposed CS2 with issues of higher density in this alternative option.</p>
HW1 To improve the	CS2: +	Medium and Long-term	Borough wide and	The policy seeks to promote the use of sustainable modes of transport (i.e. walking, cycling or using public transport)	An increase in density would result in a reduction in the amount of open space and green infrastructure that could

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
health of those most in need		Direct Reversible Medium / Low Certainty	neighbouring authorities	<p>through improving connectivity across Ipswich and ensuring new development has good transport links. The policy also seeks to create new areas of open space throughout the borough which may provide opportunities for recreation. All of the above would seek to promote healthy lifestyles and may help to reduce overall high levels of health and disability deprivation particularly within the west of the borough.</p> <p>Focussing development near to centres could also improve access to healthcare for all.</p> <p>Development at the Garden Suburb would also create accessible formal open space as currently it is agricultural land.</p> <p>There remains an element of uncertainty as the location of c. 4,000 new homes in neighbouring authorities is unknown.</p>	be incorporated into new development which could mean reduced health and wellbeing benefits.
<p>HW2 To improve the quality of life where people live and encourage community participation</p>	CS2: +/-	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>New development is likely to add to current noise and light pollution, particularly on large greenfield sites such as the Garden Suburb site. On smaller, infill sites this is less likely to be significant – i.e. within the IP One area.</p> <p>The redevelopment of previously developed urban sites is likely to be positive and in all cases development with positive design and planning around district centres could help to improve a sense of community.</p> <p>There remains an element of uncertainty regarding the 4,000 homes in neighbouring authorities as their locations are unknown.</p>	<p>Securing a higher density of new homes within the housing sites may increase noise complaints as there would be more people living at each development.</p> <p>There is the potential for higher density development to lead to greater adverse effects on social-cohesion than the proposed CS2. This is because there would be more people living at each development, therefore increasing the chance of potential frictions arising. In addition, an increase in density would result in a reduction in the amount of open space, green infrastructure that could be incorporated into new development.</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
ER1 To reduce poverty and social exclusion	CS2: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>According to the Index of Multiple Deprivation (2010) 26.6% (35,500) of Ipswich's population lives within the most deprived fifth of areas in England, ranking 72 out of 294 local authorities. Nine areas of the town are ranked within the bottom 10% most deprived areas nationally with 7,425 children living in households where no-one works. Promoting significant growth as per this policy would contribute to providing better quality new homes together with creating new employment opportunities and improved access to amenities and jobs via sustainable transport modes.</p> <p>Improving accessibility to areas of open space and creating new areas of open space along with improvements to the borough's green infrastructure may also contribute to reducing overall health and disability deprivation through encouraging healthy lifestyles – although certainty for this is low.</p> <p>There remains an element of uncertainty as the location of new housing in neighbouring authorities required to meet the need of Ipswich's residents is currently unknown.</p>	An increase in density would result in a reduction in the amount of open space, green infrastructure that could be incorporated into new development. Other than this the alternative would perform the same as the proposed CS2 as increasing density is unlikely change existing poverty levels or affect social exclusion.
ER2 To offer everybody the opportunity for rewarding and satisfying	CS2: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>The most deprived area in Ipswich with regards to income and employment is within the town centre or IP One area. Focussing new office, hotel, cultural, leisure and retail – along with educational development within this area may help to alleviate this deprivation.</p> <p>Focussing a proportion of employment development within</p>	<p>Higher housing densities close to employment sites would be beneficial in terms of improving access to jobs – although this would depend upon the types of jobs available in those locations.</p> <p>We do not know where the 4,000 homes in neighbouring authorities would have been located. Therefore comparing</p>



SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
employment				<p>the town centre may also ensure physical accessibility to new jobs is maximised.</p> <p>There remains an element of uncertainty as to whether residents of the c.4,000 new homes located outside the borough would have opportunities for rewarding and satisfying employment as the locations of homes are not known.</p>	<p>this element of the proposed CS2 with the alternative is difficult. Needless to say this alternative would benefit Ipswich's job market to a greater degree than the Proposed CS2 as homes would be focussed within Ipswich rather than rather than neighbouring areas'.</p>
ER3 To help meet the housing requirements for the whole community	CS2: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide and neighbouring authorities	<p>Policy CS2 supports the regeneration and sustainable growth of Ipswich through focusing new residential development in the town centre, Ipswich Village and within the Ipswich Garden Suburb. 13,550 new dwellings are required in Ipswich which represents significant growth. Focussing new housing within the town centre may also help to improve the availability of new high quality housing which may help to improve pockets of existing poor quality homes. The provision of new housing within Ipswich would directly benefit the existing housing stock and may help to reduce the high levels of living environment deprivation within Ipswich.</p> <p>There remains an element of uncertainty as the location of new housing in neighbouring authorities is currently unknown and this may not benefit the housing needs of people wishing to live in Ipswich to the same extent.</p>	<p>The alternative option would ensure more homes are provided within Ipswich itself.</p> <p>However, there may be potential for the types of homes to be affected if higher densities are required, e.g. fewer large family homes. This may result in not all housing needs being met.</p>
ER4 To achieve sustainable	CS2: +	Short, Medium and Long-term Direct	Borough wide	<p>The policy would encourage sustainable economic growth through its commitment to supporting significant regeneration in Ipswich. Growth proposed within the central areas which</p>	<p>The alternative option would perform as per the proposed CS2 as the location and amount of employment land would remain the same although any economic benefits of</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
levels of prosperity and economic growth throughout the plan area		Reversible Medium Certainty		are most accessible i.e. the IP One area where a large cluster of employment development is proposed would encourage new business formation and may potentially help to diversify employment opportunities. For these reasons effects have been assessed as positive.  With some of the long-term housing need being met outside the borough, some economic benefits may be realised in neighbouring authorities instead.	housing growth would be fully realised in Ipswich rather than neighbouring areas. In addition, building at higher densities may mean needs for larger family houses are not met which could affect provision of workforce.
ER5 To support vital and viable town, district and local centres	CS2: ++	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	A key component of the strategy is to develop near to the town and district centres. The policy also seeks to promote the use of sustainable modes of transport (i.e. walking, cycling or using public transport) through improving connectivity across Ipswich and locating new development within areas with good transport links. All of which would seek to ensure new development is highly accessible to shops, services and other essential facilities. The Garden Suburb would provide a new local centre which again would ensure new development is accessible to essential facilities.  There remains an element of uncertainty as the location of c.4,000 new homes in neighbouring authorities is currently unknown – therefore it is unknown as to how this would affect town, district and local centres outside the borough.	Higher density development near to local centres might help with vitality and viability, however, it is uncertain whether this option might put local services under pressure.
ER6 To encourage efficient	CS2: +	Short, Medium and Long-term Direct	Borough wide and neighbouring	The policy seeks to promote growth across Ipswich which may contribute to ensuring there is sufficient land available for business start-ups.	The alternative would perform in a similar way to the Proposed CS2. In addition, higher densities near employment areas may help economic growth through

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
patterns of movement in support of economic growth		Reversible Medium / Low Certainty	authorities	<p>The policy also seeks to focus, office, retail, hotel, leisure and educational employment development within defined areas e.g. the town centre, the Waterfront and Ipswich Village all of which have existing good transport links. The Garden Suburb, however, is located further from the town centre where employment is focused. Local facilities would, however, be provided to support this. <i>Addressing need with neighbouring authorities would be uncertain however, could minimise the impact of traffic within Ipswich from future housing growth.</i></p> <p><i>Therefore, it will be essential for the council to understand the impacts of traffic and economic growth - and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.</i></p>	<p>provision of growth, however, higher densities also have the potential to put strain on traffic infrastructure in local areas.</p> <p>It is hard to compare to what might happen in neighbouring areas as we do not know exactly where new housing would be located in those areas.</p>
ER7 To encourage and accommodate both indigenous and inward investment	CS2: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>The policy would encourage and accommodate indigenous and inward investment through its commitment to supporting significant growth (note Policy CS13 seeks to encourage the provision of approximately 12,500 new jobs and provide at least 30ha for employment use) across Ipswich that is focussed largely within the IP One area and the Garden Suburb. The commitment to providing a high quality built environment, promoting the development of multi-functional green infrastructure in urban areas and providing educational</p>	<p>Securing higher density development may provide for fewer opportunities to incorporate green infrastructure into new development. This can be less appealing to investors.</p> <p>Conversely a bigger employment and customer market would be generated within Ipswich under a higher density option than would be generated by providing for a large proportion of Ipswich's housing needs elsewhere if not around the borough boundary.</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
				<p>facilities may also collectively enhance the reputation of the Ipswich as place people want to live, work and visit.</p> <p>The development of c.4,000 homes outside the borough is less likely to benefit investment within the Ipswich borough boundary itself. However, the provision of c.4,000 new homes outside but around the borough boundary may provide an opportunity to create attractive environments in the Ipswich area.</p>	
<p>CL1 To maintain and improve access to education and skills for both young people and adults</p>	<p>CS2: +</p>	<p>Short, Medium and Long-term Indirect / Direct Reversible Medium / Low Certainty</p>	<p>Borough wide and neighbouring authorities</p>	<p>Improving sustainable access throughout Ipswich may have indirect beneficial effects on this SA Objective as it would indirectly improve access to educational establishments throughout the borough.</p> <p>Focussing office, retail, hotel, cultural and leisure development within the accessible town centre may create opportunities for training for local residents that are within accessible locations. However, certainty for this would be low.</p> <p>There remains an element of uncertainty as how access to education would be affected by the 4,000 new homes required in neighbouring authorities.</p>	<p>A bigger employment and customer market would be generated within Ipswich under a higher density option, therefore this is likely to create more opportunities to improve access to skill for young people and adults. However, conversely access to education may be more difficult due to lack of space to provide education opportunities for 4,000 extra households.</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>	Alternative: Instead of working with neighbouring authorities to provide c.4,000 homes later in the plan period, an alternative approach is to provide for these within Ipswich by increasing the densities of proposed residential sites. NB this would almost double the densities on those sites anticipated to come forward from 2020/21 onwards.
CD1 To minimise potential opportunities for crime and anti-social activity	CS2: ?	N/A	N/A	<p>Redevelopment of derelict town centre sites has potential to reduce opportunities for crime and anti-social behaviour. Also new development across the borough would be required to meet Policy DM5 which addresses crime and safety.</p> <p>However, on balance, it is not possible to clearly identify if the policy as a whole would significantly affect crime levels.</p> <p>There is an element of uncertainty as the location of new housing in neighbouring authorities is not known – therefore an assessment cannot be undertaken.</p>	<p>There is the potential for higher density development to lead to greater adverse effects on social-cohesion than the proposed CS2. This is because there would be more people living at each development, therefore increasing the chance of potential frictions arising. In addition, an increase in density would result in a reduction in the amount of open space, green infrastructure that could be incorporated into new development. Whether this is positive or negative would depend on how it's designed.</p>

## Development of the Strategy

- Policy CS1: Sustainable Development – Climate Change
- Policy CS3: IP-One Area Action Plan
- Policy CS4: Protecting our Assets
- Policy CS5: Improving Accessibility
- Policy CS6: The Ipswich Policy Area

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	CS1: +	Medium and Long-term	Borough wide	<p>Policy CS1 would benefit this SA Objective though its commitment to promoting sustainable transport use and encouraging a 15% modal shift. Reducing the number of private cars on the road over the medium to long term would benefit local air quality.</p> <p>Policy CS3 focusses a large proportion of housing development within the central urban area which is positive in that the area contains the majority of amenities and jobs and is accessible by public transport. However, in spite of this it is also likely that overall vehicle trips in this area will increase which may affect the borough's four designated AQMAs. The provisions of Policy CS1 could help to mitigate this.</p> <p>Policy CS5 directly seeks to improve accessibility throughout the borough on foot, by bicycle and by public transport all of which would contribute to minimising the need to travel by private car over the medium to long term. Again a reduction in the number of private cars on the roads would only benefit local air quality across Ipswich (and potentially the four designated AQMAs).</p> <p>Protecting the borough's built, historical, natural and geological assets under Policy CS4 would not significantly affect this SA Objective. Nor would joint working as promoted in Policy CS6.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance within Policy CS5 and the Travel Ipswich Scheme.</i></p>
	CS3: -	Direct and Indirect		
	CS4: 0	Reversible		
	CS5: ++	Medium Certainty		
	CS6: 0			
ET2 To conserve soil resources	CS1: 0	Short, Medium and Long-term	Borough wide	<p>Policy CS3 seeks to site new development on previously developed land within the IP One area – this represents a sustainable use of soil resources, therefore effects are scored as positive.</p> <p>Policy CS4 would benefit this SA Objective thorough its commitment to protecting geodiversity including geological</p>
	CS3: +	Direct / Indirect		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
and quality	CS4: + CS5: 0 CS6: +	Reversible Medium Certainty		assets which would only benefit soil resources. <i>The beneficial score recorded against Policy CS4 could be strengthened though a direct reference in the policy wording to protecting and enhancing the boroughs soil resource and function.</i>  Joint working with neighbouring authorities may benefit soil resources through areas of previously developed land for new development being identified in other boroughs over greenfield land.
ET3 To reduce waste	CS1: + CS3: 0 CS4: ++ CS5: 0 CS6: 0	Short, Medium and Long-term Indirect / Direct Reversible Medium Certainty	Borough wide	Policy CS1 makes a commitment to ensuring new development incorporates water conservation, capture, recycling and efficiency measures. All of which would benefit this SA Objective.  Effects have been assessed as major positive against Policy CS4 as the policy seeks to encourage the use of reclaimed, renewable, recycled, and low environmental impact materials in construction. In addition, the policy requires new development to minimise waste generated during construction. All of the above would promote the use of recycled materials in construction, encourage a reduced demand for raw materials and potentially reduce the proportion of waste landfilled.  Stating the broad nature and location of development together with improving accessibility and promoting joint working as per Policies CS3, CS5 and CS6 would not clearly affect the waste SA Objective.
ET4 To reduce the effects of traffic upon the environment	CS1: + CS3: - CS4: 0 CS5: + CS6: 0	Medium and Long-term Direct / Indirect Reversible Medium Certainty	Borough wide	Policy CS1 would directly benefit this SA Objective as its purpose is to promote sustainable development which includes supporting the implementation of 'Travel to Ipswich' - this promotes the use of sustainable modes of transport (including walking, cycling and busses) to encourage a 15% modal shift.  Policy CS3 focusses a large proportion of housing development within the central urban area which is positive in that the area contains the majority of amenities and jobs and is accessible by public transport. However, in spite of this it is also likely that overall vehicle trips in this area will increase. The provisions of Policy CS1 could help to mitigate this.  The purpose of Policy CS5 is to improve accessibility across the borough in such a way that it minimises the need to travel and encourages journeys by foot, bicycle and by public transport (bus and rail) would promote the use of sustainable travel modes and reduce vehicle movements.  <i>It will be essential for planning applications to thoroughly assess the impacts of traffic and to propose effective measures to mitigate any impacts following the guidance within Policy CS5 and the Travel Ipswich Scheme.</i>  Policy CS4 and CS6, protecting the borough's built, historical, natural and geological assets and joint working are unlikely to affect the SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET5 To improve access to key services for all sectors of the population	CS1: 0	Short, Medium and Long-term Direct / Indirect Reversible Medium Certainty	Borough wide	<p>Policy CS3 would benefit the SA Objective through its commitment to providing new community facilities and new areas of open space within the readily accessible IP-One Area. The policy also promotes the adjacency of new homes to new employment opportunities which again would benefit access to services.</p> <p>Policy CS4 seeks to conserve and enhance Ipswich's natural environment including designating additional Local Nature Reserves and identifying an ecological network across Ipswich linking into adjacent areas – this would contribute to improving access to open space for residents in Ipswich.</p> <p>The focus of Policy CS5 is to facilitate access across Ipswich, particularly via foot, bicycle and by public transport (bus and rail). The policy also makes a specific focus to prioritising the introduction of an integrated cycle network. As the policy would contribute to ensuring new development improves access and seeks to develop new sustainable access within Ipswich, effects have been recorded as major positive.</p> <p>Joint working may help to locate key services / housing to meets needs of people living in border areas.</p>
	CS3: +			
	CS4: +			
	CS5: ++			
	CS6: +			
ET6 To limit and adapt to climate change	CS1: ++	Medium and Long-term Direct / Indirect Reversible Medium Certainty	Borough wide	<p>Policy CS1 would benefit this SA Objective though its commitment to promoting sustainable transport use and encouraging a 15% modal shift. Reducing the number of vehicle movements over the medium to long term would only reduce carbon emissions from traffic. In addition, a key theme of Policy CS1 is to ensure new development seeks to reduce carbon emissions and tackles the implications climate change in the future. Policy CS1 also seeks to incorporate SuDS where relevant. For these reasons effects have been assessed as major positive.</p> <p>Policy CS3 focusses a large proportion of housing development within the central urban area which is positive in that the area contains the majority of amenities and jobs and is accessible by public transport. However, in spite of this it is also likely that overall vehicle trips in this area will increase and may increase carbon emissions. The provisions of Policy CS1 could help to mitigate this.</p> <p>Policy CS5 directly seeks to improve accessibility throughout the borough on foot, by bicycle and by public transport all of which would contribute to minimising the need to travel by private car over the medium to long term.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance within Policy CS5 and the Travel Ipswich Scheme.</i></p> <p>Protecting the borough's built, historical, natural and geological assets under Policy CS4 would not affect this SA Objective. Nor would joint working as promoted in Policy CS6.</p>
	CS3: -			
	CS4: 0			
	CS5: +			
	CS6: 0			
ET7	CS1: +	Short, Medium and	Borough wide	Policy CS1 would directly benefit the SA Objective through its commitment to supporting the Ipswich Flood Defence



SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS3: +/-	Long-term		Strategy to manage flood risk with in the borough and through its commitment to ensuring new development incorporates water conservation, efficiency measures and SuDS as appropriate.  Effects have been assessed as both positive and negative against Policy CS3 as it seeks to promote growth within the IP One area, although development on previously developed land may benefit groundwater quality, the policy could result in an increase in the demand for water resources and increase the risk of flooding (particularly as large areas in the IP One area are within Flood Zones 2 and 3). However, the Core Strategy should be read as a whole and the benefits outlined above as per Policy CS1 would offset potential negative effects.
	CS4: 0	Direct		
	CS5: 0	Reversible		
	CS6: 0	Medium Certainty		
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS1: +	Short, Medium and Long-term	Borough wide	Policy CS4 would directly benefit this SA Objective as it seeks to conserve the boroughs natural assets. It also seeks to conserve and enhance local biodiversity, protect the boroughs green infrastructure and designate additional Local Nature Reserves. In addition the policy seeks to protect local geodiversity.  <i>It is noted that there are overlaps between this policy and DM31. Nonetheless, there is considerable scope to expand this policy given its overarching nature at the front of the plan, in particular to protect and enhance the borough's designated natural assets including principally European, National and local level designations. A reiteration of the text in DM31 regarding protection of the European Sites is recommended.</i>  Policies CS1, CS3 and CS5 seek to provide and protect wildlife corridors along with contributing to creating green infrastructure, all of which would benefit the SA Objective.
	CS3: +	Direct		
	CS4: ++	Reversible		
	CS5: +	Medium Certainty		
	CS6: 0			
ET9 To conserve and where appropriate enhance areas and sites of historical importance	CS1: 0	Short, Medium and Long-term	Borough wide	Policy CS4 makes a specific commitment to conserving the borough's built and historical assets. The policy goes on to state it would ensure the character and appearance of conservation areas are conserved / enhanced through preparing character appraisals which would only protect and enhance heritage assets and their setting from inappropriate development. The policy also includes a cross reference to development management policies which seek to protect / conserve heritage assets (DM8). The policy may also, over the medium to long term, benefit the Gateway to Wolsey's College of St Mary and St Mary at Quay – both listed on English Heritage's 2013 'Heritage at Risk Register'.  Policy CS3 makes a commitment to creating a heritage assets register within the IP-One Area Action Plan boundary that new development would be required to be mindful of. For this reason effects were recorded as positive as this would contribute to the protection and enhancement of the historic landscape within the defined boundary – which would particularly benefit the town centres Conservation Areas, listed buildings and Scheduled Monuments.
	CS3: +	Direct		
	CS4: ++	Reversible		
	CS5: 0	Medium Certainty		
	CS6: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS1: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>Policy CS3 promotes growth within the IP One area which may lead to negative effects on local townscape character, particularly due to the Conservation Areas within the boundary. However, conversely promoting high quality design and potentially developing on derelict sites may lead to beneficial effects on the SA Objective. For these reasons effects have been assessed as both positive and negative. <i>Although it is not the purpose of the policy it should be ensured new development integrates well into the existing townscape, it is therefore recommended that a specific reference to this is included within the policy.</i></p> <p>Policy CS4 would lead to major positive effects on the SA Objective as it directly seeks to protect the built, historical and natural environment of Ipswich. This would help to protect and enhance townscape character and quality across the borough.</p>
	CS3: +/-			
	CS4: ++			
	CS5: 0			
	CS6: 0			
HW1 To improve the health of those most in need	CS1: +	Medium and Long-term Direct / Indirect Reversible Low Certainty	Borough wide	<p>Policy CS3 seeks to create new areas of open space within the IP One area which may provide opportunities for recreation and ultimately promote healthy lifestyles – although low certainty improving opportunities for recreation may help to reduce overall high levels of health and disability deprivation particularly within the west of the borough. Focussing development within the town centre could also improve access to healthcare for all.</p> <p>Policies CS1, CS3 and CS5 all seek to promote the use of sustainable modes of transport (i.e. walking, cycling or using public transport) through improving connectivity across Ipswich and locating new development in areas with good sustainable transport links - again this may offer health benefits.</p> <p>CS4 may offer indirect health benefits through its commitment to supporting the Greenways Project, protecting green spaces and linking ecological networks across the borough.</p>
	CS3: +			
	CS4: +			
	CS5: +			
	CS6: 0			
HW2 To improve the quality of life where people live and encourage community participation	CS1: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>Positive scores have been recorded against Policy CS3 as it will help provide regeneration, new high-quality homes in accessible locations and other amenities.</p> <p>The redevelopment of previously developed urban sites is likely to be positive and in all cases development with positive design and planning within the IP One area could help to improve a sense of community.</p> <p>Policies CS1, CS3 and CS4 also both seek to create and improve areas of open space across Ipswich along with ensuring new areas are accessible via foot and bicycle which may provide opportunities for community participation.</p>
	CS3: +			
	CS4: +			
	CS5: 0			
	CS6: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ER1 To reduce poverty and social exclusion	CS1: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide	<p>According to the Index of Multiple Deprivation (2010) 26.6% (35,500) of Ipswich's population lives within the most deprived fifth of areas in England, ranking 72 out of 294 local authorities. Nine areas of the town are ranked within the bottom 10% most deprived areas nationally with 7,425 children living in households where no-one works. Promoting growth as per Policy CS3 would contribute to providing better quality new homes together with creating new employment opportunities and improved access to amenities and jobs via sustainable transport modes. This together with safeguarding the Educational Quarter within the town centre would all provide the ingredients to reducing overall deprivation. Policy CS5's commitment to improving sustainable access throughout Ipswich again could help people to access educational facilities and employment – and potentially reduce deprivation.</p> <p>Improving accessibility to areas of open space and creating new areas of open space along with improvements to the boroughs green infrastructure (as per Policies CS1, CS3, CS4 and CS5) may also contribute to reducing overall health and disability deprivation through encouraging healthy lifestyles – although certainty for this is low.</p>
	CS3: +			
	CS4: +			
	CS5: +			
	CS6: 0			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	CS1: 0	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide	<p>The most deprived area in Ipswich with regards to income and employment is within the town centre or IP One area. Focussing new office, hotel, cultural, leisure and retail – along with educational development within this area may help to alleviate this deprivation. Focussing a proportion of employment development within the town centre may also ensure physical accessibility to new jobs is maximised. This with Policy CS5 that seeks to improve access would benefit access to employment further.</p> <p>Safeguarding the Educational Quarter as outlined within Policy CS3 may also contribute to ensuring people are educated to meet local economic needs although certainty is low.</p> <p>Joint working may help co-locate housing and employment opportunities which may help to enable employment land to be allocated in appropriate locations across the Ipswich Planning Area. For this reason a positive score has been recorded against Policy CS6.</p>
	CS3: +			
	CS4: 0			
	CS5: +			
	CS6: +			
ER3 To help meet the housing requirements for the whole community	CS1: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>Policy CS3 supports the regeneration and sustainable growth of Ipswich town centre through focusing a number of residential developments within the IP One area. Focussing new housing within the town centre may help to improve the availability of new high quality housing which may help to improve pockets of existing poor quality homes. The provision of new housing within Ipswich would directly benefit the existing housing stock and may help to reduce the high levels of living environment deprivation within Ipswich.</p> <p>Joint working is fundamental to future housing delivery to meet Ipswich's needs, therefore a positive score has been recorded for Policy CS6.</p>
	CS3: +			
	CS4: 0			
	CS5: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
	CS6: +			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS1: 0	Short, Medium and Long-term	Borough wide	CS3 would encourage sustainable economic growth through its commitment to supporting significant regeneration in Ipswich. Growth proposed within the central areas which are most accessible i.e. the IP One area where a cluster of employment development is proposed would encourage new business formation and may potentially help to diversify employment opportunities. Positive effects would be strengthened through Policy CS5s commitment to improving accessibility across the borough, which may also improve access to jobs.
	CS3: +	Direct		
	CS4: 0	Reversible		
	CS5: +	Medium Certainty		
	CS6: 0			
ER5 To support vital and viable town, district and local centres	CS1: +	Short, Medium and Long-term	Borough wide	Policies CS1, CS3 and CS5 all seek to promote the use of sustainable modes of transport (i.e. walking, cycling or using public transport) through improving connectivity across Ipswich and locating new development within areas with good transport links. All of which would seek to ensure new development is highly accessible to shops, services and other essential facilities. Policy CS3 in particular would benefit the SA Objective as it encourages growth within the central IP One area - proposes a cluster of employment development.
	CS3: ++	Direct		
	CS4: 0	Reversible		
	CS5: +	Medium Certainty		
	CS6: 0			
ER6 To encourage efficient patterns of movement in support of economic	CS1: +	Short, Medium and Long-term	Borough wide	Policy CS3 seeks to focus, office, retail, hotel, leisure and educational employment development within the IP One area which benefits from existing good transport links. That said, it will still be important for <i>the council to understand the impacts of traffic and economic growth - and to propose effective measures to mitigate any impacts following the guidance in Policy CS5 and the Travel Ipswich Scheme.</i>
	CS3: +	Direct		
	CS4: 0	Reversible		
	CS5: +	Medium Certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
growth	CS6: 0			
ER7 To encourage and accommodate both indigenous and inward investment	CS1: + CS3: + CS4: + CS5: + CS6: +	Short, Medium and Long-term Direct Reversible Medium Certainty	IP One area	All the policies seek to support the development of a high quality built environment which encourages the adjacency of homes and jobs along with promoting the development of multi-functional green infrastructure (and safeguarding the Educational Quarter) and improving transport infrastructure which may enhance the reputation of Ipswich as place people want to live, work and visit.
CL1 To maintain and improve access to education and skills for both young people and adults	CS1: 0 CS3: ++ CS4: 0 CS5: + CS6: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	Policy CS3 seeks to safeguard the Education Quarter to support the development of University Campus Suffolk, Suffolk New College and a new primary school which would help to improve the provision of education and training facilities. In addition, locating these facilities in the readily accessible IP –One Area may help to encourage involvement in lifelong learning opportunities and increase educational attainment for all members of society. This would be particularly beneficial within the IP one area as education, skills and training deprivation is considered to be high.  Improving sustainable accessibility throughout Ipswich may have indirect beneficial effects on this SA Objective as it would improve access to educational establishments throughout the borough.
CD1 To minimise potential opportunities for crime and	CS1: 0 CS3: ? CS4: 0	N/A	N/A	Redevelopment of derelict town centre sites under CS3 has potential to reduce opportunities for crime and anti-social behaviour. Also new development across the borough will also be required to meet secure by design principles which should also deter crime.  However, on balance, it is not possible to clearly identify if the policy as a whole would significantly affect crime levels.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
anti-social activity	CS5: 0			
	CS6: 0			

## Live

- Policy CS7: The Amount of New Housing Required
- Policy CS8: The Balance Between Houses and Flats
- Policy CS9: Previously Developed Land Target
- Policy CS10: Ipswich Garden Suburb (formerly Ipswich Northern Fringe)
- Policy CS11: Gypsy and Traveller Accommodation
- Policy CS12: Affordable Housing

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	CS7: -	Medium and Long-term	Borough wide and neighbouring authorities	Under CS7, the 7,234 <sup>21</sup> new homes to be delivered in the borough would increase vehicle movements which may affect local air quality and potentially the four AQMAs. In addition, the amount required on windfall sites and within neighbouring authorities may also affect air quality depending upon their locality, although, without knowing where these could be located there is considerable uncertainty regarding this. However, a significant emphasis has been placed on promoting sustainable travel within the Core Strategy which should reduce this impact. This is reiterated in the Garden Suburb SPD. At this stage the significance of this is uncertain although anticipated to be negative overall for Policies CS7 and CS10. The level of certainty is recorded as medium / low as the increase in traffic won't necessarily result in a significant adverse effect on air quality, particularly due to the focus in the Core Strategy of improving sustainable transport movements.
	CS8: 0	Direct / Indirect		
	CS9: 0	Reversible		
	CS10: -	Medium / Low Certainty		
	CS11: 0			
	CS12: 0			
				In relation to CS10 it should be noted that the AQMAs at Norwich Road and Crown Street may potentially be affected by any additional traffic from the Garden Suburb travelling to the town centre. <i>It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, DM17 and the Travel Ipswich Scheme.</i> Air quality will need to be considered when working with neighbouring authorities to address housing need later in the plan period.

<sup>21</sup> 5,434 through allocations plus 1,800 through windfalls

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET2 To conserve soil resources and quality	CS7: +/-	Short, Medium and Long-term	Borough wide and neighbouring authorities	Siting approximately a third of the residual housing on previously developed land as per Policy CS7 represents a sustainable use of soil resources. However, the remainder, particularly those at the Garden Suburb would be on greenfield land and would affect soil resources along with the soil's functionality in those areas. It is not known where the 5,851 required homes (on windfall sites and) within neighbouring authorities would be developed at this stage therefore there remains an element of uncertainty.  Policy CS9 represents a sustainable use of soil resources as it commits to ensuring new development is focused on previously developed land which would help to preserve soil resources elsewhere in the borough. This is also true for Policy CS11 as cites a preference to locate gypsy and traveller accommodation on previously developed land.
	CS8: 0	Direct		
	CS9: ++	Reversible		
	CS10: -	Medium / Low Certainty		
	CS11: +			
	CS12: 0			
ET3 To reduce waste	CS7: -	Short, Medium and Long-term	Borough wide and neighbouring authorities	The construction of 7,234 new homes within the borough would undoubtedly increase the amount of waste produced. In addition, the amount of new homes required in neighbouring authorities would also increase the amount of waste produced per capita outside of the borough. However, It is recognised that reducing waste is not the focus of Policy CS7, Policy CS1 ensures that new development is developed to minimise waste generation. <i>That said opportunities should be sought (particularly within Policy CS10) to encourage recycling within the new housing developments. Facilities should be provided to encourage reuse/recycling.</i>  A minor positive score has been assessed against Policy CS11 as it directly seeks to ensure new gypsy and traveller accommodation is capable of being serviced with waste disposal and re-cycling facilities.
	CS8: 0	Direct		
	CS9: 0	Reversible		
	CS10: -	Medium / Low Certainty		
	CS11: +			
	CS12: 0			
ET4 To reduce the effects of traffic upon the	CS7: -	Short, Medium and Long-term	Borough wide and neighbouring authorities	Policy CS7 states that 7,234 new homes are to be developed in the borough. This would therefore increase vehicle trips. In addition, those required on windfall sites and in neighbouring authorities would also increase vehicle movements depending upon their locality. Although, without knowing where these could be located there is considerable uncertainty to what extent. However, a significant emphasis has been placed on promoting sustainable travel within the Core Strategy along with Policy CS10s commitment to improving sustainable
	CS8: 0	Direct		
	CS9: 0	Reversible		



SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
environment	CS10: -	Medium / Low Certainty		<p>access to the Garden Suburb site via walking, cycling and promoting the use of Westfield Station to help alleviate negative effects. This is reiterated in the Garden Suburb SPD. At this stage the significance of this is uncertain, however anticipated to be negative overall against Policies CS7 and CS10.</p> <p>Whilst enhancements in public transport provision may be needed at various locations, it is noted in particular that areas around northern Ipswich, Sroughton Road/Jovian Way and the waterfront are currently less well served by public transport.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, DM17 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.</i></p>
	CS11: 0			
	CS12: 0			
ET5 To improve access to key services for all sectors of the population	CS7: 0	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>The Garden Suburb site, due to its size would be required to provide a new district centre along with two local centres providing new residents with a range of essential facilities (including schools, a supermarket, employment development and open space). This would ensure new development maintains and improves access to essential services and facilities. The provision of new services would also guard against putting existing services under pressure.</p> <p>Policy CS11 would ensure any new gypsy and traveller accommodation is located (where possible) within 1km of basic services including the public transport network, along with being accessible safely on foot, by bicycle and by vehicle. As the policy seeks to ensure pitch provision is accessible to essential services effects are assessed as positive.</p>
	CS8: 0	Direct / Indirect		
	CS9: 0	Reversible		
	CS10: +	Medium / Low Certainty		
	CS11: +			
	CS12: 0			
ET6 To limit and adapt to climate change	CS7: -	Medium and Long-term	Borough wide and neighbouring authorities	<p>Policy CS7 states that 7,234 new homes are to be developed in the borough. This would therefore increase vehicle movements across the borough and may increase carbon emissions. In addition, those required on windfall sites and in neighbouring authorities would also increase vehicle movements and carbon emissions depending upon their locality. Although, without knowing where these could be located there is considerable uncertainty to what extent. It should be noted that a significant emphasis has been placed on promoting sustainable travel within the Core Strategy along with Policy CS10s commitment to improving sustainable access to the Garden Suburb site via walking, cycling and promoting the use of Westfield Station which would</p>
	CS8: 0	Direct / Indirect		
	CS9: 0	Reversible		
	CS10: -	Medium / Low Certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	CS11: <b>0</b>			help to alleviate negative effects. This is reiterated in the Garden Suburb SPD. At this stage the significance of this is uncertain, however anticipated to be negative overall against Policies CS7 and CS10.
	CS12: <b>0</b>			<i>It will be essential for planning applications to thoroughly assess the impacts of traffic and increases in carbon emissions from transport and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, DM17 and the Travel Ipswich Scheme. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.</i>
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS7: <b>-</b>	Short, Medium and Long-term	Borough wide and neighbouring authorities	The significant amount of new homes required in the borough (CS7) would only increase the demand for water resources. In addition, the significant amount of new homes proposed could also exacerbate existing flooding issues on land adjacent to the River Orwell, the River Gipping and Belstead Brook.
	CS8: <b>0</b>	Direct		The Garden Suburb is located on greenfield land which may affect local ground water quality though runoff.
	CS9: <b>+</b>	Reversible		However, it should be noted only the small watercourse located within the northern part of the Garden Suburb is considered by the Environment Agency to be at risk of flooding. Although negative effects have been recorded for Policies CS7 and CS10, it is appreciated that the issue of flooding and water efficiency is covered elsewhere within the Core Strategy.
	CS10: <b>-</b>	Medium / Low Certainty		With regards to Policy CS7 there remains an element of uncertainty as the location of a significant number of new homes in neighbouring authorities is not known - therefore effects on ground water quality, resources and flood risk cannot be assessed.
	CS11: <b>+</b>			Policy CS11 ensures that gypsy and traveller accommodation is not located within areas that are at risk of flooding. Therefore beneficial effects have been recorded.
	CS12: <b>0</b>			Seeking to locate development on previously developed land as per Policy CS9 in the first instance would seek to guard against ground water contamination on greenfield sites. However, it should be noted there is insufficient brownfield land to meet housing requirements.
ET8 To conserve and enhance biodiversity and	CS7: <b>+/-</b>	Short, Medium and Long-term	Borough wide and neighbouring authorities	The proposed 7,234 new homes in Ipswich including the significant amount being constructed on the greenfield Garden Suburb site (as per Policy CS10) is likely to result in a loss of wildlife habitat. However, Policy CS10 seeks to create new areas of open space, including a 24.5ha (minimum) county park which could help to mitigate adverse effects on biodiversity resources. The Core Strategy's overarching commitment to link ecological networks and green corridors across Ipswich could also provide further mitigation.
	CS8: <b>0</b>	Direct		
	CS9: <b>+</b>	Reversible		
		Medium / Low		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS10: +/-	Certainty		<p>Although the Garden Suburb site takes up a lot of greenfield land, it is worth noting that it isn't covered by any statutory ecological designations.</p> <p>In addition to the above there remains an element of uncertainty against the SA Objective as the locations of new homes proposed in neighbouring authorities are unknown – therefore effects on biodiversity resources cannot be assessed.</p> <p>Policy CS9 seeks to develop previously developed land in the first instance, which may protect some green field sites from development. However, it should be noted that some brownfield sites can also be rich in wildlife.</p> <p>Policy CS11 commits to ensure new gypsy and traveller accommodation is not sited where it could potentially affect sites of nature conservation importance. This would be particularly beneficial given the boroughs (although fairly urban) number of SSSIs, LNRs and the Stour and Orwell Estuaries SPA and Ramsar site.</p> <p>The Appropriate Assessment has concluded no adverse effects upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review alone or in combination with the Suffolk Coastal District Core Strategy and Policies.</p>
	CS11: +			
	CS12: 0			
ET9 To conserve and where appropriate enhance areas and sites of historical importance	CS7: ?	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>Effects were recorded as uncertain against Policies CS7 and CS10 as whilst no known heritage assets are anticipated to be directly affected, new residential development has the potential to adversely affect the setting of these assets if inappropriate. Conversely, high quality residential development near to a heritage asset that complements it or improves an existing poor quality site may benefit its setting. Without knowing these local details at this stage it is not possible to make an accurate assessment against this objective. In addition, new homes could also affect unknown archaeological remains although this is also uncertain. There also remains further uncertainty with regards to Policy CS7 as the location of new housing in neighbouring authorities required to meet the need of Ipswich's residents is currently unknown – therefore effects on heritage assets outside the borough are unknown.</p> <p>Positive scores were recorded against Policy CS11 as the policy ensures that new gypsy and traveller pitch provision does not have a significant effect on conservation areas. <i>The positive score could be strengthened though removing the reference to conservation areas and historic sites in clauses ii and iii respectively and adding a new clause that states 'heritage assets'.</i></p>
	CS8: 0			
	CS9: 0			
	CS10: ?			
	CS11: +			
	CS12: 0			
ET10	CS7: +/-	Short, Medium and	Borough wide and	Policy CS7 commits to the provision of 7,234 new homes within Ipswich and within the Garden Suburb site

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS8: 0	Long-term Direct Reversible Medium / Low Certainty	neighbouring authorities	<p>(Policy CS10). New residential development on derelict sites within the central urban areas could improve the existing townscape. However, development within the Garden Suburb site would result in the removal of a large area of undeveloped land at the urban fringe which would negatively affect landscape character. It should be noted that Policy CS10 does provide some mitigation, such as ensuring development provides tree planting, new areas of open space and urban greening schemes. Although it is concluded that even with the mitigation built into Policy CS10 the overall effect on landscape would be negative.</p> <p>There also remains further uncertainty with regards to Policy CS7 as the location of new housing in neighbouring authorities required to meet the need of Ipswich's residents is currently unknown – therefore effects on landscape / townscape character outside the borough are unknown.</p> <p>Positive scores were recorded against Policies CS9 and CS11 as the preference to develop previously developed land in the first instance may improve the appearance of some derelict sites in the town centre. In addition, Policy CS11 makes a commitment to ensuring new pitch provision is proportionate in size to nearby settlements, does not impact on the appearance and character of the open countryside and does not affect sites designated for their landscape qualities.</p>
	CS9: +			
	CS10: -			
	CS11: +			
	CS12: 0			
HW1 To improve the health of those most in need	CS7: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>Policy CS10 seeks to create new areas of open space throughout the Garden Suburb along with a 24.5ha (minimum) country park which would provide opportunities for recreation and may encourage people to lead healthy lifestyles. This together with the creation of replacement playing fields may help to reduce overall high levels of health and disability deprivation within Ipswich. Policy CS10 also seeks to provide a health centre within the Garden Suburb. It is worth noting that the Garden Suburb would also create accessible formal open space as currently it is just agricultural fields. Conversely, some indirect negative effect may arise associated with deterioration of the air quality in the north part of the borough.</p> <p>Focussing housing development near to centres could also improve access to healthcare for all.</p> <p>There remains an element of uncertainty under CS7 as the location of the additional new homes required in neighbouring authorities is unknown.</p>
	CS8: 0			
	CS9: 0			
	CS10: +/-			
	CS11: 0			
	CS12: 0			
HW2	CS7: +/-	Short, Medium and	Borough wide and	New residential development is likely to add to current noise and light pollution, particularly at the Garden

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To improve the quality of life where people live and encourage community participation	CS8: 0	Long-term	neighbouring authorities	<p>Suburb. On smaller, infill sites this is less likely to be significant – i.e. within the town centre.</p> <p>Residential development on previously developed urban sites is likely to be positive and in all cases development with positive design and planning around district centres could help to improve a sense of community.</p> <p>There remains an element of uncertainty regarding the additional homes required in neighbouring authorities as their locations are unknown.</p> <p>Policy CS11 makes a direct commitment to ensuing new gypsy and traveller sites are proportionate in size and support community cohesion.</p>
	CS9: 0	Direct		
	CS10: +/-	Reversible		
	CS11: +	Medium / Low Certainty		
	CS12: 0			
ER1 To reduce poverty and social exclusion	CS7: +	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>According to the Index of Multiple Deprivation (2010) 26.6% (35,500) of Ipswich's population lives within the most deprived fifth of areas in England. Promoting significant residential development as per Policy CS7 would contribute to providing better quality new homes, which may help to address existing living environment deprivation – particularly within the IP One area. This together with improving the availability of affordable new homes (Policy CS12) would benefit the SA Objective further through potentially reducing homelessness.</p> <p>The provision of new decent family homes at the Northern Fringe (– although not a deprived area) on the whole may reduce deprivation levels at a borough level.</p> <p>There remains an element of uncertainty as the location of residential development in neighbouring authorities required to meet the need of Ipswich's residents is currently unknown. Therefore it is unknown as to whether it would benefit this SA Objective.</p>
	CS8: 0	Direct		
	CS9: 0	Reversible		
	CS10: +	Medium / Low Certainty		
	CS11: 0			
	CS12: ++			
ER2 To offer everybody the opportunity for rewarding and	CS7: 0	Short, Medium and Long-term	Garden Suburb	<p>Policies CS7, CS8, CS9, CS11 and CS12 all largely relate to housing provision and a preference to develop on previously developed land within the borough. Therefore these policies are unlikely to offer any benefits to the SA Objective.</p> <p>Policy CS10 may contribute, in a relatively minor way, to reducing unemployment and improving accessibility to new jobs within the Garden Suburb through the commitment to non-residential uses which will lead to job creation.</p>
	CS8: 0	Direct		
	CS9: 0	Reversible		
	CS10: +	Medium Certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
satisfying employment	CS11: 0			
	CS12: 0			
ER3 To help meet the housing requirements for the whole community	CS7: ++	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	The provision of 7,234 new homes (Policy CS7) in the borough, including a proportion in the Garden Suburb (Policy CS10) would contribute to ensuring there is sufficient housing to meet identified needs in all areas. In addition, although not the focus of the policy housing would be of a high quality which would only help to reduce high levels of living environment deprivation within the town centre. The commitment to provide a balance between flats and houses (Policy CS8) along with ensuring the provision of affordable new homes (Policy CS12).  New gypsy and traveller pitch provision (Policy CS11) would also ensure all sectors of society are catered for with regards to housing requirements.  There remains an element of uncertainty as the location of new housing in neighbouring authorities is currently unknown.
	CS8: +			
	CS9: 0			
	CS10: ++			
	CS11: ++			
	CS12: ++			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS7: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Garden Suburb	Policies CS7 and CS10 may benefit the SA Objective indirectly through meeting the demand of housing and providing opportunities for the borough to grow and develop. Investment in residential developments would create a number of temporary jobs but also may also attract further inward investment by becoming a better place to live.  Policy CS10 may also contribute to reducing employment and improving accessibility to new jobs within the Garden Suburb through the commitment to creating new jobs within the new district centre and two new local centres (retail, leisure, A1, A2-A5, schools and a health centre) along with jobs. However, it should be noted that effects would be minor as employment provision will be focused within the town centre / IP One area.
	CS8: 0			
	CS9: 0			
	CS10: +			
	CS11: 0			
	CS12: 0			
ER5	CS7: +	Short, Medium and	Garden Suburb	It is considered that the influx of new residents in Ipswich associated with Policy CS7 would have a positive

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To support vital and viable town, district and local centres	CS8: 0	Long-term Direct Reversible Medium Certainty		effect on existing town and district centres. Therefore effects have been assessed as positive. Policy CS10 would contribute to maintaining and improving access to shops, services and facilities within the Garden Suburb. The Garden Suburb would provide a new district centre and two new local centres which would provide new retail, leisure, health and educational facilities.
	CS9: 0			
	CS10: +			
	CS11: 0			
	CS12: 0			
ER6 To encourage efficient patterns of movement in support of economic growth	CS7: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Garden Suburb	Policies CS7, CS8, CS9, CS11 and CS12 all largely relate to housing provision and a preference to develop on previously developed land within the borough. Therefore these policies are unlikely to offer any benefits to this economic SA Objective. Policy CS10 may contribute to ensuring there is sufficient land, buildings and premises available for business start-ups within the Garden Suburb through its commitment to providing a new district centre and two new local centres which will contain new retail, leisure, A1, A2-A5 premises. Policy CS10 also ensures that any planning applications that come forward for the Garden Suburb are supported by an Infrastructure Delivery Plan and also meet criteria outlined in the Garden Suburb development brief SPD which would only ensure infrastructure (including transport) meet the needs of the local area.
	CS8: 0			
	CS9: 0			
	CS10: +			
	CS11: 0			
ER7 To encourage and accommodate both indigenous	CS7: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide	The SA Objective would be indirectly achieved through CS7 through meeting the demand for housing and providing opportunities for the borough to grow and develop. Investment in residential developments would also create a number of temporary jobs but may also attract further inward investment by becoming a better place to live. The significant number of new properties proposed to be constructed in the borough (outlined in CS7 and CS10) may contribute to the development of a high quality built environment, particularly within the Garden Suburb where a new district centre would be developed. This with the provision of multi-functional green infrastructure and the new educational facilities may also collectively enhance the reputation of the Ipswich as
	CS8: 0			
	CS9: 0			
	CS10: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
and inward investment	CS11: 0			place people want to live, work and visit.
	CS12: 0			
CL1 To maintain and improve access to education and skills for both young people and adults	CS7: 0	Medium and Long-term Direct / Indirect Reversible Low Certainty	Garden Suburb	The implementation of Policy CS10 has the potential to improve educational attainment through the provision of a new high school and three primary schools. However, it is uncertain whether the overall educational attainment would be improved significantly as other factors also influence the level of skills and qualifications.
	CS8: 0			
	CS9: 0			
	CS10: +			
	CS11: 0			
	CS12: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	CS7: 0	N/A	N/A	Crime rates are higher than national average within Ipswich with high records of organised crime and hate crime amongst others. An influx of new residents could potentially result in an increase in thefts in the short term, however, this not the only factor that contributes to an increase of crime levels – for this reason effects have been recorded as neutral.
	CS8: 0			
	CS9: 0			
	CS10: 0			
	CS11: 0			



SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	CS12: <b>0</b>			

## Work

- Policy CS13: Planning for Jobs Growth
- Policy CS14: Retail Development and Main Town Centre Uses

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	CS13: +/-	Medium and Long-term	Borough wide	<p>Although reducing traffic movements is not the focus Policies CS13 and CS14 encouraging the provision of 12,500 new jobs in the borough would inevitably increase vehicle movements (particularly within the town centre) which may affect local air quality and potentially the four AQMAs. However, it is worth noting that, a significant emphasis has been placed on promoting sustainable travel within the Core Strategy which should reduce this impact. This is reiterated in the Garden Suburb SPD, Travel Ipswich and Policy CS5.</p> <p><i>It will be essential for planning applications to thoroughly assess the impacts of traffic and air quality and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, Policy DM17 and the Travel Ipswich Scheme.</i></p>
	CS14: +/-	Indirect Reversible Medium Certainty		
ET2 To conserve soil resources and quality	CS13: +/-	Short, Medium and Long-term	Borough wide	<p>Largely encouraging employment, retail and town centre use development within Ipswich town centre, within existing employment sites and at Futura Park would represent a sustainable use of soil resources, as associated new employment development would be on previously developed land. However, some provision would be within the Garden Suburb, therefore on greenfield land – this would affect soil resources along with the soil’s functionality in the area.</p>
	CS14: +	Direct Irreversible Medium Certainty		
ET3 To reduce waste	CS13: -	Medium and Long-term	Borough wide	<p>Although not the focus of Policy CS13 or Policy CS14 encouraging significant growth through the provision of 12,500 new jobs would inevitably increase waste production in the borough. <i>However, this could be partially mitigated though Policy CS4s commitment to ensuring new development is required to minimise the amount of waste generated during construction and through the lifetime of the buildings.</i></p>
	CS14: -	Direct Reversible Medium Certainty		
ET4	CS13: +/-	Medium and Long-	Borough wide	Although reducing traffic movements is not the focus Policies CS13 and CS14 encouraging the

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To reduce the effects of traffic upon the environment	CS14: +/-	term Indirect Reversible Medium Certainty		provision of 12,500 new jobs in the borough period would inevitably increase vehicle movements (particularly within the town centre). However, it is worth noting that, a significant emphasis has been placed on promoting sustainable travel within the Core Strategy which should reduce this impact. This is reiterated in the Garden Suburb SPD, Travel Ipswich and Policy CS5.  <i>It will be essential for planning applications to thoroughly assess the impacts of traffic and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, Policy DM17 and the Travel Ipswich Scheme.</i>
ET5 To improve access to key services for all sectors of the population	CS13: + CS14: +	Short, Medium and Long-term Indirect Reversible Medium Certainty	Town Centre	Policies CS13 and CS14 would benefit the SA Objective through focussing new employment, retail and town centre use provision largely within the accessible the town centre which would only benefit access to services.
ET6 To limit and adapt to climate change	CS13: +/- CS14: +/-	Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	Although reducing traffic movements is not the focus Policies CS13 and CS14 encouraging the provision of 12,500 new jobs in the borough would inevitably increase vehicle movements and associated carbon emissions (particularly within the town centre). However, it is worth noting that, a significant emphasis has been placed on promoting sustainable travel within the Core Strategy which should reduce this impact. This is reiterated in the Garden Suburb SPD, Travel Ipswich, Policy CS5 and Policy DM17. In addition, Policy CS14 would encourage linked trips.  <i>It will be essential for planning applications to thoroughly assess the impacts of traffic (and associated increases in carbon emissions) and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, DM17 and the Travel Ipswich Scheme.</i>
ET7	CS13: +/-	Short, Medium and	Largely within the town	The purpose of Policies CS13 and CS14 is to encourage economic growth across Ipswich rather

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS14: +/-	Long-term Direct Reversible Medium / Low Certainty	centre.	<p>than conserving water resources and reducing flood risk. However, it should be noted that Policy CS13 commitment to encouraging 12,500 new jobs is likely to increase the demand for water resources over the medium to long term. Focussing job provision within the town centre would maximise development on previously developed land which would result in positive effects on this SA Objective by conserving permeable greenfield land. Employment development at the Garden Suburb would be located on greenfield land which could affect local ground water quality through runoff.</p> <p><i>With regards to flooding, it should be ensured that the allocated 30ha (minimum) of new employment development is outside flood zones 2 and 3.</i></p>
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS13: + CS14: +	Short, Medium and Long-term Direct / Indirect Reversible Medium Certainty	Largely within the town centre.	<p>Policy CS13 and CS14 seek to focus the majority of employment development on previously developed land in the first instance, which may protect some greenfield sites from development. However, it should be noted that some brownfield sites can also be rich in wildlife. Policy CS14 also seeks to provide urban greening within the town centre which may offer biodiversity benefits.</p> <p>The Appropriate Assessment has concluded no adverse effects upon the integrity of European sites from the Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review alone or in combination with the Suffolk Coastal District Core Strategy and Policies.</p> <p><i>It should be ensured that the 30ha (minimum) of new employment allocations are located away from statutory designated sites along with areas with high biodiversity. However, Policy DM31 would help to mitigate for this.</i></p>
ET9	CS13: ?	Short, Medium and	Largely within the town	Effects were recorded as uncertain as whilst no known heritage assets are anticipated to be directly

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To conserve and where appropriate enhance areas and sites of historical importance	CS14: ?	Long-term Direct / Indirect Reversible Medium Certainty	centre and Garden Suburb.	affected, new employment development has the potential to adversely affect the setting of assets if inappropriate. Conversely, a high quality development near to a heritage asset that complements it or improves an existing poor quality site may benefit its setting. Without knowing these local details at this stage it is not possible to make an accurate assessment against this objective. In addition, development could also affect unknown archaeological remains although this is also uncertain. The purpose of this policy is not to seek to protect heritage assets, this is provided in DM8.
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS13: +/- CS14: +/-	Short, Medium and Long-term Direct / Indirect Reversible Medium Certainty	Largely within the town centre and Garden Suburb.	<p>Policies CS13 and CS14 largely promote economic growth within the town centre which may lead to negative effects on local townscape character, particularly due to the Conservation Areas within the boundary. However, conversely promoting development that is of a scale appropriate to the size, function and catchment may offer some beneficial effects on the SA Objective.</p> <p>In addition to promoting economic growth in the town centre Policy CS13 would also lead to some development in the Garden Suburb which would result in a loss of agricultural fields, it is likely that this would result in adverse effects on the local landscape quality.</p> <p>For the reasons above effects have been assessed as both positive and negative.</p> <p><i>It should be ensured that the 30ha (minimum) of new employment allocations are well integrated into the existing environment -NB this is provided in Policy DM5.</i></p>
HW1 To improve the health of those most in need	CS13: + CS14: +	Medium and Long-term Indirect Reversible Low Certainty	Town Centre	The policies commitment to largely focussing employment, retail and town centre use development within the accessible town centre may help to encourage healthy lifestyles. In addition, creating more employment opportunities in the borough and may improve overall mental health and overall deprivation.
HW2	CS13: +	Medium and Long-	Town Centre	The policies may indirectly contribute to the achievement of the SA Objective through supporting

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To improve the quality of life where people live and encourage community participation	CS14: +	term Indirect Reversible Low Certainty		the growth of educational facilities and initiatives to improve skills and qualifications levels. The level of educational attainment is low and the local partnerships may have a positive effect on the comprehensive development of the borough and the quality of life. In addition, the cumulative effect of concentrating employment development along with residential development (proposed in Policies CS2 and CS7) within the town centre and the Garden Suburb are likely to increase noise and light pollution within these areas.
ER1 To reduce poverty and social exclusion	CS13: +	Short, Medium and Long-term	Town Centre	Encouraging 12,500 jobs to be created in the borough along with focussing economic development within the accessible town centre would provide the foundation to improve existing high levels of income and employment deprivation within the town centre.
	CS14: +	Direct Reversible Medium Certainty		
ER2 To offer everybody the opportunity for rewarding and satisfying employment	CS13: ++	Short, Medium and Long-term	Town Centre	As above, encouraging the creation of 12,500 jobs along with focussing economic development within the accessible town centre would provide the foundations to improve existing high levels of income and employment deprivation along with reducing unemployment within an area most at need.
	CS14: +	Direct Reversible Medium Certainty		
ER3	CS13: 0	N/A	N/A	There is no clear link between the Policies and the SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To help meet the housing requirements for the whole community	CS14: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS13: ++ CS14: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	Policies CS13 and CS14 would encourage new business formation and ensure there is sufficient land, buildings and premises available to accommodate business start-ups through allocating land for employment use, protecting land in existing employment areas and allocating land for other employment generating uses.  The commitment to encouraging the provision of 12,500 new jobs would also contribute to encouraging economic growth and diversifying employment opportunities within the borough.
ER5 To support vital and viable town, district and local centres	CS13: + CS14: ++	Short, Medium and Long-term Direct Reversible Medium Certainty	Town Centre and district / local centres	Policy CS14 would directly benefit the SA Objective as it seeks to enhance the role, vitality and viability of the Ipswich Central Shopping Area. In addition, focussing new economic development within the town centre (Policies CS13 and CS14) would concentrate new facilities including a mix of retail units within an area that already benefits from good sustainable access.
ER6	CS13: +	Short, Medium and	Town Centre	Policies CS13 and CS14 seek to ensure sufficient land, buildings and premises are available to

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To encourage efficient patterns of movement in support of economic growth	CS14: +	Long-term Direct Reversible Medium Certainty		accommodate business start-up and growth through the commitment to allocate a minimum of 30ha for employment use. The policies also promote the use of sustainable travel modes through largely focussing new employment development within the accessible town centre, over time this may reduce dependence on the private car.  <i>Although not the focus of the policy it will be essential for planning applications to thoroughly assess the impacts of traffic and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5, Policy DM17 and the Travel Ipswich Scheme.</i>
ER7 To encourage and accommodate both indigenous and inward investment	CS13: +	Short, Medium and Long-term	Town Centre and employment allocations	Policies CS13 and CS14 would encourage inward investment and new business formation though the commitment to encouraging 12,500 new jobs, allocating a minimum of 30ha for employment development and protecting land for employment in existing employment use.  Policy CS14 also seeks to ensure new town centre and retail development provides environmental enhancements along with urban greening which may contribute to the development of multi-functional green infrastructure in urban areas.  Collectively the above may help to enhance the reputation of urban areas as place to live, work and visit.
	CS14: +	Direct / Indirect Reversible Low certainty		
CL1 To maintain and improve access to education and skills for both young people and adults	CS13: +	Medium and Long-term	Borough wide	The implementation of Policies CS13 and CS14 have the potential to improve educational attainment through the strategic provision of new schools and create new opportunities to improve skills therefore effects have been assessed as positive.
	CS14: +	Direct / Indirect Reversible Low certainty		
CD1	CS13: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.



SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To minimise potential opportunities for crime and anti-social activity	CS14: <b>0</b>			

## Learn

- Policy CS15: Education Provision

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	CS15: +	Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	The provision of educational facilities in accessible locations would contribute towards reducing reliance on private vehicles and encouraging the use of sustainable modes of transport such as walking which would indirectly help to make some contributions towards improving air quality.
ET2 To conserve soil resources and quality	CS15: +/-	Medium and Long-term Direct Reversible and Irreversible Medium Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	Ipswich is predominantly urban with the Garden Suburb greenfield agricultural land. The provision of educational facilities at existing sites such as Suffolk New College and University Campus Suffolk as well as the development and safeguarding of land for educational use would support the SA Objective by providing facilities on previously developed land. Development within the Garden Suburb would result in the loss of greenfield land and soil resources which would not support the SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET3 To reduce waste	CS15: -	Medium and Long term Indirect Reversible Medium Certainty	Suffolk New College University Campus Suffolk  Ipswich Garden Suburb  Safeguarded areas identified across the borough	New educational facilities in the long term would increase waste production.  <i>New development should be required to minimise the amount of waste generated during construction and through the lifetime of the building.</i>
ET4 To reduce the effects of traffic upon the environment	CS15: +	Medium and Long term Indirect Reversible Medium Certainty	Areas surrounding Suffolk New College and University Campus Suffolk  Ipswich Garden Suburb  Safeguarded areas identified across the borough	The policy seeks to provide new educational facilities in accessible locations which in the long term would help to reduce the effects of traffic upon the environment by reducing reliance on private cars and encouraging walking, cycling and public transport.  <i>It is recommended that the policy should be linked to Travel Ipswich.</i>
ET5 To improve access to key services for all sectors of the population	CS15: +	Medium and Long term Indirect Reversible Medium Certainty	Areas surrounding Local Centres, District Centres and schools identified for development	The policy seeks to provide schools in sustainable locations and to provide nursery and children's centres within or adjacent to local and district centres or co-located within schools in order to facilitate linked trips by parents. These provisions would help to improve access to these facilities for communities.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET6 To limit and adapt to climate change	CS15: +	Long term Indirect Reversible Medium Certainty	Suffolk New College University Campus Suffolk  Ipswich Garden Suburb  Safeguarded areas identified across the borough	The provision of new educational facilities in accessible locations including additional nursery and children's centres within or adjacent to district and local centres would contribute towards reducing reliance on private cars and increase the use sustainable modes of travel such as walking, cycling and public transport.  <i>It is recommended that new educational development should meet BREEAM standards.</i>
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS15: 0	N/A	N/A	The policy is not considered to have any significant effect on protecting and enhancing the quality of water features. It is noted that development however in the long term would see an increase in water use though not to a level that is considered to be significant level.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
<p>ET8</p> <p>To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs</p>	CS15: +/-	<p>Medium and Long term</p> <p>Indirect</p> <p>Reversible</p> <p>Medium Certainty</p>	<p>Suffolk New College University Campus Suffolk</p> <p>Ipswich Garden Suburb</p> <p>Safeguarded areas identified across the borough</p>	<p>New educational development could affect biodiversity resources across the borough. However, new educational development within the IP One area is likely to utilise previously developed land which would protect greenfield sites. However, the provision of three primary schools and a secondary school within the Garden Suburb on greenfield land would result in the loss of wildlife habitats. Although it should be noted that the Garden Suburb is not covered by any statutory ecological designations. Mitigation measures such as soft landscaping, improvements to green infrastructure / wildlife corridors and the provision of a country park within the Garden Suburb would only help to reduce negative impacts to biodiversity.</p>
<p>ET9</p> <p>To conserve and where appropriate enhance areas and sites of historical importance</p>	CS15: ?	<p>Medium and Long term</p> <p>Indirect</p> <p>Reversible</p> <p>Medium Certainty</p>	<p>Suffolk New College University Campus Suffolk</p> <p>Ipswich Garden Suburb</p> <p>Safeguarded areas identified across the borough</p>	<p>There are conservation areas, Scheduled Monuments, listed buildings and other heritage assets across Ipswich which could be affected by the development of new educational facilities however this would be dependent upon the location of sites which will be selected for development and safeguarding through the Site Allocations DPD (Incorporating IP-One Area Action Plan). Development could affect the setting of these features if located in close proximity. There is also potential to uncover previously undiscovered archaeological remains during construction activities. This policy could include a cross reference to policies CS4 and DM8 in order to encourage new development to protect heritage features.</p> <p><i>Policy DM8 ensures that land identified for educational use that is close to heritage assets such as listed buildings or Conservation Areas is developed sensitively and in keeping with local townscape character.</i></p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS15: +	Long term Indirect Reversible Medium Certainty	Suffolk New College University Campus Suffolk  Ipswich Garden Suburb  Safeguarded areas identified across the borough	Development of educational facilities could support the SA Objective by using high quality design that ensures new educational development complements and enhances the character and quality of the local townscape – this would be particularly true within the IP One area if derelicts sites are redeveloped.
HW1 To improve the health of those most in need	CS15: +	Long term Indirect Reversible Low Certainty	Areas surrounding Suffolk New College, University Campus Suffolk  Ipswich Garden Suburb  Safeguarded areas identified across the borough	The provision of educational facilities in accessible locations would partially help to support the SA Objective through encouraging people to walking / cycle to school.
HW2 To improve the quality of life where people live and encourage community participation	CS15: +	Medium and Long term Indirect Reversible Low Certainty	Areas surrounding Suffolk New College, University Campus Suffolk  Ipswich Garden Suburb  Safeguarded areas identified across the borough	The policy seeks to encourage the use of educational facilities for community uses out of hours. This would encourage people to make use of these facilities during previously unavailable hours which would help to improve quality of life and encourage community participation.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ER1 To reduce poverty and social exclusion	CS15: +	Medium and Long term Indirect Reversible Low Certainty	Areas surrounding Suffolk New College, University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	The policy seeks to encourage the use of educational facilities for community uses out of hours. This would help to partially support the reduction of social exclusion as it would help to encourage people within the community to engage with each other and make use of the facilities available.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	CS15: +	Short, Medium and Long term Indirect Reversible Medium Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	The development of educational facilities would create construction jobs and elementary jobs though this would not be to a significant level. There would be opportunities provided for employment including teaching jobs.
ER3 To help meet the housing requirements for the whole community	CS15: 0	N/A	N/A	The policy is not considered to have any significant effect on helping to meet the housing requirements for the whole community.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS15: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
ER5 To support vital and viable town, district and local centres	CS15: +	Medium and Long term Indirect Reversible Medium Certainty	Suffolk New College University Campus Suffolk Ipswich Garden Suburb Safeguarded areas identified across the borough	The development of additional nursery and children's centres located adjacent to Local and District Centres will help to support the vitality and viability of the centres. The developments at Suffolk New College and University Campus Suffolk will also help to support the future wellbeing and prosperity of Ipswich.
ER6 To encourage efficient patterns of movement in support of economic growth	CS15: 0	N/A	N/A	There is no clear relationship between the policy and the SA Objective.



SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ER7 To encourage and accommodate both indigenous and inward investment	CS15: +	Medium and Long term Indirect Reversible Low Certainty	Suffolk New College University Campus Suffolk  Ipswich Garden Suburb  Safeguarded areas identified across the borough	The provision of educational facilities in accessible locations including Local and District Centres would help to support the vitality and viability of these areas and would help to support the reputation of urban areas as places to live, work and visit which in turn would make contributions towards encouraging and accommodating both indigenous and inward investment. Further education establishments are often regarded as positive hubs of the knowledge industry and can attract wider businesses to locate near them. Having a well-educated workforce may also contribute towards this SA Objective.
CL1 To maintain and improve access to education and skills for both young people and adults	CS15: ++	Medium and Long term Indirect Reversible High Certainty	Suffolk New College University Campus Suffolk  Ipswich Garden Suburb  Safeguarded areas identified across the borough	Land identified for further development of educational facilities will be safeguarded through the Sites DPD (Incorporating IP-One Area Action Plan). This includes new primary school provision all of which in the medium to long term will help to improve access to education and skills for both young people and adults. The provision of additional nursery and children's centres within or adjacent to District and Local Centres or co-located within schools will also help to improve access to educational facilities. Educational use land safeguarded through policy CS10 at Ipswich Garden suburb will help to support the SA Objective in the long term.  <i>It is recommended that the policy should refer to safeguarded land being accessible by sustainable transport.</i>
CD1 To minimise potential opportunities for crime and anti-social activity	CS15: 0	N/A	N/A	Whilst university campuses can sometimes be hotspots for petty-crime it should be possible to mitigate this through design features. On balance, the policy is not considered to have any significant effect on minimising potential opportunities for crime and antisocial activity.

---

Strategic Environmental Assessment and Sustainability Appraisal —Proposed Submission Core Strategy and  
Development Management Policies Document

Hyder Consulting (UK) Limited-2212959

\\ipswich\ibc\planning and development\spa\local plan oct 2012 onwards\regulation 19 documents\publication versions\core  
strategy\sustainability appraisals\proposed submission core strategy dpd sustainability appraisal.docx

## Play

- Policy CS16: Green Infrastructure, Sport and Recreation

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	CS16: +	Short, Medium and Long term Indirect Reversible Low Certainty	Borough wide	The policy seeks to enhance and extend the ecological network and green corridors and open spaces. It requires that all new development contributes to the provision of open space. The policy also seeks to improve green infrastructure and to connect radial networks including the publically accessible green rim around Ipswich. All of these provisions will make minor contributions towards improving air quality because they will encourage sustainable travel across these networks.
ET2 To conserve soil resources and quality	CS16: +	Medium and Long term Direct and Indirect Reversible Medium Certainty	Borough wide	The policy seeks to enhance and extend the ecological network and green corridors and open spaces. These elements of the policy would help to maintain soil quality as they would be protected from development.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET3 To reduce waste	CS16: 0	N/A	N/A	The policy is not considered to have any significant effect on reducing waste.
ET4 To reduce the effects of traffic upon the environment	CS16: +	Medium and Long term Indirect Reversible Low Certainty	Borough wide	The policy seeks to enhance and extend the ecological network and green corridors and open spaces. The policy seeks to improve green infrastructure provision and to link radial networks including the publically accessible green rim around Ipswich. All of these provisions will make minor contributions towards reducing effects of traffic upon the environment by encouraging more sustainable movement across networks.
ET5 To improve access to key services for all sectors of the population	CS16: +	Short, Medium and Long term Indirect Reversible Medium Certainty	Borough wide	Ipswich Borough Council seek to work with partners in order to improve green infrastructure provision whilst linking radial ecological networks and green corridors with a publicly accessible green rim around Ipswich. The policy also seeks to extend the country park and promote improved access to recreational and sports facilities all of which will help to improve sustainable access within the Borough to key services and open spaces.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET6 To limit and adapt to climate change	CS16: +	Short, Medium and Long term Indirect Reversible Low Certainty	Borough wide	The policy seeks to provide green infrastructure across the borough which would help to improve air quality by encouraging sustainable travel such as walking and cycling. This would help to limit emissions and would contribute to limiting and adapting to climate change. The provision of green infrastructure would also help to maintain flood plain and permeable green areas which would contribute to adapting to climate change.
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS16: +	N/A	N/A	The provision of green infrastructure could provide opportunities to incorporate SuDs features and it may also be possible that in some cases green spaces coincide with flood zones. Also green infrastructure in itself would be permeable and hence would help to reduce flood risk. This would offer some benefits to reducing the impact of flooding.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS16: ++	Short, Medium and Long term Indirect Reversible High Certainty	Borough wide	The policy seeks to safeguard, protect and enhance biodiversity and the environment and in particular seeks to reduce the impacts on birds in the Orwell Estuary SPA through a management plan for Orwell Country Park which would help to protect wildlife within the designated site. The policy requires major development to include on-site public space, wildlife habitat and networks connecting to existing ecological networks where they exist close to the proposed development. All of this would help to conserve and enhance biodiversity.
ET9 To conserve and where appropriate enhance areas and sites of historical importance	CS16: 0	N/A	N/A	There is no link between the Policy and the SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS16: +	Short, Medium and Long term Indirect Reversible Medium Certainty	Borough wide	The provision of accessible and well-designed green infrastructure across the borough including the publicly accessible green rim, a new country park and visitor centre within the Ipswich Garden Suburb and an extension to Orwell Country Park and possible provision of a visitor facility would each contribute towards conserving and enhancing the quality and local distinctiveness of landscapes and townscapes.
HW1 To improve the health of those most in need	CS16: +	Short, Medium and Long term Indirect Reversible Low Certainty	Borough wide	The provision of safe accessible open spaces, sport and recreational facilities would encourage healthy lifestyles which would contribute to the achievement of this SA Objective.
HW2 To improve the quality of life where people live and encourage community participation	CS16: +	Short, Medium and Long term Indirect Reversible Medium Certainty	Borough wide	The provision of safe and freely accessible open spaces, sport and recreational facilities will help to encourage community participation. They would also help to protect residents from amenity pollution and noise and light pollution which would contribute towards improving the quality of life where people live.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ER1 To reduce poverty and social exclusion	CS16: 0	N/A	N/A	The policy encourages healthier lifestyles through the provision sustainably accessible open spaces, recreational and outdoor facilities. This may help to reduce high levels of health and disability deprivation however it is not considered that this would be to a significant level.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	CS16: 0	N/A	N/A	There is no link between the Policy and the SA Objective.
ER3 To help meet the housing requirements for the whole community	CS16: 0	N/A	N/A	There is no link between the Policy and the SA Objective.



SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS16: 0	N/A	N/A	There is no link between the Policy and the SA Objective.
ER5 To support vital and viable town, district and local centres	CS16: +	Short, Medium and Long term Indirect Reversible Medium Certainty	Borough wide	The policy seeks to ensure that green spaces are well designed, well managed and freely accessible. Providing green spaces in locations which would also help to improve access to shops, services and facilities across the Borough which would benefit communities and would support the vitality and viability of District and Local Centres.
ER6 To encourage efficient patterns of movement in support of economic growth	CS16: 0	N/A	N/A	There is no link between the Policy and the SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ER7 To encourage and accommodate both indigenous and inward investment	CS16: +	Medium and Long term Indirect Reversible Medium Certainty	Borough wide	The provision of new green infrastructure and open spaces and management plans for these areas would help to improve the image and reputation of local areas as places to live, work and visit which would make contributions towards encouraging and accommodating both indigenous and inward investment.
CL1 To maintain and improve access to education and skills for both young people and adults	CS16: 0	N/A	N/A	It is not considered that the policy would have a significant effect on achieving the SA Objective, however, the provision of publicly accessible green infrastructure may partially help to support the SA Objective if this would enable better access to education or training establishments.
CD1 To minimise potential opportunities for crime and anti-social activity	CS16: +	Short, Medium and Long term Indirect Reversible Low Certainty	Borough wide	The policy seeks to support proposals that create safe parks and open spaces and it also seeks to protect and enhance open spaces and sport and recreational facilities. The provision of safe open spaces would make some contributions towards minimising potential opportunities for crime and anti-social behaviour.

## Infrastructure

- Policy CS17: Delivering Infrastructure
- Policy CS18: Strategic Flood Defence
- Policy CS19: Provision of Health Services
- Policy CS20: Key Transport Proposals

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	CS17: +	Medium and Long-term Direct / Indirect Reversible Medium Certainty	Borough wide	<p>Whilst the primary focus of the infrastructure policies is not to address air quality issues, it is considered that adequate infrastructure would result in relief of congestion at key routes of the borough. In addition, the Community Infrastructure Levy (CIL) will help address road capacity and congestion issues off-site and thus result in improved air quality in the long term. The key transport proposals included in Policy CS20 aim to reduce vehicle movements through improved bus station provision, shuttle bus provision, new pedestrian links and high quality cycle routes.</p> <p>In addition, Policy CS19 considers travel implications when allocating sites for health facilities. The SA Objective will be achieved through the allocation of new health facilities in or adjacent to the town centre or a district/local centre and the requirement for submission of a Travel Plan with the proposal for development at Heath Road.</p>
	CS18: 0			
	CS19: +			
	CS20: +			
ET2 To conserve soil resources and quality	CS17: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Within the town centre	The development of the flood barrier barrier would enable use of previously developed land within the town centre, therefore positive effects have been recorded against Policy CS18.
	CS18: +			
	CS19: 0			
	CS20: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET3 To reduce waste	CS17: 0	N/A	N/A	Waste may be generated as a result of construction activities related to key infrastructure improvements; however it is considered unlikely to affect the SA Objective significantly. The policies would not contribute to reduction of waste per capita or the proportion of waste sent to landfill within the borough.
	CS18: 0			
	CS19: 0			
	CS20: 0			
ET4 To reduce the effects of traffic upon the environment	CS17: +	Medium and Long-term	Borough wide	Policies CS17, CS19, and CS20 would contribute to the achievement of the SA Objective through the provision of adequate infrastructure and subsequent relief of congestion at key routes of the borough. Highways infrastructure will be improved through the implementation of Policy CS20 to enable east-west movements and meet the need for high quality walking and cycling links around the Waterfront area. New health facilities (Policy CS19) will promote the use of sustainable travel modes through the implementation of a travel plan and appropriate location.
	CS18: 0	Indirect		
	CS19: +	Reversible		
	CS20: ++	Medium certainty		
ET5 To improve access to key services for all sectors of the	CS17: +	Medium and Long-term	Borough wide Island site Waterfront and town centre	Policies CS17 and CS20 will contribute to the achievement of the SA Objective through improved access between the Central Shopping area, Waterfront and railway station. Access to open space, school and health facilities and play areas will be ensured through specific site allocation and the provision of new social and green infrastructure, sports and leisure facilities to serve the whole borough. Policy CS20 seeks to provide a road bridge as well as pedestrian and cycle bridge across the Wet dock resulting in improved access to and from the Island site.
	CS18: 0	Direct / Indirect		
	CS19: +	Reversible		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
population	CS20: ++	High certainty		
ET6 To limit and adapt to climate change	CS17: + CS18: + CS19: + CS20: +	Medium and Long-term Direct / Indirect Reversible	Waterfront Island Site	The Environment Agency has identified a risk of flooding on land adjacent to the River Orwell, the River Gipping, Belstead Brook and the small watercourse located within the northern part of the Northern Fringe. Flood defences are identified as key strategic infrastructure in CS17. Policy CS18 will contribute to the achievement of the SA Objective through delivery of strategic flood infrastructure including installing a tidal flood barrier as well as repairs to existing tidal and fluvial defences upstream.  Policy CS20 aims to reduce dependency on private car by 15% through the Travel Ipswich Scheme which will contribute to the reduction of carbon emissions from transport. Similarly, Policy CS19 promotes the use of sustainable travel modes through the implementation of travel plans and appropriate location.
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS17: + CS18: ++ CS19: 0 CS20: 0	Medium and Long-term Direct Reversible Medium certainty	Borough wide Waterfront Island Site	Water management infrastructure is identified within Policy CS17 as strategic infrastructure. When delivering water management infrastructure <i>opportunities should be sought to consider sustainable solutions to drainage system and sewage collection as well as sustainable water supply network (this is provided in Policies CS1 and DM4)</i> . Flood risk will be reduced through the implementation of Policy CS17 and Policy CS18.
ET8 To conserve and enhance	CS17: + CS18: 0	Long-term Direct / Indirect Reversible	Borough wide	Strategic green infrastructure along with town centre environmental enhancements will be financed through the implementation of Policy CS17. Positive effects would occur with the provision of a country park and open space. This will result in protection and enhancement of wildlife corridors which will be beneficial to any rare or

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS19: 0	Medium certainty		<p>endangered species. The policy will also provide opportunities for people to access wildlife and open green spaces therefore it is considered that the SA Objective will be achieved.</p> <p>It is not anticipated that any of the proposed health facilities/key transport improvements will have any significant negative effects on designated sites of nature conservation importance due to their location. It is anticipated that local issues should be able to be mitigated through appropriate design and management.</p>
	CS20: 0			
ET9 To conserve and where appropriate enhance areas and sites of historical importance	CS17: +	Medium and Long-term	Borough wide	<p>There are a great number of designated heritage assets (e.g. listed buildings) within the borough boundary and the majority of them are concentrated in the town centre. Policy CS17 may contribute to the achievement of the SA Objective through allocation of funds to enhance settings of heritage assets. Although no heritage or archaeology assets were specifically listed in the key strategic infrastructure requirements, the policy seeks to protect and conserve areas and sites of historical importance in a broader category of infrastructure to be secured or financed from new developments. There are no specific commitments as to which heritage assets (e.g. listed buildings, Historic Parks) will be restored or enhanced; <i>therefore it will be beneficial to create a borough wide heritage assets register and identify the ones 'at risk' (as identified on English Heritages 'at risk' register) or with high priority.</i></p> <p>In addition it should be noted that the construction of a flood defence barrier may protect heritage assets from flood damage.</p>
	CS18: +	Direct / Indirect		
	CS19: 0	Reversible		
	CS20: +	Medium certainty		
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	CS17: +	Short, Medium and Long-term	Borough wide	<p>Policy CS17 is likely to contribute to the achievement of the SA Objective through allocation of funds to investment into public realm improvements, green infrastructure, and town centre environmental enhancements. Transport proposals and new health facilities (CS20 and CS19) may have a negative impact on townscape; however high standards of design will be required through the implementation of other policies in the Core Strategy.</p>
	CS18: 0	Direct		
	CS19: -	Reversible		
	CS20: -	Medium certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
HW1 To improve the health of those most in need	CS17: +	Medium and Long-term	Borough wide	<p>Policies CS17, CS19 and CS20 seek to promote the use of sustainable modes of transport (i.e. walking, cycling or using public transport) through improved pedestrian and cycle routes, location of health facilities which has good transport links and the implementation of the Travel Ipswich Scheme. Policy CS17 seeks to create new areas of open space and a country park which may provide opportunities for recreation. Sport and leisure facilities will also be delivered through the implementation of policy CS17. In addition, policy CS19 has a specific focus on the adequate provision of health infrastructure at easily accessible locations. All of the above would seek to promote healthy lifestyles and may help to reduce overall high levels of health and disability deprivation. The promotion of sustainable transport may contribute to reducing vehicle emissions which can have positive health effects in the long term.</p> <p>The effects associated with the implementation of CS18 are also assessed as positive as reducing flood risk can benefit people's health and wellbeing.</p>
	CS18: +	Direct / Indirect		
	CS19: ++	Reversible		
	CS20: +	Low certainty		
HW2 To improve the quality of life where people live and encourage community participation	CS17: +	Medium and Long-term	Borough wide	<p>On the whole the quality of life will be improved though the provision of key infrastructure facilities e.g. schools, flood defences, key transport links etc. as listed in Policy CS17. Health benefits are identified with regard to reduced flood risk. Community participation will be encouraged with the provision of community facilities, sport and leisure facilities and the creation of a country park serving the whole borough. The policy also seeks to ensure that open space and children's play areas are provided. Access improvements included in policy CS20 will also contribute to the achievement of the SA Objective through the provision of high quality road and pedestrian/cycling network.</p>
	CS18: +	Direct / Indirect		
	CS19: 0	Reversible		
	CS20: +	Medium certainty		
ER1 To reduce poverty and social exclusion	CS17: +	Medium and Long-term	Borough wide	<p>Delivering infrastructure and Improved overall accessibility (CS17 and CS20) may contribute to improving social inclusion therefore it is considered that Policies CS17 and CS20 would have a positive effect and would contribute indirectly to the achievement of the SA Objective.</p>
	CS18: 0	Indirect		
	CS19: 0	Reversible		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	CS20: +	Low certainty		
ER2 To offer everybody the opportunity for rewarding and satisfying employment	CS17: 0 CS18: 0 CS19: 0 CS20: 0	N/A	N/A	The primary focus of this set of policies is not to address employment issues. Although some job opportunities will be created through local infrastructure projects and Policy CS18 may result in a greater availability of employment land it is anticipated that overall effect on employment figures will be negligible.
ER3 To help meet the housing requirements for the whole community	CS17: 0 CS18: 0 CS19: 0 CS20: 0	N/A	N/A	Housing provision is not a primary function of these policies. The policies would not contribute to the availability of housing to meet the identified needs.
ER4 To achieve sustainable	CS17: + CS18: +	Medium and Long-term Indirect	Borough wide Waterfront	Policies CS17, CS18, and CS20 would encourage sustainable economic growth through their commitment to provide key infrastructure thus facilitating new business formation and meeting the needs of business through improved access. Big infrastructure projects such as the tidal flood barrier (CS18) may potentially help to diversify



SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
levels of prosperity and economic growth throughout the plan area	CS19: 0	Reversible Medium certainty		employment opportunities. In addition, town centre enhancements and enhanced pedestrian environment at the Waterfront may attract more visitors which will support the local economy. For these reasons effects have been assessed as positive.
	CS20: +			
ER5 To support vital and viable town, district and local centres	CS17: +	Medium and Long-term	Town and district centres	Delivering infrastructure and improved access to shops, services and facilities will be achieved through the implementation of Policies CS17 and CS20. There are clear commitments to provide better linkages between the Central Shopping area, the railway station and Waterfront and relieve congestion issues on key routes which will support the town economy and in particular the town centre.
	CS18: 0	Direct / Indirect		
	CS19: 0	Reversible		
	CS20: +	Medium certainty		
ER6 To encourage efficient patterns of movement in support of economic growth	CS17: +	Medium and Long-term	Town and district centres	Policies CS18 and CS20 seek to ensure that better linkages between key areas in Ipswich are provided. The SA Objective will be achieved through the Ipswich Major Scheme 'Travel Ipswich' and accessibility improvements between the Central Shopping area, Waterfront, and railway station. Public transport services will be improved through bus station provision, passenger information, and shuttle bus provision. The proposed improvements to the pedestrian network would reduce the impact of traffic on the economy and promote the use of sustainable travel modes. For these reasons effects from the implementation of Policy CS17 and CS20 have been assessed as positive.
	CS18: 0	Direct / Indirect		
	CS19: 0	Reversible		
	CS20: +	Medium certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ER7 To encourage and accommodate both indigenous and inward investment	CS17: +	Medium and Long-term Direct / Indirect Reversible	Borough wide	Policies CS17 and CS20 will contribute to the achievement of the SA Objective through the development of a high quality public realm and multi-functional green infrastructure in urban areas. The proposed environmental and accessibility improvements will enhance the reputation of town centre and suburb areas as places to work, live and visit. This may encourage inward investment therefore the effects are assessed as positive.
	CS18: 0			
	CS19: 0			
	CS20: +			
CL1 To maintain and improve access to education and skills for both young people and adults	CS17: +	Medium and Long-term Direct / Indirect Reversible Low certainty	Borough wide	The implementation of Policy CS17 has the potential to improve educational attainment through the strategic provision of new schools, however, a low certainty has been recorded as it is uncertain whether the overall educational attainment would be improved significantly as other factors also influence the level of skills and qualifications.
	CS18: 0			
	CS19: 0			
	CS20: 0			
CD1	CS17: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To minimise potential opportunities for crime and anti-social activity	CS18: 0			
	CS19: 0			
	CS20: 0			

## Appendix E

---

# Sustainability Appraisal Matrices – Development Management Policies

## Sustainable Development, Flooding and Sustainable Drainage

- Policy DM1: Sustainable Design and Construction
- Policy DM2: Decentralised Renewable or Low Carbon Energy
- Policy DM3: Provision of Private Outdoor Amenity Space in New and Existing Developments
- Policy DM4: Development and Flood Risk

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	DM1: +	Medium, Long-term Reversible Indirect Low certainty	Borough wide	The primary focus of Policy DM1 is not to reduce transport movements, however, within the BREEAM standard there is an accessibility index, which scores development on how accessible it is to various facilities via public transport. Therefore ensuring development is highly accessible by public transport over time may reduce vehicle movements and thus improve air quality – however, certainty is low.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ET2 To conserve soil resources and quality	DM1: +	Short, Medium, Long-term Reversible Direct / Indirect Medium / Low certainty	Borough wide	The primary focus of Policy DM1 is not to conserve soil quality and structure, however, the BREEAM and the Code for Sustainable Homes standards score higher for development that includes conversions rather than new build. This would represent a sustainable use of land resources. However, certainty is very low.  Policy DM3s commitment to providing outdoor amenity space in new and existing developments would benefit this SA Objective through .protecting soil structure and quality from development.
	DM2: 0			
	DM3: +			
	DM4: 0			
ET3 To reduce waste	DM1: +	Short, Medium, Long-term Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM1 states it will ensure new development meets various standards, including a minimum Code for Sustainable Homes Level 4 for residential development and a BREEAM 'Very Good' new build non-residential development. Therefore new development would be required to demonstrate it promotes waste reduction, incorporates sustainable building principles and leads to a decreased amount of waste going to landfill. In addition, the policy would ensure new development makes adequate provisions for recycling.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ET4 To reduce the effects of traffic upon the environment	DM1: +	Medium, Long-term Reversible Indirect Low certainty	Borough wide	The primary focus of Policy DM1 is not to reduce transport movements, however, within the BREEAM standard there is an accessibility index, which sores development on how accessible it is to various facilities via public transport. Therefore ensuring development is highly accessible by public transport over time may reduce vehicle movements and thus reduce the effects of transport on the environment – however, certainty is low.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ET5	DM1: +	Medium, Long-	Borough wide	Policy DM3 would improve access to open space over the

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To improve access to key services for all sectors of the population	DM2: 0	term		medium to long term through its commitment to ensuring new and existing developments provide adequate amenity space.  There is an accessibility index within the BREEAM standard, which scores development on how accessible it is to various facilities via public transport. Therefore ensuring development is highly accessible by public transport would benefit this SA objective.
	DM3: 0	Reversible		
	DM4: 0	Direct Medium certainty		
ET6 To limit and adapt to climate change	DM1: ++	Short, Medium, Long-term Reversible Direct High certainty	Borough wide	Policies DM1, DM2 and DM4 would all contribute to the fulfilment of this SA Objective. Policy DM1 states that sustainable design and construction methods would be applied to new development in the borough through requiring a minimum Level 4 Code For Sustainable homes and various BREEAM standards to be met. This would help to contribute to a reduction in greenhouse gas emissions, the demand for energy resources, increase energy efficiency and reduce CO <sub>2</sub> emissions.  Policy DM2 seeks to incorporate decentralised renewable and low carbon energy into new development which would reduce the demand for energy and increase energy efficiency along with increase the use of renewable energy.  Policy DM4 would benefit the SA objective through ensuring new development does not exacerbate current flooding in the borough along with providing SuDs measures where appropriate. The Policy also ensures water efficiency measures are maximised in new development.
	DM2: +			
	DM3: 0			
	DM4: +			
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM1: +	Short, Medium, Long-term Reversible Direct Medium certainty	Borough wide	Policy DM1 through its commitment to promoting sustainable design and construction (Code for Sustainable Homes and BREEAM) would ensure surface water run-off from new developments is managed through SuDs along with guarding against water pollution.  Policy DM4 would benefit the SA objective through ensuring new development does not exacerbate current flooding in the borough along with providing SuDs measures where appropriate. The Policy also ensures water efficiency measures are maximised in new development.
	DM2: 0			
	DM3: 0			
	DM4: ++			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM1: +	Short, Medium, Long-term Reversible Indirect Medium / Low certainty	Borough wide	Although not the primary focus of the policies. DM1 and DM3 would benefit the SA Objective through the provision of amenity space along with gardens in new residential development. Both of which would provide greater opportunities for wildlife. In addition, appropriate consideration of biodiversity can contribute to achieving Code for Sustainable homes standards for ecology, therefore Policy DM1's commitment to meeting a minimum of Level 4 may benefit the SA Objective.  Decentralised renewable and low carbon energy schemes (Policy DM2) have the potential to impact on biodiversity.
	DM2: ?			
	DM3: +			
	DM4: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				Particularly birds and bats with regards to wind turbines. As the location of such development is unknown, effects have been assessed as uncertain. It may even come from outside the borough. <i>It is recommended that the policy includes reference to the need for any new energy sources to be fully assessed for their effects on the natural and built environment and local amenity. Proposals should only be allowed where they do not incur significant effects.</i>
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM1: 0 DM2: ? DM3: 0 DM4: 0	N/A	N/A	Some decentralised renewable and low carbon energy schemes (Policy DM2) have the potential to impact on the setting of heritage assets. As the location of such development is unknown, effects have been assessed as uncertain. It may even come from outside the borough. <i>It is recommended that the policy includes reference to the need for any new energy sources to be fully assessed for their effects on the natural and built environment and local amenity. Proposals should only be allowed where they do not incur significant effects.</i>
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM1: 0 DM2: ? DM3: + DM4: 0	Short, Medium, Long-term Reversible Indirect Medium / Low certainty	Borough wide	Decentralised renewable and low carbon energy schemes (Policy DM2) have the potential to impact on the setting of landscape / townscape character and quality. Particularly wind turbines. As the location of such development is unknown, effects have been assessed as uncertain. It may even come from outside the borough. <i>It is recommended that the policy includes reference to the need for any new energy sources to be fully assessed for their effects on the natural and built environment and local amenity. Proposals should only be allowed where they do not incur significant effects.</i>  Under DM3 the provision of amenity space as part of new development including gardens would provide positive effects on townscape character / quality through urban greening.
HW1 To improve the health of those most in need	DM1: + DM2: 0 DM3: + DM4: +	Short, Medium, Long-term Reversible Direct Medium certainty	Borough wide	Policy DM1 would ensure new development was highly accessible to existing facilities, including health facilities, through its commitment to ensuring BREEAM standards are met. The Code for Sustainable homes would ensure daylighting in homes is maximised to benefit the health and wellbeing of residents.  The provision of amenity space within new and existing development that takes advantage of sunlight and daylight would benefit the health of occupants (Policy DM3).  In addition, a positive score has been recorded against Policy DM4 as reducing flood risk can have a beneficial effect on health and well-being.
HW2	DM1: 0	N/A	N/A	There is no clear relationship between the policies and the

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To improve the quality of life where people live and encourage community participation	DM2: 0 DM3: 0 DM4: 0			SA Objective.
ER1 To reduce poverty and social exclusion	DM1: 0 DM2: 0 DM3: 0 DM4: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM1: 0 DM2: 0 DM3: 0 DM4: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
ER3 To help meet the housing requirements for the whole community	DM1: + DM2: 0 DM3: 0 DM4: 0	Short, Medium, Long-term Reversible Indirect Medium / Low certainty	Borough wide	Although the focus of Policy DM1 is not to provide new homes, its commitment to ensuring new build residential development achieves a minimum Level 4 of the Code for Sustainable homes and conversions achieve a minimum BREEAM Domestic Refurbishment 'Very Good', may contribute to improving housing stock along with reducing high levels of living environment deprivation within the borough.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM1: 0 DM2: 0 DM3: 0 DM4: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
ER5 To support vital and viable	DM1: 0 DM2: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.



SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
town, district and local centres	DM3: 0			
	DM4: 0			
ER6 To encourage efficient patterns of movement in support of economic growth	DM1: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ER7 To encourage and accommodate both indigenous and inward investment	DM1: +	Medium, Long-term Reversible Indirect Low certainty	Borough wide	Policy DM1 supports the preservation and development of a high quality built environment through its commitment for new residential development to meet a minimum Level 4 Code for Sustainable Homes and various BREEAM standards. Policy DM4 seeks to ensure new development is adequately protected from flooding in accordance with adopted standards. Both of the above may help to encourage and accommodate both indigenous and inward investment as it would also show the borough as a responsible place to invest. However certainty for this is very low.
	DM2: 0			
	DM3: 0			
	DM4: +			
CL1 To maintain and improve access to education and skills for both young people and adults	DM1: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM2: 0			
	DM3: 0			
	DM4: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	DM1: 0	Short, Medium, Long-term Reversible Indirect Medium / Low certainty	Borough wide	Although the primary focus of Policy DM3 is to provide amenity space in new and existing development, its commitment to ensuring these areas are safe would benefit this SA Objective.
	DM2: 0			
	DM3: +			
	DM4: 0			

## Urban Design Policies and Protecting Our Assets

- Policy DM5: Design and Character
- Policy DM6: Tall Buildings
- Policy DM8: Heritage Assets and Conservation
- Policy DM9: Buildings of Townscape Interest
- Policy DM10: Protection of Trees and Hedgerows

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	DM5: +	Short, Medium, Long term Reversible Indirect Medium / Low certainty	Borough wide	Policies DM5 and DM10 would contribute to the improvement of air quality in Ipswich. Incorporation of sustainable, greener transport methods such as cycling and public transport into designs will be driven by Policy DM5. DM5 also seeks to integrate land use and community cohesion, reducing the need to travel; reducing traffic and improving air quality. Finally criterion h in Policy DM5 would ensure new buildings in or around AQMAs are designed in such a way that they minimise, or at the very least do not increase localised retention of pollutants.  Criterion e of Policy DM10 aims to encourage tree planting in Ipswich, to help achieve a target of 22% canopy cover by 2050. The policy also outlines that new development should integrate tree planting from the outset. Both of the above should increase tree cover in the area which in turn may help to improve air quality.
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: +			
ET2 To conserve soil resources and quality	DM5: 0	Short, Medium and Long term Reversible Indirect Low certainty	Borough wide	Policy DM10 aims to increase and protect tree coverage in the area. A consequence of protecting wooded areas and trees with TPOs is that they would safeguard natural areas and ensure soil is not degraded.
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: +			
ET3 To reduce waste	DM5: +	Short, Medium, Long Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM5 states it will assess the design quality for major residential development using the Building for Life 12 criteria (CABE at the Design Council / Design for Homes / HBF). Applicants would be expected to demonstrate that scheme designs can achieve a 'green' score in each category enabling schemes to be eligible for 'Building for Life Diamond' status. These building criteria promote waste reduction and sustainable building principles and should lead to decreased
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
				amounts of waste going to landfill. In addition, the policy would ensure the layout of new development makes adequate provision for the recycling of waste materials.
ET4 To reduce the effects of traffic upon the environment	DM5: <b>+</b>	Medium and Long term Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM5 states that in order to support Ipswich residents adopting sustainable lifestyles, the Council will make provisions for travel by cyclists and that layouts and designs provide a safe and useable public realm for all users – orientated towards sustainable transport modes. This over the medium to long term may help to reduce vehicle movements.
	DM6: <b>0</b>			
	DM8: <b>0</b>			
	DM9: <b>0</b>			
	DM10: <b>0</b>			
ET5 To improve access to key services for all sectors of the population	DM5: <b>0</b>	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM6: <b>0</b>			
	DM8: <b>0</b>			
	DM9: <b>0</b>			
	DM10: <b>0</b>			
ET6 To limit and adapt to climate change	DM5: <b>+</b>	Medium and Long term Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM5 includes a number of different measures concerned with climate change limitation and adaption. It contains a variety of different aims to promote urban greening within the area, in forms such as green walls and roofs, increased canopy cover and soft landscaping. The council plans that these measures will combat the effects of climate change through, for example, increased tree cover 'contributing to urban cooling through evapotranspiration and providing micro-climatic effects that can reduce energy demands in buildings'. The policy also puts forward proposals to increase facilities and improve infrastructure for sustainable transport forms, such as cycling and walking. This should increase the usage of such transport forms and lead to a resultant decrease in less sustainable transport use – principally cars.  Policy DM10 outlines proposals from the council to improve the tree coverage in the area. As stated above additional tree coverage has a number of benefits for mitigating the impacts of climate change.
	DM6: <b>0</b>			
	DM8: <b>0</b>			
	DM9: <b>0</b>			
	DM10: <b>+</b>			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM5: <b>+</b>	Medium and Long term	Borough wide	Policy DM5 contains proposals to increase urban greening in Ipswich. Part of the benefit of urban greening is that natural 'green' surfaces have slower run-off times for water compared to hard urban surfaces.
	DM6: <b>0</b>	Reversible		
	DM8: <b>0</b>	Indirect		
	DM9: <b>0</b>	Low certainty		
	DM10: <b>0</b>			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM5: <b>+</b>	Short, Medium and Long term	Borough wide	<p>Policy DM5 states that provisions such as bat and bird boxes and swift bricks would be supplied to enhance biodiversity. In addition, the policy also contains plans to increase urban greening in the area. This would increase tree cover across Ipswich's built up areas and provide sites for increased flora and fauna to thrive.</p> <p>Policy DM8 is principally focussed on protecting sites for the conservation of heritage assets and important archaeological areas.</p> <p>Policy DM10 is directly concerned with the protection and enhancement of woodland and hedgerows. This would be implemented through a variety of measures, such as: designating TPOs, encouraging tree planting to help achieve a target of 22% canopy cover, enforcing assessments of trees/hedgerows and when removal does occur replanting to be undertaken. Each of these measures would in some way contribute to the protection and enhancement of biodiversity in Ipswich. <i>The policy may benefit further through including a reference to the Hedgerow Regulations 1997 which protect 'important hedgerows' from being removed (uprooted or destroyed).</i></p>
	DM6: <b>0</b>	Reversible		
	DM8: <b>+</b>	Direct / Indirect		
	DM9: <b>0</b>	Medium / Low certainty		
	DM10: <b>++</b>			
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM5: <b>+</b>	Short, Medium and Long term	Borough wide	<p>The conservation and enhancement of heritage assets and sites of historical importance is the chief concern of Policy DM8. It lays out measures to protect listed buildings from alterations deemed detrimental, protection of conservation areas and areas of archaeological importance.</p> <p>Policies DM5, DM6 and DM9 would also all benefit the SA Objective through their commitment to retaining buildings of townscape interest, ensuring tall buildings do not have adverse effects on the setting of Conservation Areas and promoting high quality design, all of which would help to protect the historic character of the urban areas.</p>
	DM6: <b>+</b>	Reversible		
	DM8: <b>++</b>	Direct / Indirect		
	DM9: <b>+</b>	Medium certainty		
	DM10: <b>0</b>			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM5: +	Short, Medium and Long term Reversible Direct / Indirect Medium certainty	Borough wide	<p>The special character and distinctiveness of Ipswich is recognised by Policy DM5. The policy also outlines that new large scale residential developments would be built to a high standard and to the Building for Life 12 criteria.</p> <p>Policy DM6 has the potential to safeguard local distinctiveness and character in Ipswich by refusing applications for tall buildings deemed inappropriate and insensitive to the local area.</p> <p>Policy DM9 is directly concerned with the protection, retention and repair of buildings judged to be of local townscape interest, particularly those with no other statutory protection. If these buildings must be modified or lost then the replacement standard must be at least equal if not higher and incorporate sustainable features. This would only benefit local townscape character.</p> <p>Policy DM8 would benefit townscape character in particular through the policy's commitment to protecting conservation areas.</p> <p>Policy DM10 would benefit the SA Objective through its commitment to protecting urban greening – this would only benefit local townscape.</p>
	DM6: +			
	DM8: +			
	DM9: ++			
	DM10: +			
HW1 To improve the health of those most in need	DM5: +	Medium and Long term Reversible Indirect Medium certainty	Borough wide	<p>Promoting the integration of land uses into mixed developments and neighbourhoods is outlined within Policy DM5. This could lead to reduced need to travel and improved access to key local services such as GPs, dentists etc. The policy also outlines that new layouts and designs would be orientated towards accommodating cyclists and pedestrians. This could promote healthier and more sustainable forms of transport in Ipswich and help combat conditions such as obesity and its related health conditions.</p> <p>Although assessed as neutral, it is worth noting that the protection of trees and hedges along with promoting planting can have a small benefit to health and wellbeing.</p>
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: 0			
HW2 To improve the quality of life where people live and encourage community participation	DM5: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: 0			
ER1	DM5: 0	N/A	N/A	There is no clear relationship between the

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To reduce poverty and social exclusion	DM6: 0			policies and the SA Objective.
	DM8: 0			
	DM9: 0			
	DM10: 0			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM5: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: 0			
ER3 To help meet the housing requirements for the whole community	DM5: +	Medium and Long term Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM5 outlines that new residential development applications should meet the Building for Life 12 criteria. Moreover the policy sets out that applications for planning permission will be required to clearly demonstrate how submitted development proposals achieve urban design quality.
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM5: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: 0			
ER5 To support vital and viable town, district and local centres	DM5: +	Long term Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM5 outlines requirements for new development in the area to, wherever possible, 'integrate residential, working and community environments'. In doing so local vitality should be increased and the need to travel reduced. In doing this, access to shops, facilities and services should be improved in Ipswich.
	DM6: 0			
	DM8: 0			
	DM9: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	DM10: <b>0</b>			
ER6 To encourage efficient patterns of movement in support of economic growth	DM5: <b>+</b> DM6: <b>0</b> DM8: <b>0</b> DM9: <b>0</b> DM10: <b>0</b>	Short, Medium and Long Reversible Direct & Indirect Medium / Low certainty	Borough wide	Some provisions for improved facilities to accommodate sustainable transport are set out in Policy DM5. It outlines plans to increase the capacity to store bicycles and develop the network of sustainable transport infrastructure in the area. In turn, over the medium to long term this could reduce vehicle movements. In addition, the policy outlines plans to integrate land uses for new developments, such as has already been done on the Waterfront. This should result in a reduced need to travel and improve overall efficiency of the network.
ER7 To encourage and accommodate both indigenous and inward investment	DM5: <b>+</b> DM6: <b>+</b> DM8: <b>0</b> DM9: <b>+</b> DM10: <b>+</b>	Short, Medium and Long term Reversible Indirect Medium certainty	Borough wide	Policies DM5, DM6 and DM9 all include measures to encourage a high quality built environment. Policy DM9 stipulates that if buildings deemed important to the local townscape need to be replaced then a quality of building equal to or higher must be implemented. Policy DM6 states that any new tall buildings built in the area must be of the highest architectural quality, design and construction as well as contributing to public space and facilities. Lastly Policy DM5 states that any new major residential developments will be expected to meet the Building for Life 12 criteria. All of these measures would contribute to an enhanced built environment that make improve the attractiveness of the area to invest.  Additionally to this, Policies DM5 and DM10 encourage / protect urban greening in Ipswich and aim to improve urban areas with public art installations.
CL1 To maintain and improve access to education and skills for both young people and adults	DM5: <b>0</b> DM6: <b>0</b> DM8: <b>0</b> DM9: <b>0</b> DM10: <b>0</b>	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
CD1 To minimise potential opportunities for crime and	DM5: <b>+</b> DM6: <b>0</b> DM8: <b>0</b>	Short, Medium and Long term Reversible Direct / Indirect Medium certainty	Borough wide	Policy DM5 outlines plans to incorporate safety measures into design, through measures such as security lighting and CCTV. This should assist with the minimisation of crime and anti-social activity in the area. Over the long term this could help to reduce opportunities for crime in areas where

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
anti-social activity	DM9: 0			crime deprivation is high.
	DM10: 0			



## Small Scale Residential Development, Small Scale Infill and Backland Residential Development, Subdivision of Family Dwellings, Affordable Housing and the Density of Residential Development

- Policy DM12: Extensions to Dwellinghouses and the Provision of Ancillary Buildings
- Policy DM13: Small Scale Infill and Backland Residential Developments
- Policy DM14: The Sub-division of Family Dwellings
- Policy DM24: Affordable Housing
- Policy DM30: The Density of Residential Development

**Note: Principle and general location of new homes within the borough has been assessed within Policies CS2 and CS7. Therefore this assessment focusses on the details relating to the type and make up of new housing.**

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	DM12: 0	Medium and Long term	Ipswich town centre / very localised	Policies DM12 and DM13 would result in very minor localised development, however, this is very unlikely to affect to affect air quality to any significant degree.  Policy DM30 promotes higher density housing within the town centre, which over time would increase the population living in the area. In turn this is likely to worsen traffic and air quality over the long-term and may affect the town centre AQMAs. Conversely promoting lower density housing elsewhere would not increase traffic movements to the same degree. It is worth noting, mitigation to increase sustainable travel is provided in Policy CS5.  There is no link between the principles of sub dividing family homes (Policy DM14) and the provision of affordable homes (Policy DM24) and the SA Objective.
	DM13: 0	Reversible		
	DM14: 0	Indirect		
	DM24: 0	Medium / Low certainty		
	DM30: +/-			
ET2 To conserve soil resources and quality	DM12: 0	Short, Medium and Long term	Borough wide	It is unlikely that the Policies DM12 and DM24 would offer any significant effects to the SA Objective.  Policy DM13 may result in the loss of gardens which would not represent a suitable use of soil resources – however, due to the amount of development this policy is likely to lead to effects are unlikely to be significant.  Higher density development within the town centre means there would be a higher density on previously developed land which would be good for conserving soil resources. Conversely, lower density development outside the town centre and district centres would not represent the most sustainable use of soil resources.  A positive score has been recorded for DM14 as the sub-division of family homes is better for land
	DM13: 0	Reversible		
	DM14: +	Direct		
	DM24: 0	Medium certainty		
	DM30: +/-			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				resources than building additional homes.
ET3 To reduce waste	DM12: 0 DM13: 0 DM14: 0 DM24: 0 DM30: 0	N/A	N/A	It is unlikely that the Policies would offer any significant effects to the SA Objective. However, it is worth noting that Policies DM13 and DM14 ensure that sufficient refuse, recycling and garden waste container storage would be provided for small scale infill residential development and family dwellings that are sub divided.
ET4 To reduce the effects of traffic upon the environment	DM12: 0 DM13: 0 DM14: 0 DM24: 0 DM30: +/-	Medium and Long term Reversible Indirect Medium / Low certainty	Ipswich town centre / very localised	As per SA Objective ET1 'Air Quality' Policies DM12 and DM13 would result in very minor localised development, however, this is very unlikely to affect to affect traffic movements to any significant degree. Policy DM30 promotes higher density housing within the town centre, which over time would increase the population living in the area. In turn this is likely to worsen traffic over the long-term. Conversely promoting lower density housing elsewhere would not increase traffic movements to the same degree. It is worth noting, mitigation to increase sustainable travel is provided in Policy CS5.  There is no link between the principles of sub dividing family homes (Policy DM14) and the provision of affordable homes (Policy DM24) and the SA Objective.
ET5 To improve access to key services for all sectors of the population	DM12: 0 DM13: 0 DM14: 0 DM24: 0 DM30: +/-	Medium and Long term Reversible Indirect Medium / Low certainty	Borough wide	Effects have been recorded as positive and negative against Policy DM30 as higher density homes within the town centre would mean more homes are located within central areas which are close to amenities. However, this may not be true for lower density homes further away from the town centre.
ET6 To limit and adapt to climate change	DM12: 0 DM13: - DM14: 0 DM24: 0 DM30: +/-	Medium and Long term Reversible Indirect Medium / Low certainty	Ipswich town centre / very localised	As per SA Objective ET1 'Air Quality' Policies DM12 and DM13 would result in very minor localised development, however, this is very unlikely to affect to affect traffic movements to any significant degree. Policy DM30 promotes higher density housing within the town centre, which over time would increase the population living in the area. In turn this is likely to worsen traffic (and associated carbon emissions) over the long-term. Conversely promoting lower density housing elsewhere would not increase traffic

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				<p>movements to the same degree. It is worth noting, mitigation to increase sustainable travel is provided in Policy CS5.</p> <p>Infill development as per Policy DM13 may result in a loss of small permeable areas and contribute to urban flooding. Therefore there may be a requirement for SuDS. <i>However, this would be mitigated through Policy DM4.</i></p> <p>There is no link between the principles of sub dividing family homes (Policy DM14) and the provision of affordable homes (Policy DM24) and the SA Objective.</p>
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM12: 0 DM13: - DM14: 0 DM24: 0 DM30: -	Short, Medium and Long term Reversible Indirect Medium / Low certainty	Ipswich town centre / very localised	<p>High density residential development within the town centre (Policy DM30), where there are large areas within Flood Zones 2 and 3 may exacerbate existing flooding issues and may reduce the scope to incorporate open space and SuDs measures.</p> <p>There is no link between the principles of sub dividing family homes (Policy DM14) and the provision of affordable homes (Policy DM24) and the SA Objective.</p> <p>Infill development as per Policy DM13 may result in a loss of small permeable areas and contribute to urban flooding. Therefore there may be a requirement for SuDS. <i>However, this would be mitigated through Policy DM4.</i></p> <p>Policy DM12 would result in very small scale development which is unlikely to affect the SA Objective at this strategic level.</p>
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM12: 0 DM13: 0 DM14: 0 DM24: 0 DM30: -	Short, Medium and Long term Reversible Indirect Medium certainty	Borough wide	<p>Policy DM30 proposes high density development within the town centre which may affect the numerous county wildlife sites located there. However, it should be noted that there are more biodiverse areas outside the town centre where lower density development is proposed although the retention of gardens and space would be higher. Overall, effects are considered to be negative.</p> <p>Policy DM13 would result in a small-scale loss of urban greenspace which may affect biodiversity resources. <i>However, this would be mitigated through Policy CS4 and DM31.</i></p>
ET9 To conserve and where	DM12: 0 DM13: +	Short, Medium and Long term Reversible	Borough wide	<p>Policies DM13 and DM14 seek to protect the setting of existing buildings and ensure listed buildings / conservation areas are protected against</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
appropriate enhance areas and sites of historical importance	DM14: +	Indirect Medium certainty		<p>inappropriate infill residential development and the conversion of family homes. Both of which would benefit this SA Objective.</p> <p>Higher density residential development within the town centre (Policy DM30) may lead to greater adverse effects on the setting of heritage assets as there would be less scope to provide soft landscaping that includes green infrastructure -both of which may offer benefits to the setting of heritage assets.</p> <p>However, it is understood this is not the focus of Policy DM30, the protection of heritage assets is covered within Policies CS4 and DM8. Due to the level of uncertainty, an uncertain score has been recorded against the policy.</p>
	DM24: 0			
	DM30: ?			
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM12: +	Short, Medium and Long term	Borough wide	<p>Policies DM12, DM13 and DM14 commit to ensuring associated residential development does not have an overbearing impact on neighbouring amenity, result in an adverse visual impact on the immediate street scene or affect the character of listed buildings and conservation areas. Therefore effects have been assessed as positive.</p> <p>Policy DM24 would benefit the SA Objective through ensuring that affordable homes are designed to the same standard as market homes along with appearing the same as market homes.</p> <p>In central areas, higher density is expected and is a characteristic of the existing townscape (Policy DM30). Although it is still important to ensure appropriate public open space it is also good that density is lower in the greener suburban areas as that is also more appropriate to the existing character.</p>
	DM13: +	Reversible		
	DM14: +	Indirect		
	DM24: +	Medium certainty		
	DM30: +			
HW1 To improve the health of those most in need	DM12: 0	Medium and Long term	Borough wide	Policy DM24 relates to the design and integration of affordable homes which would offer health benefits.
	DM13: 0	Reversible		
	DM14: 0	Indirect		
	DM24: +	Low certainty		
	DM30: 0			
HW2 To improve the quality of life where people live and	DM12: +	Medium and Long term	Borough wide	Policies DM12, DM13 and DM14 all seek to ensure they do not lead to any adverse effects on neighbouring amenity therefore effects have been assessed as positive.
	DM13: +	Reversible		
	DM14: +	Indirect		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
encourage community participation	DM24: 0	Medium certainty		
	DM30: 0			
ER1 To reduce poverty and social exclusion	DM12: 0	N/A	N/A	The provision of affordable homes in Ipswich as outlined in Policy DM24 may contribute to reducing current high levels of living environment deprivation. Whilst sub-division is restricted in Policy DM14 unless appropriate, the creation of cheaper multiple occupancy dwellings is essential for some on low incomes.
	DM13: 0			
	DM14: +			
	DM24: +			
	DM30: 0			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM12: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: 0			
ER3 To help meet the housing requirements for the whole community	DM12: ++	Short, Medium and Long term Reversible Direct Medium certainty	Borough wide	Ensuring there is a mix of affordable (Policy DM24), high density, medium density and low density new homes (DM30) across Ipswich would help to meet the housing requirements for the whole community, through the provision of flats to large family homes. Some of which would be affordable.  Policies DM12, DM13 and DM14 are all related to meeting housing needs where appropriate, therefore effects have been recorded as positive.
	DM13: ++			
	DM14: ++			
	DM24: ++			
	DM30: ++			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM12: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: 0			
ER5 To support vital and viable	DM12: 0	Medium and Long term	Town and district centres	Ensuring there is a mix of affordable (Policy DM24), high density, medium density and low density new homes (DM30) across Ipswich would help to support
	DM13: 0	Reversible		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
town, district and local centres	DM14: 0	Indirect Medium certainty		the viability of the town and district centres. It is very unlikely that Policies DM12, DM13 or DM14 would lead to any significant effects on the SA Objectives due to the highly localised nature of development they would lead to.
	DM24: +			
	DM30: +			
ER6 To encourage efficient patterns of movement in support of economic growth	DM12: 0	Medium and Long term Reversible Indirect Medium certainty	Town centre	Higher density development within the town centre would ensure homes are close to amenities, jobs and transport hubs which would benefit this SA Objective.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: +			
ER7 To encourage and accommodate both indigenous and inward investment	DM12: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: 0			
CL1 To maintain and improve access to education and skills for both young people and adults	DM12: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	DM12: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM13: 0			
	DM14: 0			
	DM24: 0			
	DM30: 0			

## Transport and Access

- Policy DM17: Transport and Access in New Developments
- Policy DM18: Car and Cycle Parking

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	DM17: ++	Medium and Long-term	Borough wide	<p>Policy DM17 ensures that new development will not be permitted if it will lead to a significant adverse effect on air quality, in addition to ensuring sustainable transport access (walking, cycling and public transport) is an integral part of new development, this would benefit local air quality and the associated AQMAs.</p> <p>Limiting parking within the town centre as per Policy DM18 may benefit the AQMAs over the long term. In addition, the provision of cycle parking may encourage people to use their bike rather than their car. Both of which would benefit air quality.</p>
	DM18: +	Direct / Indirect Reversible Medium Certainty		
ET2 To conserve soil resources and quality	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ET3 To reduce waste	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ET4 To reduce the effects of traffic upon the environment	DM17: ++	Medium and Long-term	Borough wide	<p>Policy DM17 ensures that new development will not be permitted if it will lead to a significant adverse effect on air quality (i.e. from transport), in addition ensuring sustainable transport access (walking, cycling and public transport) is an integral part of new development would reduce the effects of traffic upon the environment.</p> <p>Limiting parking within the town centre as per Policy DM18 and providing cycle parking may encourage people to use their bike rather than their car over the long term. Both of which would benefit this SA Objective.</p>
	DM18: +	Direct / Indirect Reversible Medium Certainty		
ET5 To improve access to key services for all sectors of the	DM17: +	Short, Medium and Long-term	Borough wide	The Policies commit to ensuring new development supports the use of sustainable modes of transport through a requirement to facilitate improved accessibility along with ensuring there is adequate cycle and parking provision across the borough. This would contribute to ensuring new development
	DM18: +	Direct Reversible Medium Certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
population				maintains / improves access to essential services and facilities.
ET6 To limit and adapt to climate change	DM17: +	Medium and Long-term	Borough wide	Policy DM17 ensures that new development will not be permitted if it will lead to a significant adverse effect on pollution (i.e. carbon emissions), in addition ensuring sustainable transport access (walking, cycling and public transport) is an integral part of new development would reduce carbon emissions from transport over the medium to long term.  Limiting parking within the town centre as per Policy DM18 along with providing cycle parking may encourage people to use their bike rather than their car. Both of which would benefit this SA Objective.
	DM18: +	Direct / Indirect Reversible Medium Certainty		
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ET10	DM17: 0	Short, Medium and	Borough wide	Although protecting landscape / townscape is not the



SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM18: +	Long-term Indirect Reversible Medium Certainty		focus of the policy, DM18's commitment to ensuring car and cycle parking is fully integrated into the design of new schemes to create an attractive environment along with ensuring provisions do not dominate the local street scene would provide minor positive effects on the SA Objective.
HW1 To improve the health of those most in need	DM17: +	Medium and Long-term	Borough wide	Policy DM17 seeks to ensure the promotion of sustainable modes of transport (i.e. walking, cycling or using public transport) is integral to the design of new development. The promotion of sustainable transport may contribute to encouraging healthy lifestyles and reducing vehicle emissions – this can have positive health effects in the long term.  The provision of cycle parking as per Policy DM18 would also benefit this SA Objective through potentially encouraging people to cycle.
	DM18: +	Direct / Indirect Reversible Low certainty		
HW2 To improve the quality of life where people live and encourage community participation	DM17: +	Medium and Long-term	Borough wide	Walking and cycling as promoted and encouraged within the policies are good for quality of life.
	DM18: +	Direct / Indirect Reversible Low certainty		
ER1 To reduce poverty and social exclusion	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM18: 0			
ER3	DM17: 0	N/A	N/A	There is no clear link between the policies and the SA

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To help meet the housing requirements for the whole community	DM18: 0			Objective.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM17: 0 DM18: 0	N/A	N/A	Although effects have been assessed as neutral against the SA Objective, ensuring new development incorporates sustainable access into the design may contribute to ensuring transport infrastructure meets the needs of business. However, certainty for this is very low.
ER5 To support vital and viable town, district and local centres	DM17: + DM18: +	Short, Medium and Long-term Indirect Reversible Low Certainty	Local, district and the town centre	The Policies commit to ensuring new development supports the use of sustainable modes of transport through a requirement to facilitate improved accessibility along with ensuring there is adequate cycle and parking provision across the borough. This would contribute to ensuring new development maintains / improves access to essential services and facilities – most of which are located within the boroughs town centre, local and district centres, therefore this may have positive effects on the SA Objective.
ER6 To encourage efficient patterns of movement in support of economic growth	DM17: + DM18: +	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	Policies DM17 and DM18 would benefit the SA Objective as they would contribute to ensuring new development meets people's transport infrastructure needs (including walking and cycling) along with ensuring new development is within 400m of public transport provision. This would promote the use of sustainable travel modes and may reduce dependence on the private car over the medium to long term. All of the above would encourage efficient patterns of movement to support economic growth.
ER7 To encourage and accommodate both indigenous and inward investment	DM17: + DM18: +	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	Ensuring sites are accessible with sufficient car parking and cycle parking may make Ipswich a more attractive place people want to invest in.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
CL1 To maintain and improve access to education and skills for both young people and adults	DM17: 0	N/A	N/A	It is unlikely the policies would have any significant effects on the SA Objective.
	DM18: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	DM17: 0	Short, Medium and Long-term Indirect Reversible Medium certainty	Borough wide	Policy DM18 ensures that parking and cycling provision is secure and safe. This may reduce the risk of opportunistic crimes.
	DM18: +			

## Proposals in Retail Areas

- Policy DM20: The Central Shopping Area
- Policy DM21: District and Local Centres
- Policy DM22: Town Centre Uses Outside the Central Shopping Area
- Policy DM23: Retail Proposals Outside Defined Centres

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	DM20: 0	Medium and Long-term Indirect Reversible Medium / Low Certainty	Defined centres	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET2 To conserve soil resources and quality	DM20: 0	N/A	N/A	It is unlikely that Policies DM20, DM21, DM22 and DM23 would have any significant effects on the SA Objective as they simply state the type of use that will be permitted within defined boundaries and seek to restrict this type of development elsewhere.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET3 To reduce waste	DM20: 0	N/A	N/A	The proposed retail units would produce waste. However, this would also be true for other similar retail activity focussed in those areas. Therefore effects have been assessed as neutral.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET4 To reduce the effects of traffic upon the environment	DM20: 0	Medium and Long-term Indirect Reversible Medium Certainty	Outside defined centres	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use and restrict this type of use elsewhere. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET5 To improve access to key services for all sectors of the population	DM20: +	Short, Medium and Long-term Indirect Reversible Medium / Low Certainty	Borough wide	Policies DM20 and DM22 both seek to locate appropriate retail and community facilities within existing commercial areas that are highly accessible. Therefore effects have been assessed as positive.  Policy DM21 would result in a new district centre and two new local centres along with town centre use development outside defined areas all of which may improve the accessibility to essential services for those that live away from existing commercial areas.
	DM21: +			
	DM22: +			
	DM23: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				In addition Policy DM23 seeks to restrict retail outside accessible centres where possible therefore would provide further beneficial effects.
ET6 To limit and adapt to climate change	DM20: 0	Medium and Long-term	Outside defined centres	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use and restrict this type of development elsewhere. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
	DM21: 0	Indirect		
	DM22: 0	Reversible		
	DM23: 0	Medium Certainty		
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM20: 0	N/A	N/A	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM20: 0	N/A	N/A	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use and restrict this type of development elsewhere. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM20: 0	N/A	N/A	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use and restrict this type of development elsewhere. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ET10 To conserve and enhance the quality and local	DM20: 0	N/A	N/A	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use and restrict this type of development elsewhere. The location of these retail areas is already assessed in the spatial strategy so
	DM21: 0			
	DM22: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
distinctiveness of landscapes and townscapes	DM23: 0			the type of retail is unlikely to affect this objective.
HW1 To improve the health of those most in need	DM20: 0	N/A	N/A	Policies DM20, DM21, DM22 and DM23 all seek to focus appropriate retail activity within areas defined for retail/centre use and restrict this type of development elsewhere. The location of these retail areas is already assessed in the spatial strategy so the type of retail is unlikely to affect this objective.  Policy DM22 may contribute to promoting healthy lifestyles though its support for leisure and recreation uses, which would be focused outside the central shopping area but within the town centre.
	DM21: 0			
	DM22: +			
	DM23: 0			
HW2 To improve the quality of life where people live and encourage community participation	DM20: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ER1 To reduce poverty and social exclusion	DM20: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM20: +	Short, Medium and Long-term	Borough wide	Retail units within the accessible central shopping area (Policy DM20) along with the provision of local shops in accessible district and local centres (Policy DM21) may contribute over the medium to long term to reducing unemployment in areas most at need (there is currently high levels of employment and income deprivation within the town centre). The selection of appropriate retail types is an important component of this.  Policy DM22s commitment to facilitating the development of leisure, recreation, culture and tourism use development within accessible the town centre again would benefit this SA Objective through providing job opportunities.  Policy DM23 would also benefit the SA Objective
	DM21: +	Direct		
	DM22: +	Reversible		
	DM23: +	Medium Certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				through supporting existing centres, which may also support existing jobs in these centres.
ER3 To help meet the housing requirements for the whole community	DM20: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
	DM21: 0			
	DM22: 0			
	DM23: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM20: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	The policies would encourage economic growth through their commitment to encouraging retail and community facilities. Specifically Policy DM22 may also help to diversify the job offer in Ipswich though promoting leisure, recreation, culture and tourism development within the town centre.
	DM21: +			
	DM22: +			
	DM23: +			
ER5 To support vital and viable town, district and local centres	DM20: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Town, district and local centres	Policies DM20, DM21, DM22 and DM23 all directly seek to support this SA Objective through focussing appropriate retail and commercial development within defined boundaries and deterring inappropriate use classes. This would not only support the viability of town, district and local centres but also improve the offer of retail and facilities within these areas.
	DM21: +			
	DM22: +			
	DM23: +			
ER6 To encourage efficient patterns of movement in support of economic growth	DM20: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide	Focussing retail and commercial development within defined and accessible locations as per Policies DM20, DM21, DM22 and DM23 would benefit this SA Objective, through potentially creating 'one stop shop' areas. The selection of appropriate retail types is an important component of this.
	DM21: +			
	DM22: +			
	DM23: +			
ER7 To encourage and accommodate both indigenous and inward	DM20: +	N/A	N/A	Policies DM20, DM21, DM22 and DM23 all directly seek to support this SA Objective through focussing appropriate retail and commercial development within defined boundaries and deterring inappropriate use classes. This should help to attract appropriate types of balanced investment. Development outside these areas would only be permitted where appropriate.
	DM21: +			
	DM22: +			
	DM23: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
investment				
CL1 To maintain and improve access to education and skills for both young people and adults	DM20: 0 DM21: 0 DM22: 0 DM23: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
CD1 To minimise potential opportunities for crime and anti-social activity	DM20: 0 DM21: 0 DM22: 0 DM23: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.



## Employment Land

- Policy DM25: Protection of Employment Land

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	DM25: +/-	Medium and Long-term Indirect Reversible Low Certainty	Borough wide	Policy DM25 seeks to safeguard employment areas within the borough which over the medium to long term may increase the number of job opportunities within those areas. In turn this may lead to an increase in vehicle movements related to people accessing employment and may negatively impact air quality and the AQMAs. However, the clustering of employment areas within accessible locations may indirectly encourage people to access employment via sustainable modes of transport, which would benefit this SA Objective. NB It is understood that promoting sustainable travel is not the focus of this policy, this is covered elsewhere within the Core Strategy i.e. Policy CS5 and DM17.
ET2 To conserve soil resources and quality	DM25: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Employment areas	This policy would have positive effects by protecting existing land allocated for employment use and therefore potentially reduce demand for greenfield sites for employment use elsewhere in the borough. Conversely, employment areas within urban Ipswich located on previously developed land would protect soil resources and may result in remediation of contaminated sites if development is proposed. Effects have therefore been assessed as positive.
ET3 To reduce waste	DM25: -	Medium and Long-term Indirect Reversible Low Certainty	Borough wide	Policy DM25 seeks to safeguard employment areas which over the medium to long term may increase the number of people working in the borough. This could therefore increase the amount of waste produced per capita. NB It is understood that reducing waste is not the focus of this policy, this is covered elsewhere within the Core Strategy i.e. Policy CS4. It should also be noted that by retaining clusters of employment uses there may be benefits to be gained through facilitating recycling e.g. easier collections.
ET4 To reduce the effects of traffic upon the environment	DM25: +/-	Medium and Long-term Indirect Reversible Low Certainty	Borough wide	Policy DM25 seeks to safeguard employment areas within the borough which over the medium to long term may increase the number people working in the borough. In turn this may lead to an increase in vehicle movements related to people accessing employment. However, the clustering of employment areas within accessible locations may indirectly encourage people to access employment via sustainable modes of transport, which would benefit this SA Objective. NB It is understood that promoting

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				sustainable travel is not the focus of this policy, this is covered elsewhere within the Core Strategy i.e. Policy CS5.
ET5 To improve access to key services for all sectors of the population	DM25: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
ET6 To limit and adapt to climate change	DM25: +/-	Medium and Long-term Indirect Reversible Low Certainty	Borough wide	Policy DM25 seeks to safeguard employment areas within the borough which over the medium to long term may increase the number people working in the borough. In turn this may lead to an increase in vehicle movements (and carbon emissions) related to people accessing employment. However, the clustering of employment areas within accessible locations may indirectly encourage people to access employment via sustainable modes of transport, which would benefit this SA Objective. NB It is understood that promoting sustainable travel is not the focus of this policy, this is covered elsewhere within the Core Strategy i.e. Policy CS5.
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM25: -	Short, Medium and Long-term Direct Reversible Medium Certainty	IP One area	The focus of this policy is not to reduce and manage flooding and protect water quality, this is covered within Policy DM4. However, it should be noted there are employment areas within the IP One area located within Flood Zones 2 and 3. <i>In addition, any effects on water quality/pollution could be mitigated using standard, accepted mechanisms such as the Environment Agency's Pollution Prevention Guidelines.</i>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM25: +	Short, Medium and Long-term Direct Reversible Low Certainty	Employment areas	The focus of this policy is not to conserve and enhance biodiversity and geodiversity, this is provided within Policies CS4 and DM31. However, it should be noted that protecting existing employment areas may reduce demand for future greenfield employment development.
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM25: +	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	The focus of this policy is not to conserve and enhance heritage assets, this is provided in Policies CS4 and DM8. However, it should be noted that the policy may indirectly protect heritage assets elsewhere in the borough through potentially reducing future demand for employment development in more greenfield locations.
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM25: +	Short, Medium and Long-term Direct Reversible Low Certainty	Borough wide	The focus of this policy is not to conserve and enhance townscape / landscape character and quality, this is provided in Policy CS4 and a variety of DM policies. However, it should be noted that the policy may indirectly protect the landscape and townscape elsewhere in the borough through potentially reducing future demand for employment development in more greenfield locations. .
HW1 To improve the health of those most in need	DM25: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
HW2 To improve the quality of life where people live and encourage community participation	DM25: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ER1 To reduce poverty and social exclusion	DM25: +	Medium and Long-term Direct Reversible Medium / Low Certainty	Areas with high levels of employment and income deprivation	There are areas within the town centre which currently have high levels of employment deprivation and income deprivation. Therefore, the safeguarding of employment areas within the town centre may offer opportunities for new jobs over the medium to long term.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM25: ++	Short, Medium and Long-term Direct Reversible High Certainty	Borough wide	The policy directly supports the SA Objective as it seeks to safeguard employment areas within accessible locations across Ipswich. Over the long term development within the employment allocations may contribute to a reduction in unemployment in the areas most at need – employment and income deprivation is currently high within the IP One area.
ER3 To help meet the housing requirements for the whole community	DM25: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM25: ++	Short, Medium and Long-term Direct Reversible High Certainty	Borough wide	The Policy safeguards land within Ipswich for employment development. This would help to encourage new business formation along with helping to increase and diversify employment opportunities.  The location of employment areas within clusters and accessible locations along with providing a choice / variety of areas may prove attractive to new businesses and may support economic growth.
ER5 To support vital and viable town, district and local centres	DM25: +	Short, Medium and Long-term Direct Reversible High Certainty	Town centre and District and local centres	The Policy seeks to safeguard employment areas for businesses to locate within the town centre, district and local centres. This would help to support vital and viable town, district and local centres.
ER6 To encourage efficient patterns of movement in support of economic growth	DM25: +/-	Medium and Long-term Indirect Reversible Low Certainty	Borough wide	The Policy safeguards allocated and existing employment land within Ipswich. This would help ensure there is sufficient land, buildings and premises available to accommodate business start-up and growth across Ipswich.  Ultimately the policy may increase the number people working in the borough which may increase in vehicle movements, this may have an adverse effect on the current transport network. However, the clustering of employment areas within accessible locations may

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				indirectly encourage people to access employment via sustainable modes of transport, which would benefit this SA Objective.
ER7 To encourage and accommodate both indigenous and inward investment	DM25: ++	Short, Medium and Long-term Indirect Reversible Low Certainty	Borough wide	The Policy safeguards employment areas across the borough largely within accessible locations. Choice and accessibility may prove attractive and could facilitate regeneration which could encourage both indigenous and inward investment.
CL1 To maintain and improve access to education and skills for both young people and adults	DM25: 0	N/A	N/A	Although effects have been assessed as neutral, the Policy would ultimately result in an increased employment offer in the borough. This may increase the number of apprenticeships available in the borough which would offer benefits to this SA Objective. However, this link could be considered tenuous.
CD1 To minimise potential opportunities for crime and anti-social activity	DM25: 0	N/A	N/A	There is no clear link between the policy and the SA Objective.

## Amenity, Open Space, Sport and Recreation and Community Facilities

- Policy DM26: Protection of Amenity
- Policy DM27: Non-residential Uses in Residential Areas
- Policy DM28: Protection of Open Spaces, Sport and Recreation Facilities
- Policy DM29: Provision of New Open Spaces, Sport and Recreation Facilities
- Policy DM32: Protection and Provision of Community Facilities

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET1 To improve air quality	DM26: <b>+</b>	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	It is unlikely the policies would significantly affect any of the SA Objectives. However, Policy DM26 states new development that could produce harmful effects e.g. air pollution will be directed to locations where they would minimise harm to the environment which may offer very minor benefits to the SA Objective.
	DM27: <b>0</b>			
	DM28: <b>0</b>			
	DM29: <b>0</b>			
	DM32: <b>0</b>			
ET2 To conserve soil resources and quality	DM26: <b>0</b>	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	Policies DM28 and DM29 seek to protect existing areas of open space within Ipswich together with providing new areas of open space as part of new development. This would help to maintain and enhance soil quality where possible, as such effects have been recorded as positive.
	DM27: <b>0</b>			
	DM28: <b>+</b>			
	DM29: <b>+</b>			
	DM32: <b>0</b>			
ET3 To reduce waste	DM26: <b>0</b>	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM27: <b>0</b>			
	DM28: <b>0</b>			
	DM29: <b>0</b>			
	DM32: <b>0</b>			
ET4 To reduce the effects of traffic upon the environment	DM26: <b>0</b>	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM27: <b>0</b>			
	DM28: <b>0</b>			
	DM29: <b>0</b>			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	DM32: <b>0</b>			
ET5 To improve access to key services for all sectors of the population	DM26: <b>0</b> DM27: <b>0</b> DM28: <b>+</b> DM29: <b>+</b> DM32: <b>+</b>	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	Policies DM28, DM29 and DM32 would benefit this SA Objective though their commitment to protecting existing areas of open space together with creating new areas within new development. This would therefore increase the offer within Ipswich. In addition, Policy DM32 specifically ensures a range of community facilities are available and meet local need within the borough.
ET6 To limit and adapt to climate change	DM26: <b>0</b> DM27: <b>0</b> DM28: <b>+</b> DM29: <b>+</b> DM32: <b>0</b>	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	Green areas of open space can act as natural flood storage and attenuation. Therefore positive effects have been recorded against policies DM28 and DM29.
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM26: <b>0</b> DM27: <b>0</b> DM28: <b>+</b> DM29: <b>+</b> DM32: <b>0</b>	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	As above.
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM26: <b>0</b> DM27: <b>0</b> DM28: <b>+</b> DM29: <b>+</b> DM32: <b>0</b>	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	Ensuring areas of open space are safeguarded and new areas created within new development would offer opportunities for habitat creation and enhancement. It may also provide opportunities for people to access wildlife and open green spaces. Effects have therefore been assessed as positive against Policies DM28 and DM29.
ET9	DM26: <b>0</b>	Short, Medium and	Residential	Policy DM27 ensures that the scale and massing of

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To conserve and where appropriate enhance areas and sites of historical importance	DM27: +	Long-term Indirect Reversible Low Certainty	areas	non-residential use development in residential areas is compatible with the surrounding area – this may indirectly benefit the historic landscape.
	DM28: 0			
	DM29: 0			
	DM32: 0			
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM26: 0	Short, Medium and Long-term Indirect Reversible Medium Certainty	Borough wide	Policy DM27 ensures that the scale and massing of non-residential use development in residential areas is compatible with the surrounding area – this may indirectly benefit the landscape / townscape character and quality.  The protection of existing open space and the provision of new open space as part of new development would contribute to urban greening and benefit this SA Objective.
	DM27: +			
	DM28: +			
	DM29: +			
	DM32: 0			
HW1 To improve the health of those most in need	DM26: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	Ensuring noisy polluting activities as per Policy DM27 are not located by housing would benefit both mental physical health.  Safeguarding the provision of community facilities and providing new facilities to meet local need (Policy DM32) would benefit this SA Objective through ensuring health and social care provision is adequate.  In addition Policies DM28 and DM29 would benefit the SA Objective through safeguarding existing areas of open space and providing new opportunities for sport and recreation in new development. This would contribute to promoting healthy lifestyles across the borough.
	DM27: +			
	DM28: +			
	DM29: +			
	DM32: +			
HW2 To improve the quality of life where people live and encourage community participation	DM26: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide	Policies DM26 and DM27 seek to guard against adverse effects on amenity resulting from new development. It seeks to do this by refusing development that would cause a material nuisance (i.e. through noise, light pollution etc.) and where it would be detrimental to human health. Therefore effects have been assessed as positive.  The safeguarding of existing open space and provision of new open space may increase opportunities for community participation – albeit with a low certainty. However, effects have been assessed as positive against Policies DM28 and DM29.
	DM27: +			
	DM28: +			
	DM29: +			
	DM32: +			



SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
				The protection and provision of community facilities would encourage community participation, therefore effects have been assessed as positive against Policy DM32.
ER1 To reduce poverty and social exclusion	DM26: 0	Medium and Long-term Indirect Reversible Medium / Low Certainty	Borough wide	The protection and provision of community facilities as outlined in Policy DM32 may have indirect positive effects on reducing social exclusion.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: +			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM26: 0	N/A	N/A	It is unlikely the policies would affect the SA Objectives to any significant degree. However, the protection and provision of community facilities to meet local need (Policy DM32) may offer some new employment opportunities within the borough – albeit a small number.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			
ER3 To help meet the housing requirements for the whole community	DM26: 0	N/A	N/A	It is unlikely the policies would affect the SA Objectives to any significant degree.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM26: 0	N/A	N/A	It is unlikely the policies would affect the SA Objectives to any significant degree.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			
ER5	DM26: +	Short, Medium and	District and	The protection and provision of community facilities to

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To support vital and viable town, district and local centres	DM27: 0	Long-term Indirect Reversible Medium / Low Certainty	local centres	meet local need (Policy DM32) may offer some benefits to the SA Objective, through contributing to ensuring district and local centres are viable. In addition, the protection and provision of open space and protection amenity would also all benefit this SA Objective.
	DM28: +			
	DM29: +			
	DM32: +			
ER6 To encourage efficient patterns of movement in support of economic growth	DM26: 0	N/A	N/A	It is unlikely the policies would affect the SA Objectives to any significant degree.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			
ER7 To encourage and accommodate both indigenous and inward investment	DM26: 0	Long-term Direct Reversible Low Certainty	Borough wide	Policies DM28 and DM29 would contribute to the achievement of this SA Objective through safeguarding and providing areas of open space in the borough. This could create multi-functional green infrastructure in urban areas which over the long term could make the borough a more visually attractive place to invest.
	DM27: 0			
	DM28: +			
	DM29: +			
	DM32: 0			
CL1 To maintain and improve access to education and skills for both young people and adults	DM26: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	DM26: 0	N/A	N/A	It is unlikely the policies would affect the SA Objectives to any significant degree.
	DM27: 0			
	DM28: 0			
	DM29: 0			
	DM32: 0			

## The Natural Environment

- Policy DM31: The Natural Environment
- Policy DM33: Green Corridors
- Policy DM34: Countryside

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ET1 To improve air quality	DM31: 0	N/A	N/A	Policies DM33 and DM31 seek to establish and enhance green corridors and ecological networks across the borough. Therefore the policy may make partial contributions to improving air quality - the provision of tree and vegetation planting would enable vegetation to improve air quality through the removal of carbon dioxide in the air. Policy DM34 states that development would only be permitted in the countryside where it contributes to strategic walking and cycling routes. Over the medium to long term this may offer some benefits to air quality though reducing vehicle movements. Overall however, effects on this SA Objective are likely to be negligible.
	DM33: 0			
	DM34: 0			
ET2 To conserve soil resources and quality	DM31: +	Short, Medium and Long-term Direct / Indirect Reversible Medium Certainty	Ipswich Green Corridors and ecological networks along with the countryside.	Policy DM31 and DM33 seek to establish and enhance green corridors and ecological networks within the borough which would protect soil resources.  Policy DM34's commitment to guarding against inappropriate development within the countryside and retaining the best and most versatile agricultural land would contribute to the protection of the boroughs soil resource.
	DM33: +			
	DM34: +			
ET3 To reduce waste	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			
	DM34: 0			
ET4 To reduce the effects of traffic upon the environment	DM31: 0	N/A	N/A	Policy DM34 states that development would only be permitted in the countryside where it contributes to strategic walking and cycling routes. Over the medium to long term this may offer some benefits to reducing vehicle movements. However, this is not likely to be significant, therefore effects have been assessed as negligible.
	DM33: 0			
	DM34: 0			
ET5 To improve access to key services for all sectors of the population	DM31: 0	Short, Medium and Long-term Direct / Indirect Reversible Medium Certainty	Ipswich Green Corridors and ecological networks along with the countryside.	The establishment and enhancement of green corridors and ecological networks as outlined within Policies DM31 and DM33 could increase connectivity and accessibility to key services within the borough. Policy DM33 in particular seeks to provide green corridors with recreational, amenity and transport
	DM33: +			
	DM34: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				functions. Policy DM34 promotes the recreational use of land that retains the open character of the countryside along with ensuring new development contributes to strategic walking and cycling routes which may improve access to areas of opens space for residents to enjoy.
ET6 To limit and adapt to climate change	DM31: 0 DM33: + DM34: 0	N/A	N/A	Policies DM33 and DM31 seek to establish and enhance green corridors and ecological networks across the borough. Therefore the policy may make partial contributions to reducing carbon emissions - the provision of tree and vegetation planting would also enable vegetation to help to minimise climate change through the removal of carbon dioxide in the air. All of which would benefit biodiversity. Policy DM34 states that development would only be permitted in the countryside where it contributes to strategic walking and cycling routes. Over the medium to long term this may offer some benefits to climate change though reducing vehicle movements. Overall however, effects on this SA Objective are likely to be negligible.
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM31: + DM33: + DM34: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	Policy DM31 seeks to protect the Stour and Orwell Estuaries SSSI, SPA and Ramsar site which would contribute to this SA Objective. In addition, the creation of an ecological network and green corridors and protection of countryside across Ipswich would create areas that may benefit flood storage under all three policies.
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM31: ++ DM33: ++ DM34: +	Short, Medium and Long-term Direct Reversible High Certainty	Borough wide	Policy DM31 commits to protecting and enhancing biodiversity across the borough, from Europeans sites and SSSIs to County Wildlife Sites, Local Wildlife Sites and sites important for their geodiversity. It also makes specific provision for the protection of European sites that mirrors the Habitats Directive. In addition, the Policy seeks to establish an ecological network across the borough which would only benefit local wildlife along with help to facilitate movement throughout Ipswich. For these reasons effects have been assessed as major positive. <i>That said, the policy could be strengthened through making reference to 'alone or in-combination with other proposals'.</i>  Policy DM33 supports the SA Objective as it seeks to establish and enhance green corridors within Ipswich which would provide vital connections between

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				habitats for use by wildlife. Policy DM34 seeks to protect the countryside and retain its character. The countryside around Ipswich urban area provides an attractive setting for the town and links into its ecological and green networks. Under this Policy, the Suffolk Coast and Heaths AONB, would be protected – planning permission would only be granted for development that sought to conserve the landscape and scenic beauty of the AONB and contributed to the green rim / wildlife corridors across the borough.
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM31: 0 DM33: 0 DM34: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM31: + DM33: + DM34: ++	Short, Medium and Long-term Direct / Indirect Reversible High Certainty	Borough wide	Policy DM31 seeks to establish and enhance the borough's ecological network through encouraging development to provide net biodiversity gains commensurate with the scale of the proposal, through measures such as retaining existing habitat features, tree planting, habitat restoration or re-creation and comprehensive landscaping, which is appropriate to local wildlife. All of which would serve not only to enhance biodiversity but contribute to enhancing landscapes and townscapes within Ipswich. Policy DM33 seeks to establish attractive green corridors that contribute to improving the public realm and character of the borough. Within defined green corridors, only development that maintains / enhances the corridor's amenity and function would be permitted. This would contribute to enhancing landscape and local distinctiveness within the borough. Policy DM34 seeks to retain the character of the countryside which would help to conserve the local distinctiveness of the local landscape and townscape. One of the principles of planning set out in the NPPF is that it should recognise the intrinsic character and beauty of the countryside – this is reflected within the Policy through discouraging development that does not respect the character of the countryside.
HW1	DM31: +	Short, Medium and	Borough wide	Policies DM31, DM33 and DM34 may contribute

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To improve the health of those most in need	DM33: ++	Long-term Indirect Reversible Low Certainty		towards the SA Objective. The establishment of attractive green corridors and ecological networks that connect the borough along with improving links to open spaces / the countryside may encourage people to walk / cycle which in turn may encourage healthy lifestyle choices along with benefitting mental wellbeing.
	DM34: +			
HW2 To improve the quality of life where people live and encourage community participation	DM31: +	Short, Medium and Long-term Indirect Reversible Low Certainty	Borough wide	As above the establishment of attractive green corridors and ecological networks that connect the borough along with improving links to open spaces / the countryside may offer health benefits to those living in Ipswich – albeit a low certainty.
	DM33: +			
	DM34: +			
ER1 To reduce poverty and social exclusion	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			
	DM34: 0			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			
	DM34: 0			
ER3 To help meet the housing requirements for the whole community	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			
	DM34: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM31: 0	Short, Medium and Long-term Direct Reversible Low Certainty	Countryside	Policy DM34 may help to increase and diversify employment opportunities within the countryside as it states development would be permitted where it is necessary to support a sustainable rural business including tourism.
	DM33: 0			
	DM34: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ER5 To support vital and viable town, district and local centres	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			
	DM34: 0			
ER6 To encourage efficient patterns of movement in support of economic growth	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			
	DM34: 0			
ER7 To encourage and accommodate both indigenous and inward investment	DM31: +	Short, Medium and Long-term	Borough wide	Policies DM31 and DM33 both seek to promote the development of multi-functional green infrastructure in urban areas. This would offer benefits to this SA Objective through contributing to making urban Ipswich an attractive place people may want to invest in.
	DM33: +	Direct		
	DM34: 0	Reversible Medium / Low Certainty		
CL1 To maintain and improve access to education and skills for both young people and adults	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			
	DM34: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	DM31: 0	Short, Medium and Long-term	Borough wide	Through Policies DM33 the Council would establish attractive green links which provide public access wherever safe and practicable which would contribute towards minimising opportunities for crime and anti-social behaviour.
	DM33: +	Indirect		
	DM34: 0	Reversible Medium Certainty		

## Appendix F

---

# 2013 Focussed Review Alternative Assessment



Summary Appraisal of Policies and Alternatives – Table 3-1 from the 2013 Interim SA Report

Adopted Policy 2011	Revised Policy 2013	Reasons for changes	SA Comments
<p><b>CS7 The Amount of Housing Required</b></p> <p>The Regional Spatial Strategy gave the Council a target to allocate land to accommodate at least 15,400 additional residential units between 2001 and 2021. This is equivalent to 770 dwellings per year. However, the Council revised this figure to 700 dwellings per annum through the adopted Core Strategy (14,000 from 2001 to 2021) in the light of additional local evidence.</p> <p>Land supply for the years 2021 to 2027 is addressed principally by the Northern Fringe area.</p>	<p>The figure for the amount of housing required has been reduced to 13,550 dwellings, at 677 dwellings per annum between 2011 and 2031.</p> <p>Windfall sites will contribute to the land supply for housing.</p>	<p>The changes are based on updated population and household projection modelling work.</p> <p>The phasing of the housing sites is informed by the SHLAA and the figures of the land supply on PDL have been updated based on the availability of brownfield sites.</p> <p>The Northern Fringe area is considered for development at an earlier stage than foreseen in 2011 due to limited availability of brownfield sites within the borough.</p>	<p>The revised policy envisages the use of a greenfield land for housing supply throughout the duration of the plan rather than after 2021 as originally considered. Although the revised housing figures per annum suggest fewer residential dwellings to be built, the assessment shows that the revised policy performs well against SA objectives HW1 (health), HW2 (quality of life) and economic objectives (ER1, ER2, ER3, ER4). This is mostly due to the fact that the policy reflects the current housing needs of the borough and the housing growth is still substantial to attract further investment and create job opportunities.</p> <p>The revised policy is likely to have some negative effects on soil resources as it relies predominantly on greenfield land allocated at the Northern Fringe. However, windfall sites may provide opportunities to use PDL and reduce the impact on greenfield land use.</p> <p>Potential negative effects related to air quality, biodiversity, flood risk and crime could be mitigated and reduced in the long term by improved pedestrian and cycling infrastructure, the provision of public transport services, enhancement of open space and creation of habitats, the use of SuDS and safety by design principles policies.</p>
<p><b>CS10 Ipswich Northern Fringe</b></p> <p>Land at the Northern Fringe of Ipswich, north of Valley Road / Colchester Road and between Henley Road in the west and Tuddenham Road in the east,</p>	<p>In order to meet objectively assessed housing need, developing the whole Northern Fringe for approximately 3,500 dwellings is required throughout the duration of the plan. The Northern Fringe site consists of 195ha of land which will be</p>	<p>Land at the Northern Fringe of Ipswich will form a key component of the main source of supply of housing land in Ipswich during the plan period due to the limited availability of previously developed land within the borough and</p>	<p>Same as above.</p> <p>In addition, the revised policy performs well against SA objectives ER4, ER6, and ER7 through the provision of community and education facilities, though encouraging sustainable modes of transport and increasing the attractiveness of the area for inward</p>

Adopted Policy 2011	Revised Policy 2013	Reasons for changes	SA Comments
<p>will form the main source of supply of housing land in Ipswich after 2021.</p> <p>Due to the limited availability of previously developed land in the rest of the town, the delivery of 1,000 dwellings will be expected to commence prior to 2021 on land to the east of Henley Road and south of the railway line.</p> <p>The indicative capacity at the Northern Fringe identified in the SHLAA is about 4,500 dwellings.</p>	<p>developed as three neighbourhoods: a Northern neighbourhood (east of Henley Road and north of the railway line), a Southern neighbourhood (west of Westerfield Road and south of the railway line) and an Eastern neighbourhood (east of Westerfield Road).</p>	<p>the need to meet objectively assessed housing need.</p>	<p>investment.</p> <p>Negative effects from the revised policy are likely to occur with regards to air pollution due to increased traffic, loss of agricultural land, potential loss of habitats and waste generation. The revised policy performs better against SA objective ET6 (climate change) due to fewer residential dwellings being delivered in the long term hence reduced greenhouse emissions.</p> <p>Mitigation measures have the potential to reduce any negative effects through allocation of land for open space and parks, creation and enhancement of habitats where appropriate, and improved pedestrian and cycling infrastructure.</p>
<p><b>CS13 Planning for Jobs Growth</b></p> <p>The Council will promote sustainable economic growth in the Ipswich Policy Area. It will encourage the provision of at least 18,000 jobs between 2001 and 2025. In allocating sites for employment development, the Council will take account of the sectors projected to have the highest jobs growth between 2006 and 2026 as identified in the Suffolk Haven Gateway Employment Land Review (2009). These include construction; retail / hotels;</p>	<p>The Council will promote sustainable economic growth in the Ipswich Policy Area, with a focus on the delivery of jobs within the Borough. It will encourage the provision of in the region of 12,500 jobs between 2011 and 2031.</p> <p>There is a wider range of sectors anticipated to have highest job growth and these include:</p> <ul style="list-style-type: none"> <li>▪ advanced manufacturing and technology;</li> <li>▪ energy;</li> <li>▪ information and communication technology;</li> <li>▪ finance and insurance;</li> <li>▪ food, drink and agriculture;</li> </ul>	<p>The jobs figure is lower than that previously identified to reflect more recent evidence from the East of England Forecasting Model in 2012 and covers the period 2011 to 2031. The previous figure was derived from an indicative target of 30,000 jobs for the Suffolk Haven Gateway area including Suffolk Coastal and Babergh District Councils between 2001 and 2021 as identified in the East of England Plan.</p>	<p>Although the job figure is lower than that previously identified, it reflects the most recent Forecasting Model in 2012. The revised policy includes a much wider range of growth sectors and the economic SA objectives are likely to be achieved through the allocation and protection of employment land and through the joint work with local partners to encourage sustainable growth. It is also anticipated that employment opportunities will have indirect positive effects on SA objectives ER1 and ER4 (poverty and sustainable growth) as the policy continues to encourage local partnerships and envisages allocation of land for education uses. Opportunities are identified to address issues related to contaminated land of brownfield sites.</p> <p>Alternative 1 (the adopted policy 2011) performs better than the revised policy with regards to SA objectives</p>

Adopted Policy 2011	Revised Policy 2013	Reasons for changes	SA Comments
distribution; finance and other business services; and public services.	<ul style="list-style-type: none"> <li>▪ ports and logistics;</li> <li>▪ life sciences, biotechnology and bloodstock;</li> <li>▪ tourism;</li> <li>▪ creative and cultural industries.</li> </ul>		<p>HW1 (health), ER7 (inward investment), and CL1 (education) due to more opportunities for employment and training and more land allocated for employment use. Alternative 1 performs worse in the long term against the environmental SA objectives air quality, waste and climate change.</p> <p>Mitigation measures to reduce the negative effect would involve the use of sustainable modes of transport and reuse/recycling of materials.</p>
<p><b>CS14 Retail development</b></p> <p>Through the IP-One Area Action Plan, the Council will extend the Central Shopping Area to include the Westgate quarter and the land south of Crown Street and Old Foundry Road and allocate sites for retail development within it. This will enable the delivery of at least 35,000 sqm net of additional floorspace to diversify and improve the retail offer.</p>	<p>Through the Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD, the Council intends to extend the Central Shopping Area to include the Westgate quarter and allocate sites for retail development within it. This will enable the delivery in the region of 15,000 sqm net of additional floorspace to diversify and improve the retail offer. Further allocations will be made through the Site Allocations DPD review following a review of the Retail capacity study to address provision after 2026.</p>	<p>The reduction of the retail floorspace figure is considered as a result of the DTZ Opportunity Sites Study 2013 and more recent monitoring data in order to reflect the current needs of the borough and to avoid over supply of land for retail use.</p> <p>The revised policy allows more flexibility for further reassessment depending on the retail needs of the borough after 2026.</p>	<p>Although the retail floorspace has been significantly reduced, the revised policy still performs well against the economic SA objectives ER1 (poverty), ER2 (employment), ER4 (sustainable growth), ER5 (vital and viable town centres), and ER7 (inward investment). In addition, some benefits are identified with regards to the allocation of retail floorspace in easily accessible areas encouraging the use of sustainable modes of transport with some positive indirect effect on climate change (SA objectives ET4, ET5 and ET6). Air quality effects are likely to be worse if alternative 1 (adopted policy 2011) is implemented due to more traffic generation to and from Ipswich town centre on weekends and public holidays.</p>
<p><b>CS17 Delivering Infrastructure</b></p> <p>Ipswich Borough Council adopted a standard charge approach to the delivery of infrastructure. Affordable housing and on-site open space provision was dealt with through planning</p>	<p>Developer will contribute to the delivery of infrastructure through Section 106 Agreements or CIL.</p>	<p>Section 106 Agreements will secure only affordable housing, on-site infrastructure and specifically identified off-site infrastructure items that will not require the pooling of more than five obligations.</p> <p>The developers' contributions under CIL regulations will allow infrastructure improvements throughout the whole area</p>	<p>The revised policy performs particularly well against SA objectives ET4 (traffic), ET5 (access), ET6 (climate change). It strongly supports objective ET7 (flood risk) through clear commitment to allocate contributions against flood defence works.</p> <p>In addition, it is considered that the revised policy provides more opportunities to contribute to the achievement ET8 objective due to increased potential</p>

Adopted Policy 2011	Revised Policy 2013	Reasons for changes	SA Comments
obligations.		of Ipswich rather than just within the vicinity of new developments.	<p>to distribute contributions across the whole borough and cover a much wider area.</p> <p>Indirect positive effects are likely to occur with regards to economic objectives ER1 (poverty) and ER4 (sustainable growth) though the provision of key infrastructure where needs are identified.</p>

*Appendix G (Available Upon Request)*

---

*Extract of Review of the Plans, Programmes and Environmental Protection Objectives and Baseline Data - Suffolk Coastal – Taken from the Suffolk Coastal District Council - Sustainability Appraisal Scoping Report Site Allocations and Area Specific Policies DPD and Felixstowe Peninsula AAP - November 2014*

*Appendix H (Available Upon Request)*

---

*Extract of the Review of Plans, Programmes and Environmental Protection Objectives and Baseline Data - Mid Suffolk and Babergh – Taken from Babergh District Council and Mid-Suffolk District Council Development Management Policies & Strategic Site Allocations Joint Sustainability Appraisal – Scoping Report – June 2014*

---

Strategic Environmental Assessment and Sustainability Appraisal —Proposed Submission Core Strategy and  
Development Management Policies Document

Hyder Consulting (UK) Limited-2212959

\\ipswich\ibc\planning and development\spa\local plan oct 2012 onwards\regulation 19 documents\publication versions\core  
strategy\sustainability appraisals\proposed submission core strategy dpd sustainability appraisal.docx