



Strategic Environmental Assessment and Sustainability Appraisal

Proposed Submission Core Strategy and Policies
DPD Review

SA Report Addendum – Pre-Submission Main Modifications

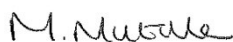
Ipswich Borough Council

Strategic Environmental Assessment and Sustainability Appraisal

Proposed Submission Core Strategy and Policies DPD Review

SA Report Addendum – Pre-Submission Main Modifications

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CONTENTS

1	INTRODUCTION.....	2
2	APPROACH.....	2
3	PRE-SUBMISSION MODIFICATIONS	3
	3.1 Pre-submission Main Modifications for Public Consultation.....	3
	3.2 Pre-Submission Additional Modifications.....	39
4	SA OBJECTIVE COMPATIBILITY	39
5	BASELINE AND REVIEW OF RELEVANT PLANS, PROGRAMMES AND ENVIRONMENTAL PROTECTION OBJECTIVES.....	39
6	HABITATS REGULATIONS ASSESSMENT.....	39
7	CUMULATIVE EFFECTS	40

Appendices

Appendix A

Sustainability Appraisal Matrices – Core Strategy Policies

Appendix B

Sustainability Appraisal Matrices – Development Management Policies

Appendix C

Pre-Submission Additional Modifications Table

Appendix D

Consultation Comments on the Proposed Submission SA Report

1 INTRODUCTION

This Sustainability Appraisal (SA) addendum provides an update to the published Strategic Environmental Assessment and Sustainability Appraisal – Proposed Submission Core Strategy and Policies DPD Review SA Report (December 2014) (known hereinafter as the Proposed Submission SA Report). The Proposed Submission Core Strategy and Policies DPD Review was consulted upon between 12th December 2014 to 5th March 2015. Following this consultation, a series of proposed modifications to the DPD have been identified. These have been categorised as either Pre-Submission Main Modifications or Pre-Submission Additional Modifications. Consultation is taking place on the Pre-Submission Main Modifications between 9th October 2015 and 23rd November 2015. This addendum to the Proposed Submission SA Report considers whether the proposed modifications alter the findings of the SA Report.

This report also seeks to provide an update on the consideration of consultation comments on the Proposed Submission SA Report received during the December 2014 - March 2015 consultation. The consultation comments are provided within Appendix D. Once this current consultation is complete, the Proposed Submission DPD and the Pre-Submission Main Modifications will be submitted to the Planning Inspectorate in December 2015 for independent examination. The Pre-Submission Additional Modifications will also be submitted. For submission, the Proposed Submission SA report and this Addendum will be combined and updated to form one SA report, for submission in accordance with Regulation 22(1)(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Advice has been received from the Planning Inspectorate that it is appropriate to consult on main modifications prior to the submission of development plan documents to the Government for examination. The Pre-Submission Main Modifications are substantive changes which alter the meaning of a policy or strategy (e.g. rewording policies to change their meaning, adding new sites or deleting existing ones). The Pre-Submission Additional Modifications are minor textual and grammar corrections; re-phrasing or limited new text to add clarity; or updates to figures and references, which are necessary due to alterations which have been made elsewhere or for which new information has come to light. These do not need to be consulted upon. This Sustainability Appraisal addendum considers whether any of the Main Modifications would affect the results of the Sustainability Appraisal and, for completeness, checks whether the Additional Modifications would result in any changes to the assessment.

This addendum should be read alongside the Proposed Submission SA Report and its Non-Technical Summary. Representations should be submitted in relation to the Sustainability Appraisal of the Pre-Submission Main Modifications only however in doing so reference can be made to the Proposed Submission SA Report insofar as its contents relate to this addendum.

Note that the Proposed Submission SA Report was produced by Hyder Consulting (UK) Limited who now operates as Arcadis Consulting (UK) Limited following a buy-out in 2014.

2 APPROACH

The focus of this addendum is on the assessment of the Pre-Submission Main Modifications. These are being consulted upon prior to submission of the Core Strategy and Policies DPD Review.

Section 3 of this report presents a table of the Pre-Submission Main Modifications and identifies if these would result in a change to the existing SA findings and if so, how and whether any mitigation is required. These tables should be read in conjunction with the relevant revised appraisal matrices which are presented in Appendices A and B. The scope and methodology,

including sustainability objectives, are contained within the December 2014 Proposed Submission SA Report – please refer to this when reading this addendum. Whilst not the main focus of this SA, the table in Appendix C considers whether any of the Council’s proposed Pre-Submission Additional Modifications would have any implications for the sustainability appraisal conclusions, for example through highlighting factual amendments. Please note the Pre-Submission Additional Modifications are not subject to consultation.

Section 4 of this report provides an update to the internal compatibility of the SA Objectives presented in the SA Report.

Section 5 of this report provides an update in relation to the SA baseline data and review of plans, programmes and relevant environmental protection objectives.

Section 6 of this report considers whether the consultation responses received in relation to the Proposed Submission SA Report alter anything within the SA.

Section 7 of this report provides an update to the cumulative effects assessment taking account of development sites outside of Ipswich Borough but adjacent or close to its boundary.

3 PRE-SUBMISSION MODIFICATIONS

3.1 Pre-submission Main Modifications for Public Consultation

The Pre-Submission Main Modifications presented in Table 3-1 below are the more substantive changes which alter the meaning of a policy or strategy (e.g. rewording policies to change their meaning, adding new sites or deleting existing ones). New text added is shown underlined, deleted text is shown struck through. The changes to the SA assessment matrices have been evaluated and explained within the ‘significance to the SA’ column. Where matrices have been amended these are included in Appendices A and B. Where it has not been necessary to amend a matrix it has not been included within this addendum – please refer to the Proposed Submission SA Report to view the relevant matrix in such instances.

These changes do not result in any changes to the significant effects identified in section 5 of the Proposed Submission SA Report and no further mitigation measures are considered necessary. The changes also do not result in any changes to the proposed monitoring framework which was set out in section 6.4 of the Proposed Submission SA Report.

Table 3-1 Pre-submission Main Modifications for Public Consultation

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
CHAPTER 8				
CS1 Sustainable Development – Climate Change	Amend i a) Requiring building and infrastructure design to incorporate water conservation, capture, recycling and efficiency measures and sustainable drainage systems (SuDS); and	For consistency with new optional requirement for water use which has been introduced through the Building Regulations.	Editorial update.	The modification is of an editorial nature and does not change the principle of the Policy which is still focussed on sustainable water use. Reference to water efficiency measures has been amended within the assessment of this Policy against SA Objectives ET3 and ET7.
CS2 The Location and Nature of Development	Add reference to community development support to clause a.: a) Focusing new residential ... of the town's district centres, <u>and supporting community development</u> ;	To ensure that major developments, whether high or lower density schemes, provide support for community development to promote wellbeing and social inclusion.	Editorial update.	The modification is of an editorial nature and does not change the principle of the Policy. The assessment of this Policy against SA Objectives ET5 and ER1 has been amended to include reference to how the focussed areas of new residential development can support community development and has been summarised within the Policy sustainability comments of the main SA Report. The assessment has not changed significantly.
CS2 The Location and Nature of Development	Remove 'prior' from sentence relating to the sustainable urban extension (below clause h.): ... is planned subject to the prior provision of ...	For consistency with CS10, Chapter 10 and the Ipswich Garden Suburb Supplementary Planning Document.	Editorial update.	The modification is of an editorial nature and does not change the principle of the Policy. The amendment brings Policy CS2 into line with the indicative trigger points identified in Table 8B. This modification has not resulted in any changes to the SA.
CS4 Protecting our Assets	Set out a strategic approach to the historic environment: Amend sentence 1: replace historical	To fully reflect NPPF, and ensure that all aspects of the historic environment are addressed, as the draft policy only referred to conservation areas.	Historic England	The modification seeks to encompass all aspects of the historic environment which would need to be fully reflected within the SA. The

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	with <u>heritage</u> Amend sentence three to read: “The Council will also conserve and enhance heritage assets within the Borough through its development management policies, <u>the use of planning obligations to secure the enhancement and promotion of the significance of any heritage asset, the maintenance of a list of buildings and other heritage assets of local importance, and taking steps to reduce the number of heritage assets at risk</u> ”.			policy is now more specific and stronger however the principle of the Policy remains unchanged. Reference to historical assets has been amended to heritage assets within the Policy sustainability comments of the main SA Report. The assessment of this Policy against SA Objective ET9 has been amended to include reference to the use of panning obligations as amended within the Policy text. The overall assessment score remains unchanged.
CS4 Protecting our Assets	Amend clause (a) to read ‘...sites, <u>and protected and priority species;</u> ’	To ensure compliance with the Biodiversity Duty.	Suffolk County Council	The modification ensures compliance with the Biodiversity duty and makes specific reference to provision within new development for protected and priority species strengthening the Policy. The assessment of this Policy against SA Objective ET8 has been amended to include protected and priority species. The overall assessment score remains unchanged.
CS6 The Ipswich Policy Area	Amend final paragraph as follows: ‘The preparation of joint or aligned development plan documents is to be explored later in the plan period , to ensure ...	To clarify that joint work would begin sooner within the plan period.	Home Builders’ Federation	The modification is of an editorial nature and does not change the principle of the Policy. If anything, it may bring forward more positive joint working sooner. This modification has not resulted in any changes to the SA of CS6, although this change has been

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
				<p>acknowledged in the assessment of CS6 against objective ER3 as contributing further towards meeting housing needs.</p> <p>Reference to 'later in the plan period' has been removed from the assessments of CS7 to reflect these changes to CS6.</p>
CS7 The Amount of Housing Required	<p>Amend the figures in the policy and accompanying tables to reflect the updating of the baseline to 1st April 2015:</p> <p>'... The Council will allocate land to provide for at least an additional 5,434<u>5,429</u> dwellings net in the Borough, with a lower amount of 4,734<u>4,629</u> expected by 2031 to ...'</p> <p>'... To meet the remaining requirement of 5,851<u>5,578</u> dwellings to 2031, the Council ...'</p> <p>Revised Tables 2, 3 and 4 are attached at the end of this schedule.</p> <p>Make consequent amendments to explanatory text:</p> <p>8.80 Table 2 shows that, as a result of housing completions between 2011 and 2014<u>2015</u>, 13,004<u>12,473</u> dwellings remain to be delivered between 2014<u>2015</u> and 2031 in order to meet the requirement.</p> <p>8.81 ... are capable of delivering the</p>	To ensure that the plan submitted is up to date.	Editorial	<p>The SA assessment has been amended to reflect the changes to the figures. These relatively minor amendments reflect the housing that has been built and permitted to 1st April 2015 so do not change the SA scoring. A slight change in the proportions of development to increase the number of dwellings in the IP-One area and decrease in the number at the Garden Suburb to be completed by 2031 does not change the SA effects given the small scale of change compared to the overall number of units proposed.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	housing requirement in the ten years to 2024/2025. The ...			
CS10 Ipswich Garden Suburb	<p>Amendments to reflect the current position:</p> <p>'The site, identified on the policies map, consists of 195ha of land which will be developed <u>comprehensively</u> as a garden suburb ...'</p> <p>'A prerequisite for any development being granted planning permission in the garden Suburb will be the preparation by the Council of a supplementary planning document providing a development brief to: <u>A supplementary planning document has been prepared to:</u></p> <ol style="list-style-type: none"> a. guide ... b. amplify ... c. etc. <p><u>Development proposals will be required to demonstrate that they are in accordance with the SPD. They should positively facilitate and not prejudice the development of other phases of the Ipswich Garden Suburb area and meet the overall vision for the comprehensive development of the area as set out in the SPD.'</u></p>	To align closely with the Ipswich Garden Suburb SPD and ensure that development follows the guidance set out within it.	Editorial update. Also Crest Strategic, Ipswich Society, Ben Gummer MP	<p>The policy is strengthened to ensure the SPD is adhered to.</p> <p>The sustainability comments of the main SA Report for this Policy have been amended to include the additional text within the Policy although the overall assessment score remains unchanged.</p>
CS10 Ipswich Garden Suburb/paragraph 8.108	<p>Insert new text to paragraph 8.108:</p> <p>'The infrastructure requirements at the Garden Suburb will be significant and include new roads ecological networks and green corridors, new public</p>	To clarify the Council's options in relation to ensuring the Garden Suburb is delivered.	Editorial update	The assessment of this Policy against SA Objectives HW2, ER3, ER4, ET4 and ET5 has been amended to note that the potential use of compulsory purchase powers to enable development and

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>transport routes and services, green infrastructure such as allotments and sports facilities, new schools, new recreation provision, healthcare provision and local shopping facilities. This infrastructure can also deliver benefits to the existing communities in the area and help to sustain them. <u>A comprehensive and coordinated approach to the development of the Garden Suburb is required to ensure the proper planning and delivery of this infrastructure. The Council will consider using its compulsory purchase powers, where necessary, to enable comprehensive development and infrastructure delivery to take place.</u> The detailed infrastructure requirements of the development of approximately 3,500 dwellings at the Garden Suburb and trigger points for the delivery of the items of infrastructure are identified in Table 8B in Chapter 10 of the Core Strategy. Prior to development on the Ipswich School Playing Fields site, replacement sports facilities will be required to be first provided in accordance with policy DM28. The site for replacement playing fields is allocated to the west of Tuddenham Road and north of the railway line.'</p>			<p>infrastructure delivery could support the SA Objectives. The extra wording reduces the uncertainty regarding whether or not essential infrastructure and amenities will be provided in a timely manner in the development of the Garden Suburb. The policy is strengthened to ensure a comprehensive approach is taken to infrastructure delivery.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
CS11 Gypsy and Traveller Accommodation	<p>Amend clause (a) to 'where possible preferably, within 1km of basic services including the public transport network.'</p> <p>Add in clauses a) to c) of Site Allocations Policy SP4:</p> <p>'Provision will be found within the Ipswich Policy Area for additional permanent pitches to meet the need as identified through the Gypsy and Travellers Accommodation Assessment.</p> <p><u>Applications for the provision of permanent pitches will be considered against the following criteria:</u></p> <ul style="list-style-type: none"> a) <u>The existing level of local provision and need for sites;</u> b) <u>The availability (or lack) of alternative accommodation for the applicants; and</u> c) <u>Other personal circumstances of the applicant, including the proposed occupants, must meet the definition of Gypsy or Traveller.</u> <p>Site for additional ...'</p>	<p>To address concern that if this were not possible a site could still be acceptable.</p> <p>To avoid confusion from having two policies in two plans.</p>	<p>National Federation of Gypsy Liaison Groups</p> <p>Editorial update</p>	<p>The modification addresses the provision of permanent pitches and does not change the principle of the Policy.</p>
CS13 Planning for jobs growth	<p>Amend to clarify that the job figure relates to the Borough:</p> <p>'It will encourage the provision of in the region of <u>approximately 12,500 jobs in the Borough</u> between 2011 and 2031...'</p>	<p>For clarity and to respond to comments which suggested it is not clear which geographic area the jobs figure relates to.</p>	<p>Editorial update and Northern Fringe Protection Group and others</p>	<p>The modification is of an editorial nature and does not change the principle of the Policy as this was already assumed in the original assessment.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
CS17 Infrastructure	<p>Amend policy to clarify that the direct provision of infrastructure by developers is allowed as mitigation for impacts (as an alternative to a commuted sum or CIL payment only). Add the following to the end of paragraph 2: <u>'...CIL charge, or other mechanism as agreed with the Council.'</u></p> <p>Add to end of policy <u>'The Council will seek contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment can be addressed, including for any measures not classified as infrastructure.'</u></p>	<p>For clarity and to ensure infrastructure is provided.</p> <p>To ensure that CS17 would enable contributions for HRA mitigation measures, including those that might not be classed as infrastructure, to be secured.</p>	<p>NHS England</p> <p>Editorial Update</p>	<p>The modification of the Policy broadens the form by which developers can mitigate against impacts.</p> <p>The assessment of this Policy against SA Objective ET8 has been amended to include benefits of the additional text on seeking contributions to ensure mitigation measures addressed within the HRA towards achieving the SA Objective.</p>
CS17 / new 8.183	<p>Insert new paragraph 8.183 relating to the above: <u>'The Habitats Regulations Assessment identifies a range of measures to ensure that potential impacts of increased recreational disturbance within Special Protection Areas and Special Areas of Conservation within and outside of Ipswich Borough are mitigated. This relates to mitigating the cumulative effect of housing growth across Ipswich Borough, in combination with housing growth in Suffolk Coastal district. The measures include the provision of the Country Park or similar high quality provision to the north of Ipswich, delivering parts b, d, e, g and h of policy CS16, production and implementation of visitor management plans at key sites and a monitoring programme to assess visitor impact over time. The Council is considering the production of a</u></p>	<p>To explain the reason for specific reference to HRA mitigation in the policy.</p>	<p>Editorial update</p>	<p>The new text provides an explanation to the addition of HRA mitigation measures to the Policy.</p> <p>This additional explanatory text has been considered within the assessment of the Policy against SA Objective ET10. The SA score has not changed.</p>

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	<u>mitigation strategy which would specify the measures required and how these should be delivered and funded.'</u>			
CS20 Key Transport Proposals	<p>Amend policy to add reference to proposals in policy SP15 of Site Allocations DPD: <u>'The Council will support further measures to facilitate cycling and walking in the Borough, as detailed through the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.'</u></p> <p>Add explanatory text to paragraph 8.208</p> <p>'Detailed proposals, including those for the Star Lane gyratory <u>and additional infrastructure for pedestrians and cyclists</u>, are included in ...'</p>	For clarity and completeness.	Ipswich Society	<p>The Policy is amended to include specific reference to supporting measures to facilitate cycling and walking in the Borough.</p> <p>The assessments of the Policy against SA Objectives ET1, ET4 and ET5 have been amended to reflect the Policy modification. The SA scores have not changed.</p>
CHAPTER 9				
DM1 Sustainable Design and Construction	<p>Amend to reflect Government's position on Code for Sustainable Homes, zero carbon dwellings and allowable solutions as follows:</p> <p>New development shall be required to achieve a high standard of environmental sustainability. This will be achieved by the following standards:</p> <p>a. New build residential development should achieve a minimum of Level 4 of the Code for Sustainable Homes standard or</p>	<p>To reflect withdrawal of Code for Sustainable Homes, introduction of optional water standards and powers for requiring energy efficiency standards (see Ministerial Statement March 2015).</p> <p>To also reflect the Government's statement contained within the Fixing the Foundations paper (HM Treasury, July 2015) which states that: 'The government does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards, but will keep energy efficiency standards under</p>	Editorial update (also CBRE)	<p>The Policy now requires new development to achieve a high standard of environmental sustainability by replacing the minimum level 4 Code for Sustainable Homes requirement with achieving 19% reductions of CO2 emissions below the 2013 Building Regulations Target Emission Rate.</p> <p>A new standard has also been introduced requiring development to meet water efficiency standards of 110 litres/person/day. These amendments will be reflected within the assessment in particular as reference to the Code for Sustainable</p>

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	<p>equivalent;</p> <p>a. <u>New build residential development should achieve reductions in CO₂ emissions of 19% below the Target Emission Rate of the 2013 Building Regulations (Part L);</u></p> <p>b. <u>New build residential development should meet water efficiency standards of 110 litres/person/day;</u></p> <p>bc. Conversions and changes of use of existing buildings providing new residential dwellings should achieve a minimum of BREEAM Domestic Refurbishment Very Good standard or equivalent;</p> <p>ed. New build non-residential development of 500m² and above for the whole development should achieve a minimum of BREEAM Very Good standard or equivalent;</p> <p>de. Conversions and changes of use to non-residential uses with an internal floor area of 500m² and above should achieve a minimum of BREEAM Very Good standard or equivalent.</p> <p>9.5 The National Planning Policy Framework sets out how local planning can best support the achievement of sustainable development. Specifically it</p>	<p>review, recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.'</p> <p>Note: The Planning and Energy Act 2008 allows planning authorities to require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations (Section 1(c)). Regulation 43 of the Deregulation Act 2015 sets out a provision for this to not apply to residential development, however this requires commencement via secondary legislation which has so far not been put in place.</p>		<p>Homes will need to be replaced. Notably, the emissions reductions targets will support SA Objective ET1 To improve air quality. It is noted however that whilst the Code for Sustainable Homes has been replaced, the new standards and BREEAM requirements maintain the principle of the Policy.</p> <p>The additional text in relation to the zero carbon Allowable Solutions scheme clarifies the Government's intention not to proceed with the scheme though energy efficiency standards will be kept under review in order that existing energy efficiency measures can become established.</p> <p>The SA assessment and main report have been amended to reflect the withdrawal of the Code for Sustainable Homes and the inclusion of new standards for water efficiency and CO₂ emissions. The SA scores have not changed.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>requires that local planning authorities plan with a presumption in favour of sustainable development. The aim of local planning authorities should be to adopt proactive strategies to mitigate and adapt to climate change and a move towards a low carbon future. <u>The National Planning Policy Framework states that w</u>When setting local requirements for a building's sustainability, local authorities should do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally prescribed standards. The Government has further reiterated its commitment to reducing carbon emissions from new development, and that all new homes will be required to be zero carbon from 2016 through its current Housing Standards Review¹ and also proposes requiring non-residential developments to be zero carbon from 2019.</p> <p><u>Under the 2008 Planning and Energy Act local planning authorities may require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. In accordance with</u></p>			

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	<p><u>the provisions of the March 2015 Ministerial Statement¹, the Council will expect new build residential development to achieve a 19% improvement in energy efficiency over the 2013 Target Emission Rate. This is equivalent to meeting the energy requirements of level 4 of the withdrawn Code for Sustainable Homes.</u></p> <p>9.6 A zero carbon home, as currently defined through the zero carbon buildings programme, is one where there are no carbon emissions resulting from the regulated energy requirements of the home (i.e. heating, lighting, hot water and fixed appliances but not plug-in appliances). It is proposed that this can be achieved through fabric energy efficiency measures, on-site or off-site renewable or low carbon energy generation or through financial contributions to carbon abatement measures established as part of the 'allowable solutions' programme. It is intended that as part of this mix, all new homes must meet energy efficiency standards equivalent to at least Level 4 of the</p>			

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	<p>Code for Sustainable Homes, which will be regulated through amendments to the Building Regulations². These proposed amendments to the Building Regulations equate to reductions in carbon emissions of around 20% above current (2013) requirements. <u>The Government had until recently been proposing to introduce zero carbon homes which would have been achieved through a requirement to meet level 4 of the Code for Sustainable Homes along with 'allowable solutions' (a range of measures including further fabric energy efficiency measures, on or off-site renewable/low carbon energy generation and/or financial contributions to carbon abatement measures). However, the Government has recently announced that it does not intend to proceed with the allowable solutions scheme or with the proposed increased energy efficiency requirement, but state that energy efficiency measures will be kept under review.</u>²</p> <p>9.7 The Code for Sustainable Homes (CfSH) sets out nine categories against which a home can be rated. Energy efficiency and water efficiency categories have their</p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>own minimum standards that must be achieved at every level of the CfSH, recognising their importance to the sustainability of any home. Other categories include better management of surface water run-off, waste management (including construction waste and encouraging household recycling), pollution and management of the home, all of which contribute to the sustainable performance of homes.</p> <p>9.8 The Council considers the CfSH to be a particularly appropriate tool to assess sustainability of new residential developments in that it is a nationally accredited system that considers a wide range of sustainability criteria in addition to energy and CO2 emissions, and in particular water use. Similar benefits apply to the use of the BREEAM system of assessment for multi-residential uses (e.g. care homes, sheltered housing, student accommodation) and for non-residential uses.</p> <p>9.9 Through the Housing Standards Review, referred to above, in addition to securing delivery of the zero carbon homes programme, the</p>			

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	<p>Government also intends to replace all elements of the Code for Sustainable Homes with updated Building Regulations and powers for planning authorities to require more stringent 'optional' requirements through planning policies where these can be justified on the basis of need. The optional requirements are proposed to cover the accessibility (for example for the elderly and disabled) and water efficiency. The Government is also proposing a nationally described space standard through the Housing Standards Review (as referred to alongside policy DM30).</p> <p>9.10 Whilst it is clear that much of the drive for carbon reduction in new homes and non-domestic buildings will be handled under the Building Regulations, the Council nevertheless considers it appropriate to have a planning policy requiring new development to achieve sustainability improvements beyond the requirements of Building Regulations both to support the carbon reduction agenda and to ensure the achievement of a more holistic approach to sustainable development through the achievement of the much wider range of environmental and social benefits that these schemes provide for.</p>			

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	<p>9.11 The policy provides for some flexibility in exceptional circumstances where it can be clearly demonstrated that achieving the required <u>rating standard</u> for the type and scale of development in question would either be not feasible or not viable in the light of such considerations as site constraints, other planning requirements, other development costs, and the prevailing market conditions at the time. In such circumstances the Council may agree to a lower CfSH or <u>BREEAM rating or lower energy efficiency standards</u> being achieved having regard to other merits of the scheme in terms of sustainability and urban design. Development will still need to meet the requirements of the Building Regulations in force at the time.</p> <p>9.13 <u>In relation to BREEAM requirements,</u> the policy will be implemented through a requirement for the submission of Design Stage Assessments and Post Construction Reviews, carried out by a qualified CfSH or BREEAM assessor (as appropriate), for all planning applications for qualifying development. It will be expected that planning applications also be accompanied by a sustainability</p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>statement that explains and illustrates how sustainability considerations have influenced scheme design.</p> <p><u>Through the Housing Standards Review the Government has introduced powers for planning authorities to require 'optional' standards for water efficiency. The East Anglian area is identified as an area of 'severe water stress' and lowering water demand is identified as one of a range of measures to balance supply and demand in the Anglian Water Resources Management Plan 2015. The optional requirement, which requires development to meet water efficiency standards of 110 litres/person/day (compared to Building Regulations requirements of 125 litres/person/day) is set out in Part G of the Building Regulations³.</u></p> <p>9.14 Where appropriate, mitigation measures shall be secured by condition to ensure that any pollution through air, noise, dust or vibration during the construction phase of development will not be detrimental to the amenity of neighbouring uses. Relevant policy guidance in respect of neighbouring amenity can be found in DM26.</p> <p>¹ <u>Planning Update March 2015</u></p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>(Ministerial Statement)</p> <p>² <u>Fixing the Foundations – Creating a More Prosperous Nation (HM Treasury, July 2015)</u></p> <p>³ <u>2010 Building Regulations: Sanitation, Hot Water Safety and Water Efficiency – Approved Document (2015 Edition)</u></p> <p>⁴ <u>Housing Standards Review – Technical Consultation (Department for Communities and Local Government, 2014)</u></p> <p><u>Next steps to zero carbon homes – Allowable Solutions (Department for Communities and Local Government, 2014)</u></p>			
DM5 Design and Character	<p>Amend Part e. of DM5 as follows:</p> <p>‘Protecting and enhancing the special character and distinctiveness of Ipswich, including significant views that are recognised as being important and worth protecting , <u>the setting of any nearby listed buildings</u>, and helping to reinforce the attractive physical characteristics of local neighbourhoods and the visual appearance of the immediate street scene’</p>	For completeness.	Suffolk Preservation Society	<p>The modification is of an editorial nature for completeness in relation to the protection of the character and distinctiveness of Ipswich to include the setting of any nearby listed buildings, it does not change the principle of the Policy.</p> <p>The SA assessment has been amended to reflect the protection of the setting of listed buildings although the SA scores have not changed.</p>
DM5 Design and Character	<p>Add to end of policy DM5: <u>In new residential development of 10 or more dwellings, 35% of new dwellings will be required to be built to Building</u></p>	To reflect the introduction of new optional standards for accessible and adaptable dwellings and wheelchair user dwellings.	Editorial update, CBRE	The new text within the Policy reflects the introduction of new optional standards for accessible and adaptable dwellings and wheelchair

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>Regulations standard M4(2). Where affordable housing is provided a proportion of dwellings are required to be built to Building Regulations standard M4(3) as part of the affordable housing provision. The Council will consider waiving or reducing the requirement where the circumstances of the proposal, site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable.</u></p> <p>The following text to be amended accordingly in 9.43: In an era of rapid social, economic, environmental and technological change, buildings need to be designed to be adaptable to respond in a sustainable manner to the changing needs of occupiers. This is the 'long-life, loose- fit' principle. It could be achieved using the lifetime homes principle to ensure that homes can meet families' changing needs over time. For commercial buildings, it could mean ensuring that a building designed as an office for one organisation is physically capable of being subdivided, should future patterns of demand change.</p> <p>Insert new paragraphs after 9.43: <u>In 2015, the Government introduced new 'optional' Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings.</u></p>			<p>user dwellings. This addition does not change the principle of the Policy.</p> <p>The main SA report and the assessment of the Policy against HW1, HW2 and ER3 have been appropriately amended to reflect the housing requirements and new optional Building Regulations standard relating to accessible and adaptable dwellings. A positive score has been added against the quality of life SA Objective HW2.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>These optional standards can only be required through a planning policy requirement. The national Planning Practice Guidance states that 'Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements.'</u></p> <p><u>The 2014 Suffolk Housing Survey indicates that 10% of Ipswich residents live in a home which has been adapted in some way for accessibility purposes. The results indicate that a further 3% of Ipswich residents currently require adaptations to their dwellings. Since 2007 almost 1,600 adaptations have been carried out on the Council's housing stock. The number and proportion of elderly residents in the Borough is predicted to increase over future years, potentially further increasing the need for dwellings to be accessible and adaptable.</u></p> <p>Delete: 9.51 ... The Council also encourages new housing to be built to the Lifetime Homes standard, which makes it easier for people to remain in their own homes as their mobility needs change, through encouraging homes to be built in a way</p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	in which rooms can be used flexibly over time.			
DM6 Tall Buildings	Amend clause j. to read: 'the effect of the building in terms of its silhouette and impact on strategic views, with particular reference to conservation areas, <u>listed buildings and other heritage assets</u> , and the wooded skyline visible from and towards central Ipswich.'	For clarity.	Historic England	The modification is of an editorial nature providing clarity of the text and does not change the principle of the Policy . The main SA report and the assessment of the Policy have been appropriately amended to reflect the addition of listed buildings and other heritage assets. This is not sufficient to further improve the positive SA scores against the heritage and townscape SA Objectives.
DM8 Heritage Assets and Conservation	Amend the policy as follows: Part a. Listed Buildings Re-label as <u>Designated and Undesignated Assets</u> Amend the first paragraph of Part a. to remove the word historical ('... adversely affect its historical significance.')	To ensure the policy is effective and consistent with national policy.	Historic England Suffolk County Council	The re-labelling and addition of new text provides consistency with national policy. The principle of the Policy remains unchanged and the additions serve to strengthen the Policy. The assessment of the Policy has been appropriately amended to reflect the additional Policy text in relation to SA objective ET9 although the SA scores have not changed.
	Add a third paragraph to Part a. as follows: <u>The Council will resist the demolition or partial demolition of both designated and undesignated heritage assets as outlined in paragraph 133 of the National Planning Policy Framework.</u> Add a fourth paragraph to Part a. as			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>follows:</p> <p><u>The Council will seek to preserve Scheduled Monuments, scheduled parks and gardens and other remains of national importance and their settings, in a manner appropriate to their significance.</u></p> <p>Part b Conservation Areas</p> <p>Amend point (i) of Part b. to read:</p> <p>the building/structure does not <u>make a positive contribution to the significance</u> of the conservation area.</p> <p>Part c. Archaeology</p> <p>Within the Area of Archaeological Importance defined on the policies map, Development will not be permitted which may disturb remains below ground, unless the proposal is supported by an appropriate archaeological assessment of the archaeological significance of the site and, if necessary, a programme of archaeological work—<u>investigation</u> in accordance with that assessment.</p> <p>Planning permission will not be granted if the remains identified are of sufficient importance to be preserved in situ and</p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>cannot be so preserved in the context of the development proposed, taking account of the necessary construction techniques to be used.</p> <p>In all other circumstances where planning permission is to be granted, the Council may impose a condition allowing an appropriate contractor to monitor the works under archaeological supervision and control during the necessary stages of construction.</p> <p>In locations outside of the Area of Archaeological Importance, where it becomes apparent through a planning application that there is an overriding case for archaeological remains found to be preserved in situ, then the requirements for the above sites within the Area of Archaeological Importance will apply. Where <u>archaeological potential is identified but</u> there is no overriding case for any remains to be preserved in situ, development which would destroy or disturb potential remains will be permitted, subject to an appropriate programme of archaeological investigation, and recording <u>being undertaken prior to the commencement of development, reporting and archiving.</u></p> <p>Add a heading of <u>Climate Change</u></p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	above the final policy paragraph. <i>(See also minor changes to the explanatory text to DM8 in the additional modifications table.)</i>			
DM10 Protection of Trees and Hedgerows	Clarify that clause (b) relates to applications for works to trees through adding the following text: <u>'In relation to applications for works to trees, only granting...'</u>	For clarity	CBRE	The modification is of an editorial nature providing clarity of the text and does not change the principle of the Policy.
DM12 Extensions to Dwellinghouses and the Provision of Ancillary Buildings	Amend annex policy to be more explicit in relation to extensions: ... development that would provide for a residential annex will only be permitted where this: e. <u>is an extension that would be subordinate in scale to the main residence and capable of being integrated into the main dwellinghouse once the dependency need has ceased;</u>	To clarify the policy.	Editorial update.	The modification is of an editorial nature providing clarity of the text and does not change the principle of the Policy. This modification has not resulted in any changes to the SA.
DM18 Car and Cycle Parking	Amend car parking policy to refer to adopted standards: The Council will require minimum <u>adopted</u> standards of ...	To reflect the Council's adoption on 10 th February 2015 of the Suffolk Parking Standards.	Editorial update.	The modification is of an editorial nature and does not change the principle of the Policy. This modification has not resulted in any changes to the SA.
DM20 The Central Shopping Area and DM21 District and Local Centres	Include reference to betting shops and payday loan shops alongside references to A2-A5: <u>'... A2-A5 uses, betting shops and payday loan shops will be ...'</u>	Betting shops and payday loans shops were previously A2 and would have been included in calculations of A2-A5 frontage. They are now Sui Generis uses and need particular reference within the policy. This does not change the meaning of the policy at the time it was consulted upon.	Editorial update.	The modification is of an editorial nature and does not change the principle of the Policy. This modification has not resulted in any changes to the SA.

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
DM24 Affordable Housing	<p>Amend clause a. as follows:</p> <p>a. Is designed and built to at least the same standard as the market housing, including the appropriate level of the Code for Sustainable Homes at the time;</p>	To align with changes to the Code and Policy DM1.	Crest Strategic, CBRE	<p>The deletion reflects the withdrawal of the Code for Sustainable Homes and does not change the principle of the Policy. The requirements of DM1 are still relevant and the lack of a cross-reference does not affect the overall outcome.</p> <p>Reference to the Code for Sustainable Homes has been removed throughout the SA.</p>
DM25 / 9.149	<p>Add additional criteria to DM25 relating specifically to starter homes: <u>In the case of Starter Homes, these would only be permitted where:</u></p> <p>a) <u>there is no demand for continued use of the site for employment or commercial purposes as demonstrated by a marketing programme;</u></p> <p>b) <u>where the site is allocated for employment or commercial uses it is demonstrated that there is no reasonable prospect of the site being used for the allocated use, or other uses as detailed under the terms of criteria a-e above, during plan period; and</u></p> <p>c) <u>housing would be compatible with existing and planned surrounding uses.</u></p> <p>New paragraph for supporting text: <u>On 2nd March 2015 the Government introduced its Starter Homes policy¹. Under this policy opportunities should be sought for provision of starter homes</u></p>	<p>Whilst the Government has provided policy in the form of the Ministerial Statement dated 2nd March 2015 and within the updated Planning Practice Guidance, it is considered important to include criteria within the Local Plan to ensure the policy does not undermine other policies within the Plan, particularly in relation to delivery of employment and commercial development. In particular, due to the constrained nature of the Borough boundary, the loss of employment land which has a prospect of being used for such purposes during the plan period would undermine the Council's efforts to meet the requirements of paragraph 20 of the NPPF which states 'To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.' The proposed policy wording ensures the Council's approach to Starter Homes is in accordance with the economic policies of the NPPF as well as the Starter Homes policy.</p>	Editorial update.	<p>The additional criteria added to the Policy specifically relates to starter homes which previously have not been mentioned within the Policy.</p> <p>The additional starter homes criteria have been referenced within the assessment against SA Objectives ER3 and ER4. The overall result against ER3 is recorded as positive and negative and against ER4 has not changed.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>on 'commercial and industrial land that is either underused or unviable in its current or former use, and which has not currently been identified for housing.' Updates to the Planning Practice Guidance identify the circumstances in which starter homes should be supported. However, for clarity of how this policy should operate alongside DM25, and to ensure consistency with the approach in both the National Planning Policy Framework and other policies of the Local Plan in relation to economic growth, it is considered appropriate to establish a clear set of criteria on how such applications will be considered.</p> <p>¹ Written statement to Parliament – Starter Homes (Department of Communities and Local Government, March 2015)</p>			
DM25 / 9.152	<p>Add to the end of 9.152: <u>'Where compatible with adjacent uses, waste facilities could come forward on land within employment areas.'</u></p>	<p>To ensure compliance with the Suffolk Minerals and Waste Plans.</p>	<p>Suffolk County Council.</p>	<p>The addition would allow for the provision of waste facilities where compatible within employment areas.</p> <p>The assessment of the Policy against SA Objective ET3 'To reduce waste' has been reassessed to score both positive and negative as the provision of waste facilities on employment land where compatible would make contributions towards achieving the SA Objective. Note: waste facilities themselves would be considered under the policies of the Suffolk Waste Core Strategy.</p>
DM29 Provision of	<p>Re-write policy DM29 as follows:</p>	<p>To ensure compliance with CIL</p>	<p>Editorial update.</p>	<p>The rewrite of the Policy ultimately</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
New Open Spaces, Sport and Recreation Facilities	<p><u>The Council will ensure that public open spaces and sport and recreation facilities are provided through new developments to meet the needs of their occupiers and, where appropriate, contributions are provided to strategic accessible natural greenspace.</u></p> <p><u>In all new residential developments of 15 dwellings or more (or on sites of 0.5ha or more), at least 10% of the site area, or 15% in high density residential developments, should consist of on-site green space that is usable by the public, which will contribute to meeting the overall requirement. Where possible, public green spaces should be well overlooked, and the provision within large-scale developments should be distributed throughout the site.</u></p> <p><u>These developments would also be expected to mitigate their own impact through the provision of the various open space and facility typologies identified in Appendix 6. Where applying the quantity standards based on a population forecast of the development would exceed the Council's minimum size threshold for the typology, there will be a presumption in favour of on-site provision. Where this is not practicable or the Council prefers enhancement opportunities at existing facilities, then an in lieu contribution to new or existing off-site provision should be secured through a planning obligation.</u></p>	<p>Regulations 122-124, which came into force in April 2015.</p> <p>Also need to reflect possibility of securing developer funding for strategic accessible natural greenspace provision / green rim, including possibly outside Borough.</p>		<p>ensures compliance with CIL Regulations 122-124 and reflects the possibility of securing developer funding for strategic accessible natural greenspace provision / green rim. The principle of the Policy and its assessment remain unchanged.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>Where the quantity standard for a typology would not meet the minimum size threshold, a qualitative assessment of existing provision within the Appendix 6 accessibility standard distance from the site (480m or 720m) should be made to determine whether an enhancement opportunity exists. Where a reasonable improvement can be identified, a contribution should be secured where this would be necessary to make the development acceptable.</u></p> <p><u>The effect of on-site provision or off-site enhancements on development viability will also be a consideration, although the resultant provision to account for this must not be at a level that the development would not be deemed sustainable in either social or environmental terms.</u></p> <p><u>One-for-one replacement dwellings will be exempt from the requirements of the policy, because they are likely to have a minimal impact on the overall requirement. In addition, standards for children's and young people's facilities will be not be applied to elderly persons' accommodation and nursing homes.</u></p> <p><u>For non-residential developments of 1,000 sq. m floor space or more, the provision of or a contribution to public open spaces and outdoor sports facilities will be negotiated on a case-by-case basis.</u></p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>Re-write the reasoned justification as follows:</p> <p><u>9.172 The policy outlines that at least 10% of the site area of all qualifying developments must consist of public green space, which shall include soft landscaping and tree planting to facilitate sustainable urban drainage and enhance the climate change resilience, appearance and biodiversity value of the development. In high density residential developments (defined in Policy DM30), the green space requirement will be a minimum of 15% of the site area, to compensate for the more limited amenity space in these developments and to provide an attractive setting for the buildings. The 10%/15% requirement will also contribute to the amenity green space and/or natural and semi natural green space standards as outlined in Appendix 6. It is expected that amenity green spaces in particular would be located on generally flat land in order to maximise their use. Where provision is distributed throughout large-scale developments, it is important that it adequately meets the intended use.</u></p> <p><u>9.173 Where possible, green spaces should provide for wildlife habitats designed and located so as to create a link with existing ecological networks and/or green corridors, which may include the proposed green rim around</u></p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>Ipswich for sites on the edge of the Borough. All planting proposals should be accompanied by an appropriate management plan. Within IP-One, the provision of a public civic space may be considered in lieu of green space where this makes a positive contribution to the townscape.</u></p> <p><u>9.174 The policy makes provision for instances where it is not practicable to include a type of open space or facility on-site. This will include factors where its provision would compromise other standards in this Plan, such as meeting the density requirements of Policy DM30 or the minimum garden sizes of Policy DM3.</u></p> <p><u>New para: Accessible natural greenspace is defined by Natural England as places where human control and activities are not intensive so that a feeling of naturalness is allowed to predominate. There is no local standard for the provision of strategic accessible natural green space ('ANG') per person or dwelling. However, the mapping of existing provision against the 'Nature Nearby' standards has identified areas of deficit, particularly across north west Ipswich. The Council will aim to address these deficits where it can be achieved through also meeting the local standards for natural and semi-natural greenspace.</u></p> <p><u>9.175 The Council's Public Open Space</u></p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>Supplementary Planning Document (SPD) will provide guidance on population forecasts from new developments and outline the minimum size standard for each Appendix 6 typology. The document will also indicate per square metre capital and maintenance costs for each typology where these are to be provided and/or maintained by the Council, and to guide in lieu contributions for new off-site provision. Where a contribution is secured to enhance an existing area of open space or facility, this sum will be based on the works required and in proportion to the scale of the development.</u></p> <p><u>9.176 The quality standards for the various typologies are identified by the Ipswich Open Space, Sport and Recreation Study, Play Strategy, Allotment Strategy and Open Space and Biodiversity Policy/Strategy, and any subsequent updates to these. Furthermore, the need for formal sports provision is currently being updated by the production of the Indoor Sports Facility Strategy and the Playing Pitch Strategy.</u></p> <p><u>9.177 New commercial development may create a demand for amenity green space and/or sports facilities. Therefore, specific needs will be considered in the context of each application with the quantity standards in Appendix 6 applied on the basis of the total number</u></p>			

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
9.181 / 9.182 (DM30)	<p data-bbox="405 189 808 221">of full-time equivalent employees.</p> <p data-bbox="405 221 808 280">Amend to include new nationally described space standards:</p> <p data-bbox="405 312 887 695">9.181 In order to ensure that dwellings, and especially flats, provide versatile and attractive living space that appeals to a wide audience and is therefore more sustainable in changing market conditions, the Council will encourage developers to exceed minimum floorspace areas used by the former English Partnerships in its own developments (Quality Standards 2007) (gross internal floor area).</p> <p data-bbox="405 759 887 1110">9.182 These are as follows;</p> <ul data-bbox="506 791 887 1110" style="list-style-type: none"> • at least 51 sq m for a 1 bed/2 person dwelling • at least 66 sq m for a 2 bed/3 person dwelling • at least 77 sq m for a 2 bed/4 person dwelling • at least 93 sq m for a 3 bed/5 person dwelling and • at least 106 sq m for a 4 bed/6 person dwelling. <p data-bbox="405 1174 887 1366">9.183 The Government, through the Housing Standards Review, is currently proposing a set of national space standards. In relation to the standards set out above these would generally</p>	Nationally described space standards were introduced in March 2015 and the recent update to the Planning Practice Guidance states that planning authorities should only refer to these.	Editorial update, CBRE	<p data-bbox="1659 217 2125 344">The Policy update reflects current housing space standards. The principle of the Policy remains unchanged.</p> <p data-bbox="1659 376 2125 440">This modification has not resulted in any changes to the SA.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p>require larger floor areas where two storey 1 or 2 bed dwellings are proposed and where three storey 3 or 4 bed dwellings are proposed and could become a requirement through the adoption of planning policy to that effect.</p> <p><u>9.181 In order to ensure that dwellings, and especially flats, provide versatile and attractive living space that appeals to a wide audience and is therefore more sustainable in changing market conditions, the Council will encourage developers to meet the Nationally Described Space Standards as set out in Technical Housing Standards – Nationally Described Space Standard (Communities and Local Government, 2015).</u></p>			
DM31 / 9.187	<p><u>9.187....'Assessments under the Habitats Directive have been undertaken in relation to the production of the Core Strategy and Policies DPD Review and the Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD. Mitigation measures have been identified and in some instances developer contributions may be sought in relation to these and/or additional mitigation measures identified through assessments at planning application stage.'</u></p>	<p>For clarification that, whilst not specified under CS17 other than in relation to the country park and strategic green infrastructure, developer funding may be sought to mitigate impact(s) upon European protected site(s).</p>	<p>Editorial update</p>	<p>The additional text provides clarification within the Policy that developer contributions may be sought to mitigate against impacts to European protected sites.</p> <p>The assessment of the Policy against SA Objectives ET8 has been amended to reflect the additional Policy text although the SA score against the Biodiversity SA objective is already major positive so has not been amended further.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
DM31 / 9.188 / 9.189	<p>Amend paragraph 4 of the policy:</p> <p>'The Council will seek to Development will be required to conserve and enhance the nature conservation...'</p> <p>'...and County Geodiversity Sites identified on the policies map, and Suffolk Biodiversity Action Plan <u>protected and priority species and habitats, by ...,'</u></p> <p>Add new sentence to the end <u>'Enhancements for protected sites and protected and priority species will be expected where possible.'</u></p> <p>Add to 9.188 <u>'Many species are protected through specific legislation including the Wildlife and Countryside Act 1981 (as amended). England's priority species and habitats are those which are included on the list produced under Section 41 of the Natural Environment and Rural Communities Act 2006. Suffolk's priority species and habitats are identified in the Suffolk Biodiversity Action Plan.'</u></p>	To comply with the Biodiversity Duty and for clarity.	Suffolk County Council	<p>The modification amends the Policy making nature conservation a requirement for development.</p> <p>The additional text added to comply with the Biodiversity Duty and for clarity serves to strengthen the Policy and will not change the SA.</p> <p>The assessment of the Policy against SA Objective ET8 has been amended to reflect the additional Policy text. The SA score has not changed.</p>

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	Add to 9.189: <u>The British Standard Guidance 'Biodiversity: Code of Practice for Planning and Development (BS42020)' provides an approach to dealing with biodiversity issues in development.</u>			
DM32	Remove ' to non-community uses ' from paragraph 2.	Loss of one community use for another may still result in the loss of a valued facility.	Theatres Trust	This removal clarifies that redevelopment or change of use of a community facility is not solely to non-community uses. This modification has not resulted in any changes to the SA.
DM33	Amend 1 st sentence of paragraph 4 as follows: 'Within the defined green corridors, development will only be permitted where it would maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions.' <u>'Development within the green corridors identified on Plan 6 will be expected to maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions.'</u>	To clarify that the policy does not imply that development within the corridors would not be supported.	CBRE	The modification provides clarification in that it no longer implies that development within green corridors would not be supported. This modification has not resulted in any changes to the SA.
DM34 Countryside	Amend reference to the AONB: In the case of the AONB, major development will only be permitted in exceptional circumstances in accordance with NPPF paragraph 116. <u>The landscape and scenic beauty of the</u>	To ensure that development outside the AONB would not impact upon it.	Suffolk County Council.	The modification simply places an emphasis on the importance of the landscape and scenic beauty of the AONB in the consideration of major development but maintains the essence of the Policy. The assessment of the Policy against SA Objectives ET8 has been

Policy / paragraph	Main modification	Reason	Objector(s)	Significance to the SA
	<p><u>AONB should be conserved.</u></p> <p>Proposals for development in the countryside should:</p> <ul style="list-style-type: none"> a. Maintain ...; b. Conserve the landscape and scenic beauty of the AONB; 			<p>amended to reflect the additional Policy text. The SA score has not changed.</p>
DM34 Countryside	<p>Amend clause f. '<u>f. In the case of new housing, be a dwelling: i) required for the efficient operation of an existing rural enterprise which cannot be met nearby; ii) required to secure the future of a heritage asset; iii) which re-uses a disused building and enhances the immediate setting; or iv) of exceptional and innovative design.</u>'</p> <p>Add additional sentence: '<u>Proposals for residential development of more than one dwelling would be considered in the context of criteria a to e above.</u>'</p>	To fully reflect NPPF paragraph 55.	Gladman Developments	<p>The additional amendment to the clause and additional text added to the Policy do not alter the principle of the Policy.</p> <p>The assessment of the Policy against SA Objectives ET2 and ET10 has been amended to reflect the additional Policy text. The SA score has not changed.</p>

3.2 Pre-Submission Additional Modifications

Whilst the focus of this SA Addendum is on the assessment of the Pre-Submission Main Modifications, the table in Appendix C checks whether the Council's proposed Additional Modifications would change the SA. The Additional Modifications presented in Appendix C are textual and grammar corrections, re-phrasing or limited new text to add clarity, or updates to figures and references, which are necessary due to alterations which have been made elsewhere or for which new information has come to light. The consideration of the Additional Modifications has resulted in some factual updates to the SA but has not resulted in any change to the significant effects identified in Section 5 of the Proposed Submission SA Report and no further mitigation measures are considered necessary. No changes to the monitoring framework, contained in Section 6 of the Proposed Submission SA Report, are considered necessary.

4 SA OBJECTIVE COMPATIBILITY

The Proposed Submission SA Report includes an internal compatibility assessment of the 21 SA Objectives in order to identify any potential areas of internal incompatibility (see 3.2.4 of the Proposed Submission SA Report).

Generally the SA Objectives were either compatible or no clear impacts between the objectives could be established. However, some uncertainties were identified. It should be emphasised that this is an assessment of the SA objectives against each other, without considering any potential effects of the plan. Therefore it is not correct to amend the assessment in light of the subsequent assessment of Policy CS10 Ipswich Garden Suburb, for example, as the same objectives need to be applied equally to all aspects of the DPD and the proposals within it. For example, whilst meeting the housing requirements for the whole community promoted in SA Objective ER3 could result in conflicts with other objectives relating to, for example traffic growth for some developments, it is not inevitable, although probable, at this stage of the SA that this will be the case for all and therefore the assessment of uncertain against this objective is still applicable. Similarly, some of these uncertainties could be addressed through mitigation measures proposed in other policies within the DPD.

5 BASELINE AND REVIEW OF RELEVANT PLANS, PROGRAMMES AND ENVIRONMENTAL PROTECTION OBJECTIVES

Since the SA Report was produced at the end of 2014, some aspects of the baseline information used in the SA have changed. Similarly, there are a small number of additional or revised relevant plans, programmes or environmental protection objectives that could also be considered. It is considered that the evolution of this baseline is limited, minor and would not result in changes to the SA objectives or findings. However, where changes have occurred, these will be updated in the revised SA Report to be produced for submission in December 2015.

6 HABITATS REGULATIONS ASSESSMENT

Comments from Natural England on the Proposed Submission SA report stated that further cross-reference is needed between the Habitats Regulations Assessment (HRA) and the Sustainability Appraisal. The Proposed Submission SA Report provides cross-references to the

HRA of the Proposed Submission Core Strategy DPD which was undertaken in parallel, 'Habitats Regulations Assessment for Ipswich Borough Council Proposed Submission Core Strategy and Policies DPD Review December 2014'. This assessment identified that the DPD would not be sound if an Appropriate Assessment could not show that there was no adverse effect upon the integrity of nature conservation sites of European importance as recognised by their designation as Special Areas of Conservation, Special Protection Areas and/or Ramsar sites.

The screening concluded that the Proposed Submission Core Strategy and Policies DPD was likely to have a significant effect on European sites, particularly with respect to 'The Amount of Housing Required' (Policy CS7) and related policies (CS2, CS10) particularly in terms of the potential for recreational disturbance to birds in the Stour and Orwell Estuaries Special Protection Area. An Appropriate Assessment was therefore undertaken and this concluded that policy CS7 and related policies would not have an adverse effect upon the integrity of European Sites, subject to mitigation measures being applied.

An addendum to the Habitats Regulations Assessment has been produced to consider the effects of the Pre-Submission Main Modifications and Pre-Submission Additional Modifications. This concludes that the conclusions of the Proposed Submission HRA Report remain unchanged. Further reference to the conclusions of the HRA have been added to the SA assessment matrices in Appendix A of this addendum, particularly in relation to assessment of CS7 against SA objective ET8.

A greater degree of cross-referencing will be provided in the revised SA Report for submission in December 2015 in order to ensure the consistencies between the findings of the SA and HRA are clear.

7 CUMULATIVE 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). This assessment is presented in Section 5 of the Proposed Submission SA Report. In reflection of representations submitted, potential cumulative effects have been considered in relation to sites located on the edge of the town but outside the Borough boundary. These sites are:

- Babergh / Ipswich fringe allocation (approximately 350 homes at south west Ipswich) (Babergh Core Strategy and Policies, February 2014)
- Sproughton Strategic Employment Site allocation (former Sugar Beet Factory site) (Babergh Core Strategy and Policies, February 2014)
- Adastral Park (2,000 homes at Martlesham) (Suffolk Coastal Core Strategy and Development Management Policies, 2013)
- Trinity Park – 200 homes (Suffolk Coastal – planning permission)

Table 7-1 summarises the cumulative and synergistic impacts of the plan. This has been updated to provide reference to the above sites where relevant. Section 6 of the Proposed Submission SA Report also stated that the cumulative effects were considered to be the significant effects of the plan. Whilst the cumulative effects table has been updated to reflect development outside of the Borough, no amendments to the proposed monitoring framework are considered necessary.

Table 7-1 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 in need HW2 To improve the quality of life where people live and encourage community participation)	Positive	Life expectancy from birth for males is slightly lower than the national average and life expectancy from birth for females is slightly higher than national averages. Whilst health and well-being is affected by a number of factors, there is the potential 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. The provision of 350 homes at the Babergh / Ipswich Fringe, residential development at Trinity Park to the east of Ipswich and 2,000 dwellings at Adastral Park will cumulatively support meeting community housing requirements.

Receptor	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
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. The Sproughton Strategic Employment site allocation (in the Babergh Core Strategy) will cumulatively support economic 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 Sustainable travel / transport (ET1 To improve air quality ET4 To reduce the effects of traffic upon the environment ET6 To limit and adapt to climate change ER6 To encourage efficient patterns of movement in support of economic growth)	Positive / Negative	<p>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 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). In addition, housing development on the edge of but outside of Ipswich Borough may also contribute to increased movements into Ipswich and associated effects upon sustainable travel. 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. All new development across the borough has the potential to result in a</p>

Receptor	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
ET3 To reduce waste)		cumulative increase in the use of natural resources and waste generation.
Water resources (ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding)	Negative / Positive	New development is likely to place pressure on water resources and increase consumption of water resources. However, there is mitigation suggested within the 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.

Appendix A

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.
<p>ET1 To improve air quality</p>	<p>CS2: -</p>	<p>Medium and Long-term Direct and Indirect Reversible Medium / Low Certainty</p>	<p>Borough wide and neighbouring authorities Notably central Ipswich including AQMAs</p>	<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 guidance in the SPD, Policy CS5, DM17 and the Travel Ipswich Scheme. When working with neighbouring</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>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 upon the environment	CS2: -	Medium and Long-term Direct and Indirect Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	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 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	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 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

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>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>	of Ipswich's housing need.
<p>ET5 To improve access to key services for all sectors of the population</p>	CS2: +	<p>Short, Medium and Long-term Direct / Indirect Reversible Medium / Low Certainty</p>	<p>Borough wide and neighbouring authorities</p>	<p>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 which would also serve to provide support for community development. The policy also seeks to distribute areas of open space throughout Ipswich which is connected to ecological networks and green corridors which again would 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</p>	<p>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 green infrastructure than the alternative.</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.
				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.	
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> <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</i></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><i>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 assessed.</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>
<p>ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs</p>	<p>CS2: +/-</p>	<p>Short, Medium and Long-term Direct Reversible Medium / Low Certainty</p>	<p>Borough wide and neighbouring authorities</p>	<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</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</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.
and SACs				<p>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 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>	neighbouring authorities contain a SPAs Ramsar sites, SSSIs etc which would be protected by this approach.
ET9 To conserve and where appropriate enhance areas and sites of historical	CS2: -	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	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	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. As the location of new homes in neighbouring authorities is unknown it is difficult to directly compare the proposed CS2

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.
importance				<p>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 outside the borough are unknown.</p>	and this alternative option.
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</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>

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>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>HW1 To improve the health of those most in need</p>	<p>CS2: +</p>	<p>Medium and Long-term Direct Reversible Medium / Low Certainty</p>	<p>Borough wide and neighbouring authorities</p>	<p>The policy seeks to promote the use of sustainable modes of transport (i.e. walking, cycling or using public transport) 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>	<p>An increase in density would result in a reduction in the amount of open space and green infrastructure that could be incorporated into new development which could mean reduced health and wellbeing benefits.</p>
<p>HW2 To improve the</p>	<p>CS2: +/-</p>	<p>Short, Medium and Long-term</p>	<p>Borough wide and</p>	<p>New development is likely to add to current noise and light pollution, particularly on large greenfield sites such as the</p>	<p>Securing a higher density of new homes within the housing sites may increase noise complaints as there would be</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.
quality of life where people live and encourage community participation		Direct Reversible Medium / Low Certainty	neighbouring authorities	<p>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>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>
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. It would also provide support for community development which would promote wellbeing and social inclusion.</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</p>	<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.</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.
				new housing in neighbouring authorities required to meet the need of Ipswich's residents is currently unknown.	
ER2 To offer everybody the opportunity for rewarding and satisfying employment	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 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>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 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</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>

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.
				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.	
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS2: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	The policy 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 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.	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 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	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.

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.
				affect town, district and local centres outside the borough.	
ER6 To encourage efficient patterns of movement in support of economic growth	CS2: +	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>The policy seeks to promote growth across Ipswich which may contribute to ensuring there is sufficient land available for business start-ups.</p> <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>The alternative would perform in a similar way to the Proposed CS2. In addition, higher densities near employment areas may help economic growth through 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	CS2: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	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	<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</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.
inward investment				<p>environment, promoting the development of multi-functional green infrastructure in urban areas and providing educational 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>	proportion of Ipswich's housing needs elsewhere if not around the borough boundary.
<p>CL1 To maintain and improve access to education and skills for both young people and adults</p>	CS2: +	<p>Short, Medium and Long-term Indirect / Direct Reversible Medium / Low Certainty</p>	Borough wide and neighbouring authorities	<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 and quality	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 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</i></p>
	CS3: +	Direct / Indirect		
	CS4: +	Reversible		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
	CS5: 0	Medium Certainty		<p><i>and function.</i></p> <p>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.</p>
	CS6: +			
ET3 To reduce waste	CS1: +	Short, Medium and Long-term	Borough wide	<p>Policy CS1 makes a commitment to ensuring new development incorporates water efficiency measures which would make positive contributions to this SA Objective.</p> <p>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.</p> <p>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.</p>
	CS3: 0	Indirect / Direct		
	CS4: ++	Reversible		
	CS5: 0	Medium Certainty		
	CS6: 0			
ET4 To reduce the effects of traffic upon the environment	CS1: +	Medium and Long-term	Borough wide	<p>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.</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. The provisions of Policy CS1 could help to mitigate this.</p> <p>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.</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 within Policy CS5 and the Travel Ipswich Scheme.</i></p> <p>Policy CS4 and CS6, protecting the borough's built, historical, natural and geological assets and joint working are unlikely to affect the SA Objective.</p>
	CS3: -	Direct / Indirect		
	CS4: 0	Reversible		
	CS5: +	Medium Certainty		
	CS6: 0			
ET5 To improve access to key	CS1: 0	Short, Medium and Long-term	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>
	CS3: +	Direct / Indirect		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
services for all sectors of the population	CS4: +	Reversible Medium Certainty		<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>
	CS5: ++			
	CS6: +			
ET6 To limit and adapt to climate change	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 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: -	Direct / Indirect		
	CS4: 0	Reversible		
	CS5: +	Medium Certainty		
	CS6: 0			
ET7 To protect and enhance the quality of water features and	CS1: +	Short, Medium and Long-term	Borough wide	<p>Policy CS1 would directly benefit the SA Objective through its commitment to supporting the Ipswich Flood Defence Strategy to manage flood risk with in the borough and through its commitment to ensuring new development incorporates water efficiency measures and SuDS as appropriate.</p> <p>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</p>
	CS3: +/-	Direct		
	CS4: 0	Reversible		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
resources and reduce the risk of flooding	CS5: 0	Medium Certainty		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.
	CS6: 0			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS1: +	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>Policy CS4 would directly benefit this SA Objective as it seeks to conserve the boroughs natural assets. It also requires new development to conserve and enhance local biodiversity, canopy cover and geodiversity interests as well as protected and priority species. The Policy also seeks to protect the boroughs green infrastructure and designate additional Local Nature Reserves.</p> <p><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></p> <p>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.</p>
	CS3: +			
	CS4: ++			
	CS5: +			
	CS6: 0			
ET9 To conserve and where appropriate enhance areas and sites of historical importance	CS1: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>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 seeks the use of planning obligations to secure the enhancement and promotion of the significance of any heritage asset, the maintenance of a list of buildings and other heritage assets of local importance as well as taking steps to reduce the number of heritage assets at risk. 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 Historic England's 2013 'Heritage at Risk Register'.</p> <p>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.</p>
	CS3: +			
	CS4: ++			
	CS5: 0			
	CS6: 0			
ET10 To conserve and enhance	CS1: 0	Short, Medium and Long-term Direct	Borough wide	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
	CS3: +/-			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
the quality and local distinctiveness of landscapes and townscapes	CS4: ++	Reversible Medium Certainty		<p>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. The supporting text clarifies that new development should contribute to local distinctiveness, built form and scale of heritage assets through the use of appropriate design and materials. This policy would help to protect and enhance townscape character and quality across the borough.</p>
	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 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			
ER1 To reduce poverty and	CS1: +	Short, Medium and Long-term Direct	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</p>
	CS3: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
social exclusion	CS4: +	Reversible Medium / Low Certainty		<p>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>
	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, and will begin sooner within the plan period therefore a positive score has been recorded for Policy CS6.</p>
	CS3: +			
	CS4: 0			
	CS5: 0			
	CS6: +			
ER4	CS1: 0	Short, Medium and	Borough wide	CS3 would encourage sustainable economic growth through its commitment to supporting significant regeneration in

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS3: +	Long-term		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.
	CS4: 0	Direct		
	CS5: +	Reversible		
	CS6: 0	Medium Certainty		
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 growth	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> Policies CS1 and CS5 both 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 (over time) reduce vehicle movements.
	CS3: +	Direct		
	CS4: 0	Reversible		
	CS5: +	Medium Certainty		
	CS6: 0			
ER7 To encourage and	CS1: +	Short, Medium and Long-term	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
	CS3: +	Direct		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
accommodate both indigenous and inward investment	CS4: +	Reversible Medium Certainty		people want to live, work and visit.
	CS5: +			
	CS6: +			
CL1 To maintain and improve access to education and skills for both young people and adults	CS1: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	Borough wide	<p>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.</p> <p>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.</p>
	CS3: ++			
	CS4: 0			
	CS5: +			
	CS6: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	CS1: 0	N/A	N/A	<p>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.</p> <p>However, on balance, it is not possible to clearly identify if the policy as a whole would significantly affect crime levels.</p>
	CS3: ?			
	CS4: 0			
	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 Direct / Indirect Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>Under CS7, the 7,229¹ 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.</p> <p>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.</p>
	CS8: 0			
	CS9: 0			
	CS10: -			
	CS11: 0			
	CS12: 0			
ET2	CS7: +/-	Short, Medium and	Borough wide and	Siting approximately a third of the residual housing on previously developed land as per Policy CS7 represents

¹ Note this figure includes the entire Ipswich Garden Suburb, plus other allocations, plus

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To conserve soil resources and quality	CS8: 0	Long-term	neighbouring authorities	<p>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 5,578 required homes (on windfall sites and) within neighbouring authorities would be developed at this stage therefore there remains an element of uncertainty.</p> <p>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.</p>
	CS9: +++	Direct		
	CS10: -	Reversible		
	CS11: +	Medium / Low Certainty		
	CS12: 0			
ET3 To reduce waste	CS7: -	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>The construction of 7,229 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></p> <p>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.</p>
	CS8: 0	Direct		
	CS9: 0	Reversible		
	CS10: -	Medium / Low Certainty		
	CS11: +			
	CS12: 0			
ET4 To reduce the effects of traffic upon the environment	CS7: -	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>Policy CS7 states that 7,229 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 access to the Garden Suburb site via walking, cycling and promoting the use of Westfield Station to help alleviate negative effects. The Council will consider the use of compulsory purchase powers where necessary to enable development and infrastructure which could also help to support the SA Objective. This is reiterated in the Garden Suburb SPD. At this stage the significance of this is uncertain, however anticipated to be negative</p>
	CS8: 0	Direct		
	CS9: 0	Reversible		
	CS10: -	Medium / Low Certainty		
	CS11: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	CS12: 0			<p>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, Sproughton 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>
ET5 To improve access to key services for all sectors of the population	CS7: 0 CS8: 0 CS9: 0 CS10: + CS11: + CS12: 0	Short, Medium and Long-term Direct / Indirect Reversible High / Medium Certainty	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. The Council will consider the use of compulsory purchase powers where necessary to enable development and infrastructure which would also contribute towards improving access to key services.</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>
ET6 To limit and adapt to climate change	CS7: - CS8: 0 CS9: 0 CS10: - CS11: 0 CS12: 0	Medium and Long-term Direct / Indirect Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>Policy CS7 states that 7,229 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 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.</p> <p><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</i></p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
				<i>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: - CS8: 0 CS9: + CS10: - CS11: + CS12: 0	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>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.</p> <p>The Garden Suburb is located on greenfield land which may affect local ground water quality through runoff. 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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS7: +/- CS8: 0 CS9: + CS10: +/- CS11: + CS12: 0	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	Borough wide and neighbouring authorities	<p>The proposed 7,229 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.</p> <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>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
				<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 Habitats Regulations Assessment considered that there is the potential for likely significant 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, in relation to housing growth proposed under policies CS7 and CS10. Effects would relate to recreational disturbance. However, an appropriate assessment was undertaken and mitigation measures set out which would mitigate these effects. These mitigation measures have been incorporated in the Core Strategy where relevant, including the provision of a country park as part of the Ipswich Garden Suburb development. The appropriate assessment therefore concluded that there would be no adverse effect on the integrity of European Sites from the Core Strategy and Policies DPD Review.</p>
ET9 To conserve and where appropriate enhance areas and sites of historical importance	CS7: ? CS8: 0 CS9: 0 CS10: ? CS11: + CS12: 0	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>
ET10 To conserve and enhance the quality and local	CS7: +/- CS8: 0 CS9: +	Short, Medium and Long-term Direct Reversible Medium / Low	Borough wide and neighbouring authorities	<p>Policy CS7 commits to the provision of 7,229 new homes within Ipswich and within the Garden Suburb site (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,</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
distinctiveness of landscapes and townscapes	CS10: -	Certainty		<p>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>
	CS11: +			
	CS12: 0			
HW1 To improve the health of those most in need	CS7: +	Short, Medium and Long-term	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	Direct		
	CS9: 0	Reversible		
	CS10: +/-	Medium / Low Certainty		
	CS11: 0			
	CS12: 0			
HW2 To improve the quality of life where people live and encourage community participation	CS7: +/-	Short, Medium and Long-term	Borough wide and neighbouring authorities	<p>New residential development is likely to add to current noise and light pollution, particularly at the Garden 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. The Council will consider the use of compulsory purchase powers where necessary to enable development and infrastructure, which could also make contributions towards achieving the SA Objective.</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</p>
	CS8: 0	Direct		
	CS9: 0	Reversible		
	CS10: +/-	Medium / Low Certainty		
	CS11: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	CS12: 0			support community cohesion.
ER1 To reduce poverty and social exclusion	CS7: +	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. 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			
	CS9: 0			
	CS10: +			
	CS11: 0			
	CS12: +++			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	CS7: 0	Short, Medium and Long-term Direct Reversible Medium Certainty	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			
	CS9: 0			
	CS10: +			
	CS11: 0			
	CS12: 0			
ER3 To help meet the housing requirements for the whole	CS7: ++	Short, Medium and Long-term Direct Reversible Medium / Low	Borough wide and neighbouring authorities	<p>The provision of 7,229 new homes (Policy CS7) in the borough, including a significant 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</p>
	CS8: +			
	CS9: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
community	CS10: ++	Certainty		<p>(Policy CS12).</p> <p>New gypsy and traveller pitch provision (Policy CS11) would also ensure all sectors of society are catered for with regards to housing requirements.</p> <p>There remains an element of uncertainty as the location of new housing in neighbouring authorities is currently unknown.</p> <p>It is also noted that under CS10 the Council will consider using its compulsory purchase powers, where necessary, in order to enable comprehensive development and infrastructure delivery to take place which could contribute positively to enabling growth.</p>
	CS11: ++			
	CS12: ++			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS7: +	Short, Medium and Long-term	Garden Suburb	<p>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.</p> <p>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. It is also noted that the Council will consider using its compulsory purchase powers, where necessary, in order to enable comprehensive development and infrastructure delivery to take place which could contribute positively to enabling growth.</p>
	CS8: 0	Direct		
	CS9: 0	Reversible		
	CS10: +	Medium Certainty		
	CS11: 0			
	CS12: 0			
ER5 To support vital and viable town, district and local centres	CS7: +	Short, Medium and Long-term	Garden Suburb	<p>It is considered that the influx of new residents in Ipswich associated with Policy CS7 would have a positive effect on existing town and district centres. Therefore effects have been assessed as positive.</p> <p>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.</p>
	CS8: 0	Direct		
	CS9: 0	Reversible		
	CS10: +	Medium Certainty		
	CS11: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	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			
	CS12: 0			
ER7 To encourage and accommodate both indigenous and inward investment	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 place people want to live, work and visit.
	CS8: 0			
	CS9: 0			
	CS10: +			
	CS11: 0			
	CS12: 0			
CL1	CS7: 0	Medium and Long-	Garden Suburb	The implementation of Policy CS10 has the potential to improve educational attainment through the provision of

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To maintain and improve access to education and skills for both young people and adults	CS8: 0	term Direct / Indirect Reversible Low Certainty		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.
	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				
CS12: 0				

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 To conserve and where appropriate enhance areas and sites of historical importance	CS13: ? CS14: ?	Short, Medium and Long-term Direct / Indirect Reversible Medium Certainty	Largely within the town centre and Garden Suburb.	<p>Effects were recorded as uncertain as whilst no known heritage assets are anticipated to be directly 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.</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	CS13: +/-	Short, Medium and Long-term	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>
	CS14: +/-	Direct / Indirect Reversible Medium Certainty		
HW1 To improve the health of those most in need	CS13: +	Medium and Long-term	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.
	CS14: +	Indirect Reversible Low Certainty		
HW2 To improve the quality of life where people live and encourage community participation	CS13: +	Medium and Long-term	Town Centre	The policies may indirectly contribute to the achievement of the SA Objective through supporting 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.
	CS14: +	Indirect Reversible Low Certainty		
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		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
		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 To help meet the housing requirements for the whole community	CS13: 0	N/A	N/A	There is no clear link between the Policies and the SA Objective.
	CS14: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	CS13: ++	Short, Medium and Long-term	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.
	CS14: +	Direct Reversible Medium Certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ER5 To support vital and viable town, district and local centres	CS13: +	Short, Medium and Long-term	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.
	CS14: ++	Direct Reversible Medium Certainty		
ER6 To encourage efficient patterns of movement in support of economic growth	CS13: +	Short, Medium and Long-term	Town Centre	Policies CS13 and CS14 seek to ensure sufficient land, buildings and premises are available to 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>
	CS14: +	Direct Reversible Medium Certainty		
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 through 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	CS13: +	Medium and Long-	Borough wide	The implementation of Policies CS13 and CS14 have the potential to improve educational

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
To maintain and improve access to education and skills for both young people and adults	CS14: +	term Direct / Indirect Reversible Low certainty		attainment through the strategic provision of new schools and create new opportunities to improve skills therefore effects have been assessed as positive.
CD1 To minimise potential opportunities for crime and anti-social activity	CS13: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	CS14: 0			

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. The Policy also seeks to support measures to facilitate cycling and walking in the borough as detailed through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document (Policy SP15). Support for such measures could encourage more people to use sustainable travel modes and could make partial contributions towards achieving the SA Objective.</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	<p>The development of the flood barrier would enable use of previously developed land within the town centre, therefore positive effects have been recorded against Policy CS18.</p>
	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. Policy CS20 would also encourage walking and cycling as it seeks to support measures to facilitate cycling and walking in the borough and would therefore make partial contributions in reducing traffic and its effects on the environment. 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 population	CS17: +	Medium and Long-term	Borough wide	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. The Policy also seeks to support further measures to facilitate walking and cycling within the borough.
	CS18: 0	Direct / Indirect	Island site	
	CS19: +	Reversible	Waterfront and town centre	
	CS20: ++	High certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
ET6 To limit and adapt to climate change	CS17: +	Medium and Long-term Direct / Indirect Reversible	Waterfront Island Site	<p>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.</p> <p>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.</p>
	CS18: +			
	CS19: +			
	CS20: +			
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	CS17: +	Medium and Long-term Direct Reversible Medium certainty	Borough wide Waterfront Island Site	<p>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.</p>
	CS18: ++			
	CS19: 0			
	CS20: 0			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	CS17: +	Long-term Direct / Indirect Reversible Medium certainty	Borough wide	<p>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 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. The Policy also states that the Council will seek contributions to ensure that mitigation measures identified in the Habitats Regulations Assessment (HRA) can be addressed, including for any measures not classified as infrastructure, which will contribute further towards conserving and enhancing biodiversity particularly in respect of European protected sites.</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>
	CS18: 0			
	CS19: 0			
	CS20: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
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 Historic England's '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. The provision of a Country Park or similar high quality provision to the north of Ipswich as part of mitigation derived from the HRA in order to ensure that potential impacts of increased recreational disturbance within Special Protection Areas and Special Areas of Conservation within and outside of Ipswich Borough would also contribute towards conserving and enhancing the quality and local distinctiveness of landscapes and townscapes. 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 other policies in the Core Strategy.</p>
	CS18: 0	Direct		
	CS19: -	Reversible		
	CS20: -	Medium certainty		
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</p>
	CS18: +	Direct / Indirect		
	CS19: +++	Reversible		
	CS20: +	Low certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
				benefit people's health and wellbeing.
HW2 To improve the quality of life where people live and encourage community participation	CS17: +	Medium and Long-term	Borough wide	On the whole the quality of life will be improved through 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.
	CS18: +	Direct / Indirect		
	CS19: 0	Reversible		
	CS20: +	Medium certainty		
ER1 To reduce poverty and social exclusion	CS17: +	Medium and Long-term	Borough wide	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.
	CS18: 0	Indirect		
	CS19: 0	Reversible		
	CS20: +	Low certainty		
ER2 To offer everybody the opportunity for rewarding and	CS17: 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.
	CS18: 0			
	CS19: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
satisfying employment	CS20: 0			
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 levels of prosperity and economic growth throughout the plan area	CS17: + CS18: + CS19: 0 CS20: +	Medium and Long-term Indirect Reversible Medium certainty	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 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.
ER5 To support vital and viable town, district and local	CS17: + CS18: 0 CS19: 0	Medium and Long-term Direct / Indirect Reversible	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.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
centres	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		
ER7 To encourage and accommodate both indigenous and inward investment	CS17: +	Medium and Long-term	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	Direct / Indirect		
	CS19: 0	Reversible		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
	CS20: +			
CL1 To maintain and improve access to education and skills for both young people and adults	CS17: + CS18: 0 CS19: 0 CS20: 0	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.
CD1 To minimise potential opportunities for crime and anti-social activity	CS17: 0 CS18: 0 CS19: 0 CS20: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.

Appendix B

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	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	Reversible		
	DM3: 0	Indirect		
	DM4: 0	Low certainty		
ET2 To conserve soil resources and quality	DM1: +	Short, Medium, Long-term	Borough wide	The primary focus of Policy DM1 is not to conserve soil quality and structure, however, the BREEAM 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. It is noted that the Code for Sustainable Homes has been withdrawn. Policy DM3's 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	Reversible		
	DM3: +	Direct / Indirect		
	DM4: 0	Medium / Low certainty		
ET3 To reduce waste	DM1: +	Short, Medium, Long-term	Borough wide	Policy DM1 states it will ensure new development meets various standards, including 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	Reversible		
	DM3: 0	Direct / Indirect		
	DM4: 0	Medium certainty		
ET4 To reduce the effects of traffic upon the environment	DM1: +	Medium, Long-term	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 reduce the effects of transport on the environment – however, certainty is low.
	DM2: 0	Reversible		
	DM3: 0	Indirect		
	DM4: 0	Low certainty		
ET5 To improve access to key	DM1: +	Medium, Long-term	Borough wide	Policy DM3 would improve access to open space over the medium to long term through its commitment to ensuring new and existing developments provide adequate amenity space.
	DM2: 0	Reversible		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
services for all sectors of the population	DM3: 0	Direct Medium certainty		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.
	DM4: 0			
ET6 To limit and adapt to climate change	DM1: ++	Short, Medium, Long-term Reversible Direct High certainty	Borough wide	<p>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 new development to achieve reduction in CO2 emissions of 19% below the Target Emission Rate of the 2013 Building Regulations (Part L); requiring new development to meet water efficiency standards of 110 litres/person/day and requiring 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 CO₂ emissions. With the introduction of the Home Quality Mark demonstrating factors including energy use and air quality, the council will seek to encourage applicants to achieve a high rating under the quality mark.</p> <p>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.</p> <p>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.</p>
	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	<p>Policy DM1 through its commitment to promoting sustainable design and construction (BREEAM, CO2 emissions reductions and water efficiency standards) would ensure surface water run-off from new developments is managed through SuDs along with guarding against water pollution.</p> <p>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.</p>
	DM2: 0			
	DM3: 0			
	DM4: ++			
ET8 To conserve and enhance biodiversity and geodiversity,	DM1: +	Short, Medium, Long-term Reversible Indirect Medium / Low	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.
	DM2: ?			
	DM3: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
including favourable conditions on SSSIs, SPAs and SACs	DM4: 0	certainty		Decentralised renewable and low carbon energy schemes (Policy DM2) have the potential to impact on biodiversity. 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 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 To improve the quality of life	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>
where people live and encourage community participation	DM3: 0			
	DM4: 0			
ER1 To reduce poverty and social exclusion	DM1: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM1: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ER3 To help meet the housing requirements for the whole community	DM1: +	Short, Medium, Long-term	Borough wide	Although the focus of Policy DM1 is not to provide new homes, its commitment to ensuring new build residential development achieves CO2 emissions reduction and water efficiency targets 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.
	DM2: 0	Reversible		
	DM3: 0	Indirect		
	DM4: 0	Medium / Low certainty		
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM1: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM2: 0			
	DM3: 0			
	DM4: 0			
ER5 To support vital and viable town, district and local centres	DM1: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM2: 0			
	DM3: 0			
	DM4: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
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 CO2 emissions reduction and water efficiency targets 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 amounts of waste going to landfill. In addition, the policy would ensure the layout of new
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
				development makes adequate provision for the recycling of waste materials.
ET4 To reduce the effects of traffic upon the environment	DM5: +	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: 0			
	DM8: 0			
	DM9: 0			
	DM10: 0			
ET5 To improve access to key services for all sectors of the population	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			
ET6 To limit and adapt to climate change	DM5: +	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: 0			
	DM8: 0			
	DM9: 0			
	DM10: +			
ET7 To protect and enhance the	DM5: +	Medium and Long term Reversible	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
	DM6: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
quality of water features and resources and reduce the risk of flooding	DM8: 0	Indirect Low certainty		slower run-off times for water compared to hard urban surfaces.
	DM9: 0			
	DM10: 0			
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM5: +	Short, Medium and Long term Reversible Direct / Indirect Medium / Low certainty	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: 0			
	DM8: +			
	DM9: 0			
	DM10: ++			
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM5: +	Short, Medium and Long term Reversible Direct / Indirect Medium certainty	Borough wide	<p>The conservation and enhancement of heritage assets and sites of historical importance including Scheduled Monuments, scheduled parks and gardens and other remains of national importance and their settings 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. The Policy also states that the Council will resist the demolition or partial demolition of both designated and undesignated heritage assets</p> <p>Policy DM5 would benefit the SA Objective as it seeks to protect and enhance the distinctiveness of Ipswich including the setting of any nearby listed buildings.</p> <p>Policies 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</p>
	DM6: +			
	DM8: ++			
	DM9: +			
	DM10: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
				promoting high quality design, all of which would help to protect the historic character of the urban areas. Policy DM6 in particular also seeks to ensure that the design of proposed buildings addresses the potential effect of the building to listed buildings and other heritage assets.
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM5: + DM6: + DM8: + DM9: ++ DM10: +	Short, Medium and Long term Reversible Direct / Indirect Medium certainty	Borough wide	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. 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. 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. Policy DM8 would benefit townscape character in particular through the policy's commitment to protecting conservation areas. Policy DM10 would benefit the SA Objective through its commitment to protecting urban greening – this would only benefit local townscape.
HW1 To improve the health of those most in need	DM5: + DM6: 0 DM8: 0 DM9: 0 DM10: 0	Medium and Long term Reversible Indirect Medium certainty	Borough wide	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. In addition, the introduction of new optional Building Standards for accessible and adaptable dwellings and wheelchair user dwellings would make contributions towards improving the health of those most in need. 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.
HW2 To improve the quality of life where people live and	DM5: + DM6: 0 DM8: 0	Medium and Long term Reversible Indirect	Borough wide	The policy reflects the introduction of new optional Building Regulations standards for accessible and adaptable dwellings and wheelchair user dwellings. The provision of these dwellings would contribute towards improving the

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
encourage community participation	DM9: 0 DM10: 0	Medium certainty		quality of life where people live.
ER1 To reduce poverty and social exclusion	DM5: 0 DM6: 0 DM8: 0 DM9: 0 DM10: 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	DM5: 0 DM6: 0 DM8: 0 DM9: 0 DM10: 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	DM5: + DM6: 0 DM8: 0 DM9: 0 DM10: 0	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. The Policy requires new residential development of 10 or more dwellings to be built to standard M4(2) and new development where affordable housing is provided to build a proportion of the dwellings to Building Regulations standard M4(3) as part of the affordable housing provision which will help to meet housing requirement needs for the whole of the community. The new optional Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings will also help in complying with housing requirements which supports the SA Objective.
ER4 To achieve sustainable	DM5: 0 DM6: 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
levels of prosperity and economic growth throughout the plan area	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			
	DM10: 0			
ER6 To encourage efficient patterns of movement in support of economic growth	DM5: +	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.
	DM6: 0			
	DM8: 0			
	DM9: 0			
	DM10: 0			
ER7 To encourage and accommodate both indigenous and inward investment	DM5: +	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.
	DM6: +			
	DM8: 0			
	DM9: +			
	DM10: +			
CL1 To maintain and improve	DM5: 0	N/A	N/A	There is no clear relationship between the policies and the SA Objective.
	DM6: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary Mitigation / Enhancement Measures
access to education and skills for both young people and adults	DM8: 0			
	DM9: 0			
	DM10: 0			
CD1 To minimise potential opportunities for crime and anti-social activity	DM5: +	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 crime deprivation is high.
	DM6: 0			
	DM8: 0			
	DM9: 0			
	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	<p>Policies DM12 and DM13 would result in very minor localised development, however, this is very unlikely to affect air quality to any significant degree.</p> <p>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.</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>
	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	<p>It is unlikely that the Policies DM12 and DM24 would offer any significant effects to the SA Objective.</p> <p>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.</p> <p>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.</p> <p>A positive score has been recorded for DM14 as the sub-division of family homes is better for land resources than building additional homes.</p>
	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>
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 movements to the same degree. It is worth noting, mitigation to increase sustainable travel is provided in Policy CS5. Infill development as per Policy DM13 may result in a

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				<p>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 appropriate enhance areas and sites of historical importance	DM12: 0 DM13: + DM14: + DM24: 0 DM30: ?	Short, Medium and Long term Reversible Indirect Medium certainty	Borough wide	<p>Policies DM13 and DM14 seek to protect the setting of existing buildings and ensure listed buildings / conservation areas are protected against 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</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				that includes green infrastructure -both of which may offer benefits to the setting of heritage assets. 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.
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	DM12: +	Short, Medium and Long term Reversible Indirect Medium certainty	Borough wide	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. 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. 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.
	DM13: +			
	DM14: +			
	DM24: +			
	DM30: +			
HW1 To improve the health of those most in need	DM12: 0	Medium and Long term Reversible Indirect Low certainty	Borough wide	Policy DM24 relates to the design and integration of affordable homes which would offer health benefits.
	DM13: 0			
	DM14: 0			
	DM24: +			
	DM30: 0			
HW2 To improve the quality of life where people live and encourage community participation	DM12: +	Medium and Long term Reversible Indirect Medium certainty	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: +			
	DM14: +			
	DM24: 0			
	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
	DM13: 0			
	DM14: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
	DM24: + DM30: 0			occupancy dwellings is essential for some on low incomes.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	DM12: 0 DM13: 0 DM14: 0 DM24: 0 DM30: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
ER3 To help meet the housing requirements for the whole community	DM12: ++ DM13: ++ DM14: ++ DM24: ++ DM30: ++	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.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM12: 0 DM13: 0 DM14: 0 DM24: 0 DM30: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
ER5 To support vital and viable town, district and local centres	DM12: 0 DM13: 0 DM14: 0 DM24: + DM30: +	Medium and Long term Reversible Indirect Medium certainty	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 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.
ER6 To encourage efficient patterns of movement in	DM12: 0 DM13: 0 DM14: 0	Medium and Long term Reversible Indirect	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.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
support of economic growth	DM24: 0	Medium certainty		
	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, public transport and the Public Rights of Way (PRoW) network) 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, public transport and the PRoW network) 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 population	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 maintains / improves access to essential services and
	DM18: +	Direct Reversible Medium Certainty		

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				facilities.
ET6 To limit and adapt to climate change	DM17: + DM18: +	Medium and Long-term Direct / Indirect Reversible Medium Certainty	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, public transport and the PRow network) 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.
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	DM17: 0 DM18: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	DM17: 0 DM18: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM17: 0 DM18: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
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. In addition, the Public Rights of Way network provides opportunities for physical recreation and is a means of promoting mental and physical health. 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.
CL1	DM17: 0	N/A	N/A	It is unlikely the policies would have any significant

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

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. However the Policy may also make partial positive contributions to achieving the SA Objective as the Policy, where compatible with adjacent land uses, seeks to provide waste facilities within employment land which could also contribute to increasing recycling. 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

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				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.
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 of 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>
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.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
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.
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.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
ER3 To help meet the housing requirements for the whole community	DM25: +/-	N/A	N/A	The policy clarifies the way in which the Government's starter homes policy will be applied in relation to DM25 which could have both positive and negative effects upon meeting housing requirements as the focus of DM25 is upon protecting employment land.
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. The Policy also sets out criteria by which starter homes would be considered within Employment Areas in conjunction with the introduction of the Governments Starter Homes policy.
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 indirectly encourage people to access employment via sustainable modes of transport, which would benefit this SA Objective.

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
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.

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. In addition the Policy also seeks to permit countryside housing development that re-uses disused buildings which supports the conservation of soil resources.
	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	DM31: 0	Short, Medium and Long-term Direct / Indirect	Ipswich Green Corridors and ecological	The establishment and enhancement of green corridors and ecological networks as outlined within Policies DM31 and DM33 could increase connectivity
	DM33: +			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
services for all sectors of the population	DM34: +	Reversible Medium Certainty	networks along with the countryside.	and accessibility to key services within the borough. Policy DM33 in particular seeks to provide green corridors with recreational, amenity and transport 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 including Europeans sites and SSSIs. The Policy in particular makes a requirement for development to conserve the nature conservation and geodiversity interest of County Wildlife Sites, RIGS and County Geological Sites. In addition, it also states that where possible enhancements for protected sites and protected and priority species will be expected. The Policy also makes specific provision for the protection of European sites that mirrors the Habitats Directive and states that in some instances developer contributions may be sought in relation to mitigation measures. 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

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				<p>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></p> <p>Policy DM33 supports the SA Objective as it seeks to establish and enhance green corridors within Ipswich which would provide vital connections between habitats for use by wildlife.</p> <p>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 in exceptional circumstances and in accordance with NPPF paragraph 116, 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.</p>
ET9 To conserve and where appropriate enhance areas and sites of historical importance	DM31: 0 DM33: 0 DM34: +	N/A	N/A	<p>Policy DM34 would make positive contributions to the SA Objective as in the case of new housing, it seeks to permit development that is required to secure the future of a heritage asset.</p> <p>There is no clear link between Policy DM31 and Policy DM33 and the SA Objective.</p>
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	<p>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.</p> <p>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.</p> <p>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</p>

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
				<p>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. DM34 also contains specific reference to conserving the landscape and scenic beauty of the AONB.</p> <p>In addition, in the case of new housing development, Policy DM34 seeks to permit countryside housing development that re-uses disused buildings and enhances the immediate setting or is of exceptional and innovative design which would contribute to conserving and enhancing quality and distinctiveness within the countryside.</p>
HW1 To improve the health of those most in need	DM31: +	Short, Medium and Long-term	Borough wide	Policies DM31, DM33 and DM34 may contribute 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.
	DM33: ++	Indirect		
	DM34: +	Reversible Low Certainty		
HW2 To improve the quality of life where people live and encourage community participation	DM31: +	Short, Medium and Long-term	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: +	Indirect		
	DM34: +	Reversible Low Certainty		
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	DM31: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
	DM33: 0			

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
requirements for the whole community	DM34: 0			
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	DM31: 0 DM33: 0 DM34: +	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.
ER5 To support vital and viable town, district and local centres	DM31: 0 DM33: 0 DM34: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
ER6 To encourage efficient patterns of movement in support of economic growth	DM31: 0 DM33: 0 DM34: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
ER7 To encourage and accommodate both indigenous and inward investment	DM31: + DM33: + DM34: 0	Short, Medium and Long-term Direct Reversible Medium / Low Certainty	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.
CL1 To maintain and improve access to education and skills for both young people and adults	DM31: 0 DM33: 0 DM34: 0	N/A	N/A	There is no clear link between the policies and the SA Objective.
CD1	DM31: 0	Short, Medium and	Borough wide	Through Policies DM33 the Council would establish

SA Objective	Performance of policy	Temporal scale Permanency Certainty	Geographical extent	Commentary <i>Mitigation / Enhancement Measures</i>
To minimise potential opportunities for crime and anti-social activity	DM33: +	Long-term Indirect		attractive green links which provide public access wherever safe and practicable which would contribute towards minimising opportunities for crime and anti-social behaviour.
	DM34: 0	Reversible Medium Certainty		

Appendix C

Pre-Submission Additional Modifications Table

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
Throughout	Change references to English Heritage to Historic England.	To reflect change in title.	Editorial update	Reference to English Heritage has been changed to Historic England throughout the SA.
Throughout	Change references to the Highways Agency to Highways England.	To reflect change in title.	Editorial update	The SA has been reviewed and does not contain reference to the Highways Agency therefore no further action is required.
CHAPTER 1				
Diagram 1 Context for the Ipswich Local Plan	Add reference to Ipswich Central's 'Ipswich Vision'.	For completeness – the Council signed up to the vision in July 2015.	Editorial update	This modification has not resulted in any changes to the SA.
CHAPTER 2				
2.1	Amend second sentence as follows: 'The national approach to planning policy matters is set out <u>principally</u> in the National Planning Policy Framework (NPPF), <u>but also within documents covering specific topics such as the Marine Policy Statement and Planning Policy for Travellers Sites.</u> '.	To clarify that there are other national planning policy documents.	Marine Management Organisation	The modification clarifies that the national approach to planning policy matters is set out within the NPPF as well as other national planning policy documents. This modification has not resulted in any changes to the SA.
CHAPTER 5				
5.7	Amend the sentence to read: ' Ipswich <u>Partners have agreed a Greater Ipswich City Deal with the</u> '	For accuracy.	Ben Gummer MP	The modification is intended to provide accuracy to state that partners have agreed a Greater Ipswich City Deal. This modification has not resulted in any changes to the SA.
CHAPTER 6				
6.17	Amend final sentence to read ' <u>Alongside the focus on the central area, the D</u> Delivery <u> of a significant number of homes through a sustainable urban extension on greenfield land at the Ipswich Garden Suburb will also occur during the plan period.</u> '	To clarify that the Ipswich Garden Suburb development represents a significant part of the housing growth set out in the Plan.	CBRE	The additional text ensures this paragraph is consistent with policies in the plan and therefore does not lead to changes in the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
New paragraph to be inserted between existing paragraphs 6.18 and 6.19	<p><u>'In July 2015 a non-statutory document entitled 'The Vision for Ipswich: East Anglia's Waterfront Town' was published by partners – University Campus Suffolk, New Anglia Local Enterprise Partnership, Suffolk County Council, Ipswich Central, Ipswich Borough Council, Ben Gummer MP and the Ipswich Chamber of Commerce. This Vision brings together the aspirations of the partners on a range of issues and identifies a series of actions for the next few years. Some of these are relevant to the Local Plan and others are not, because they relate to matters beyond the remit of the planning system (e.g. starting works on the I-Am Project around the Museum on High Street). The two documents (the statutory 'Local Plan' and the 'Vision for Ipswich') are considered to complement each other in a helpful way.'</u></p>	For completeness.	Editorial update	The additional paragraph is for completeness and does not change the SA.
CHAPTER 8				
CS1 SUSTAINABLE DEVELOPMENT – CLIMATE CHANGE				
CS1/para 8.13	<p>Delete:</p> <p>The Government continues to work towards the target of achieving zero carbon homes by 2016. A zero carbon home is currently defined as one that delivers zero net carbon over a year from all 'regulated' energy uses which includes heating, hot water, lighting and fixed appliances. The Government is proposing to implement this through setting greater minimum standards for energy efficiency in the Building Regulations which would operate in tandem with 'allowable solutions' whereby developers can select to</p>	<p>To reflect the Government's statement contained within the Fixing the Foundations paper (HM Treasury, July 2015) which states that:</p> <p>'The government does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards, but will keep energy efficiency standards under review, recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.'</p>	Editorial update	The SA has been reviewed and does not contain reference to the Government's zero carbon homes target therefore no further action is required.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p>either incorporate greater efficiencies in the building's fabric, deliver on or off site renewable energy or provide a financial contribution to renewable energy projects elsewhere, or provide a mix of these measures. Ipswich is planning for high levels of housing and employment growth by 2031. This represents a vital opportunity to ensure that this significant addition to the building stock of the Borough minimises its impacts on climate change. Non-residential buildings also offer the opportunity to save emissions and the Government maintains a commitment for non-residential development to be carbon neutral by 2019.</p>	<p>An explanation to this effect is proposed to be incorporated in revised supporting text to DM1.</p>		
CS1/para 8.14	<p>Amend as follows: Policy DM1 in Part C of this document provides more detail as to how sustainable buildings can be delivered in Ipswich through the <u>Code for Sustainable Homes standards for energy and water use</u> for residential development, and BREEAM ratings for non-residential development, in advance of any further Government measures. The Plan is not prescriptive about how developers should achieve these targets. There is a significant amount of existing advice available about sustainable construction.</p>	<p>To reflect the Government's statement contained within the Fixing the Foundations paper as referred to above.</p>	Editorial update	<p>The SA has been reviewed and amended appropriately to remove reference to the Code for Sustainable Homes and the addition of standards for energy and water use.</p>
CS1/para 8.16	Amend as follows:	To reflect the Government's statement	Editorial update	The editorial update reflects the

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p>‘The National Planning Policy Framework states that Local Authorities should recognise that it is the responsibility of all communities to contribute to energy generation from renewable or low carbon sources, and that they should have a positive strategy to promote energy from renewable and low carbon sources. The Planning and Energy Act 2008 also allows local planning authorities to adopt policies which require developers to meet a proportion of their energy requirements from renewable or low carbon sources, and this is taken forward through policy DM2. The National Planning Policy Framework requires local planning authorities to support the move to a low carbon future and when setting any local requirements for a building’s sustainability, to do so in a way consistent with the Government’s zero carbon buildings policy and adopted nationally described standards. Policies should be designed to maximise renewable and low carbon energy generation whilst addressing any adverse impacts satisfactorily, including cumulative landscape and visual impacts. Implementation of this policy will help to make a significant impact on reducing carbon emissions because buildings are a major source of emissions in Ipswich, in advance of the zero carbon buildings programme taking effect. Funding</p>	<p>contained within the Fixing the Foundations paper as referred to above.</p>	<p>Mersea Homes</p>	<p>Government’s statement by removing reference to the zero carbon buildings programme and does not change the SA.</p>

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	streams such as the Feed in Tariff and Renewable Heat Incentive will be promoted to increase the addition of micro-generation equipment on private properties and Borough owned properties will also be equipped with micro-generation equipment where possible. Add new sentence after ‘...programme taking effect. Once the zero carbon dwellings and zero carbon buildings programmes are in place the Council will reconsider the relevance of the requirements of Policy DM2. ’			
CS2 THE LOCATION AND NATURE OF DEVELOPMENT				
CS2/para 8.31	Amend 2024 to 2025 ‘Later in the plan period after 2024 2025, the ...’	To reflect the updated baseline to 1 st April 2015.	Editorial update	The amendment is of an editorial nature and does not change the SA.
CS2/para 8.34	Include reference to numbers of District Centres: ‘... in the key diagram are as follows (<u>with reference numbers for cross reference to the policies map</u>): ...’	For ease of cross reference.	Editorial update.	The amendment is of an editorial nature and does not change the SA.
CS4 PROTECTING OUR ASSETS				
CS4/para 8.42	There are now 20 County Wildlife Sites within the Borough. The 20 sites are: Bourne Bridge Grassland, Alderman Canal, Holywells Park & Canal, Landseer Park Carr, Pipers Vale, Ransomes Industrial Park Road Verges, River Gipping (Ipswich), River Orwell (Ipswich), Rushmere Heath, Stoke Park Wood, Volvo / Raeburn Road Site, Ashground Covert and Alder Carr, Wharfedale Road (Ipswich), Ransomes Europark Heathland, Bourne Park Reedbed,	To reflect the current situation.	Editorial update Suffolk County Council	The SA has been reviewed and amended to reflect the additional Count Wildlife Site. Figure 1 Environmental Constraints and Allocations will need to be amended to reflect the additional County Wildlife Site.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p>Braziers Wood & Meadow / Pond Hall Carr, Bridge Wood, Chantry Park Beech Water & Meadow, Dales Road Woodland, Christchurch Park</p> <p>Amend fifth bullet point as follows: 1920 County Wildlife Sites</p> <p>Amend penultimate bullet as follows: An area of archaeological importance for its Anglo-Saxon remains in central Ipswich remains of all periods in the historic core, particularly Anglo-Saxon deposits; and</p>			
CS4/paras 8.45 and 8.50	<p>Add Water Framework Directive to the list of legislation and brief explanation of the Council's responsibilities to 8.50 as follows:</p> <p><u>'The Anglian River Basin Management Plan sets out measures which aim to achieve the water body status objectives and wider objectives of the European Water Framework Directive. The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003 require all public bodies, in exercising their functions so far as affecting a river basin district, have regard to the river basin management plan for that district.'</u></p>	For clarity	Environment Agency	The additional text provides clarity of the Council's responsibilities and does not change the SA.
CS4/para 8.46	<p>Para 8.46 to be amended as follows (insert after 'first listed buildings ...':</p> <p><u>This framework of legislation, guidance and policy currently provides comprehensive protection for the assets. Considering first</u></p>	For clarity	Historic England	The SA has been reviewed and the assessment of CS4 against objective ET10 has been updated to reflect the addition of this supporting text, albeit this does not change the conclusions of the assessment.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p>listed buildings, the council will:</p> <ul style="list-style-type: none"> • <u>Conserve and enhance the significance of the Borough's heritage assets, their setting and wider townscape in accordance with policy DM8;</u> • <u>Require new development to contribute to local distinctiveness, built form and scale of heritage assets through the use of appropriate design and materials;</u> • <u>Require proposals to demonstrate a clear understanding of the significance of the asset and its wider context, and the potential impact of the development on the heritage asset and its context;</u> • <u>Keep under review potential buildings and structures for statutory protection; and</u> • <u>Prepare and review entries for the joint Suffolk LPA Buildings at Risk register.</u> 			
CS4/para 8.52	<p>Add new sentence to the end:</p> <p><u>'There are also large areas of Inshore Marine Special Protection Area extending eastwards from the Suffolk and Essex Coast, which form part of the marine protected area identified in the East Inshore and East Offshore Marine Plan.'</u></p>	To acknowledge these areas of SPA.	Marine Management Organisation	The additional text acknowledges these areas of SPA and does not change the SA.
CS4/para 8.53	<p>Delete: National policy obviates the need for a local policy on this matter.</p> <p>Add to end of paragraph: <u>'An Urban Archaeological Database for Ipswich is to be prepared. The Council will prepare a supplementary planning document to summarise information from the Ipswich Urban Archaeological Database and set out archaeological considerations for new</u></p>	For clarity	Historic England / Suffolk County Council	The amendment provides clarity regarding the preparation of an Archaeological Database for Ipswich and does not change the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<u>developments.'</u>			
CS4/para 8.55	Amend the second sentence of para 8.55 to read – 'Whilst registration offers no additional statutory protection, <u>they are designated heritage assets of considerable significance and an important material consideration in development management.'</u>	For clarity	Historic England	The amendment provides clarity within the supporting text and does not change the SA.
CS6 THE IPSWICH POLICY AREA				
CS6/para 8.68	Add to end of paragraph ' <u>The boundary is currently being reviewed and it is possible that a wider Ipswich Policy Area will be more appropriate. Any new boundary would need to be given statutory weight through the production of future Local Plans.'</u>	To clarify that the boundary is currently being reviewed.	Editorial update	The amendment states the boundary is currently being reviewed and does not change the SA.
CS10 IPSWICH GARDEN SUBURB				
CS10/para 8.102	Amend as follows: 'The Council needs to meet the full, objectively assessed needs for housing in the Borough (National Planning Policy Framework paragraph 47).' <u>'Paragraph 47 of the National Planning Policy Framework states that local planning authorities should 'ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out within this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.'</u>	To address concerns that paragraph 47 was not being correctly referred to.	Northern Fringe Protection Group	The amendment addresses concerns that paragraph 47 of the NPPF was not being correctly referred to and does not change the SA.
CS12 AFFORDABLE HOUSING				
CS12	Add new paragraph to explain how 'by total floorspace' will be calculated, as follows: <u>'The affordable housing floorspace requirement will be calculated by applying the</u>	To clarify how the policy will be applied.	Homes Builders' Federation	The amendment provides clarity of how the policy will be applied and does not change the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<u>relevant percentage to the total floorspace of dwellings to be provided.</u>			
CS13 PLANNING FOR JOBS GROWTH				
CS13/para 8.137	Amend reference to Plan for Growth to read Strategic Economic Plan. '... Local Enterprise Partnership Plan for Growth Strategic Economic Plan.'	The LEP's draft Plan for Growth was superseded by the Strategic Economic Plan.	Editorial update.	The amendment is of an editorial nature and does not change the SA.
CS18 STRATEGIC FLOOD DEFENCE				
CS18/para 8.186	Amend 8.186 to read, '... unlikely to be in place until <u>the end of 2017.</u> '	For accuracy	Environment Agency	The amendment provides accuracy within the supporting text and does not change the SA.
CS18/para 8.188	Add to end of paragraph: ' <u>As Ipswich Borough Council falls within a neighbouring reporting area, any climate change mitigation measures should reference policy CC1 within the East Offshore and East Inshore Marine Plans.</u> '	For completeness	Marine Management Organisation	The modification is for completeness regarding reference to the East Offshore and East Inshore Marine Plans and does not change the SA.
CS20 KEY TRANSPORT PROPOSALS				
CS20/para 8.201	Add reference to geographical coverage of Travel Ipswich. '... continues to support the Travel Ipswich scheme, <u>which covers the urban area of Ipswich.</u> More details ...'	For clarity	Westerfield Parish Council	The amendment provides clarity regarding the geographical coverage of Travel Ipswich and does not change the SA.
CS20/para 8.209	Add reference to Wet Dock Crossing feasibility study funding after first sentence: ' <u>In March 2015 the New Anglia Local Enterprise obtained funding in order to carry out a feasibility study for the Wet Dock Crossing.</u> '	For completeness.	Ben Gummer MP	The addition of the reference to the Wet Dock crossing feasibility funding study does not change the SA.
CHAPTER 9				
DM1 SUSTAINABLE DESIGN AND CONSTRUCTION				
DM1 Sustainable Design and Construction	Refer to the Housing Quality Mark ' <u>The Building Research Establishment is introducing a Home Quality Mark which is five star rating demonstrating a home's</u>	To reflect the introduction of the Home Quality Mark	Editorial Update	Reference to the Home Quality Mark has been made in the assessment against policy ET6 To limit and adapt to climate

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p><u>performance in terms of a number of factors including energy use, running costs, air quality, noise, accessibility to amenities, fast and secure internet access and the ease of use of the home by the occupants. The Council encourages applicants to consider achieving a high rating under the Housing Quality Mark.</u></p>			<p>change, although this does not change the conclusions of the SA.</p>
DM2 DECENTRALISED RENEWABLE OR LOW CARBON ENERGY				
<p>DM2/paras 9.15, 9.16, 9.18</p>	<p>Amend as follows:</p> <p>9.15 This policy gives effect to Core Strategy policy CS1, which sets a target for achieving renewable or low carbon energy sources in major development. It builds on national policy in the National Planning Policy Framework <u>which states that planning plays a key role in supporting the delivery of renewable and low carbon energy. with the aim being of contributing to the Government's zero carbon economy.</u></p> <p>9.16 Given the acknowledged vulnerability of the region to the effects of climate change and the projected levels of development Ipswich will be required to accommodate, the Council considers it reasonable to require new developments above the given threshold to provide a minimum of 15% of energy demand from renewable or low carbon sources. <u>The Planning and Energy Act 2008 allows planning authorities to require a proportion of</u></p>	<p>To reflect withdrawal of Code for Sustainable Homes and withdrawal of allowable solutions and 2016 energy efficiency standards (see Ministerial Statement March 2015 and Fixing the Foundations, July 2015).</p>	<p>HBF, Mersea Homes, Gladman Homes, CBRE, Crest</p>	<p>Reference to the Code for Sustainable Homes has been removed from the SA.</p>

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p><u>energy used in development in their area to be energy</u></p> <p><u>from renewable or low carbon sources in the locality of the development. – to help achieve national targets of zero carbon homes by 2016 (public sector buildings by 2018 and non residential buildings by 2019).³</u></p> <p>9.18 The policy also provides for some flexibility where it can be clearly demonstrated that achieving the required percentage provision of renewable or low-carbon energy would not be either technically feasible or financially viable in the light of such considerations as site constraints, other planning requirements, development costs, and the prevailing market conditions at the time. In such circumstances the Council may agree to a lower percentage provision being achieved where the introduction of additional energy efficiency measures (i.e. additional to those required under the relevant Code for Sustainable Homes or BREEAM requirements as set out in policy DM1 such as passive house design or other inbuilt energy efficiency measures) to achieve an equivalent reduction in carbon emissions.</p>			

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	† The Government is currently looking at the definition of what zero carbon is.			
DM3 PROVISION OF PRIVATE OUTDOOR AMENITY SPACE IN NEW AND EXISTING DEVELOPMENTS				
DM3/para 9.22	Replace 'rear' with 'private'. 'It is considered that a suitably designed 75 sq. m rearprivate garden should be ...'	For consistency with DM3 which now refers to private garden space rather than rear garden space.	Editorial update	The amendment is of an editorial nature and does not change the SA.
DM8 HERITAGE ASSETS AND CONSERVATION				
DM8/para 9.73	Amend text: <u>'The settlement of Ipswich has developed through Saxon, Medieval and later periods, leaving a legacy of history below ground which tells the complex story of the town's evolution. To ensure that this invaluable and irreplaceable historical, cultural and educational resource is not lost or damaged, the planning process must ensure that development proposals respect archaeologically important sites.'</u> The NPPF sets out specific requirements for assets with archaeological interest. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, developers will be required to submit an appropriate desk based assessment and, where necessary, a field evaluation (which could include geophysical survey, building survey and trenched evaluation) at an appropriate stage prior to determination of an application.	For accuracy	Suffolk County Council	The amendment is of an editorial nature providing accuracy within the supporting text in relation to archaeology and consultation with relevant agencies. It does not change the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p>Scheduled Monuments are designated by the Secretary of State and the records held by English Heritage <u>Historic England</u> who develop policies to protect them. Suffolk County Council Archaeology Service holds the Historic Environment Record for Ipswich and is consulted on planning applications that could affect archaeology. <u>Early consultation with relevant agencies is encouraged well in advance of seeking planning permission, in order that assessment and recording requirements can be discussed. This helps make the application process simpler and reduces the risk of heritage assets presenting an obstacle to delivery at a later stage. Where there is no overriding case for preservation in situ, an appropriate programme of work to record and promote understanding of remains which would be affected by development could include some or all of further evaluation, upfront excavation, and/or monitoring and control of contractor's groundworks, with appropriate curation and publication of results.</u></p>			
DM8/para 9.74	<p>Attention is drawn to the policies maps, which show the Area of Archaeological Importance of the Anglo-Saxon and Medieval town, aspects of which are internationally recognised. Beyond this area, the Borough includes parts of the wider landscape of the Gipping Valley and Orwell Estuary, and there are Prehistoric, Roman, Anglo-Saxon and</p>	For accuracy	Suffolk County Council	The amendment provides accuracy in relation to the Area of Archaeological Importance and does not change the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p>other period archaeological sites within its boundaries. The County Council strongly encourages applicants to contact the archaeological service well in advance of seeking planning permission, in order that assessment and recording requirements can be discussed. This helps make the application process simpler and reduces the risk of heritage assets presenting an obstacle to delivery at a later stage. For information, the Area of Archaeological Importance is also shown on Plan 4.' <u>The Area of Archaeological Importance is defined from evidence of buried archaeology, historic maps and information, standing structures and visual elements of the historic landscape and it highlights the area known or likely to have the most complex and sensitive archaeological deposits. This helps to alert applicants and planning officers to the likely requirements for archaeological investigation, protection and recording to be placed on development, on potentially even the smallest scale below-ground works.</u></p>			
DM9 BUILDINGS OF TOWNSCAPE INTEREST				
DM9/para 9.75	<p>Amend the first sentence of para 9.75 to read:</p> <p>The Council acknowledges the townscape importance of buildings and structures of local interest which have no other statutory protection, and encourages their retention</p>	For completeness	Suffolk Preservation Society	The amendment is of an editorial nature and does not change the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	and upkeep.			
DM10 PROTECTION OF TREES AND HEDGEROWS				
DM10 Protection of Trees and Hedgerows	Amend 'heath' to 'health' in clause g. '... to ensure the heath <u>health</u> and safety of each specimen ...'	To correct a typographical error.	Editorial update	The amendment is a correction of text and does not change the SA.
DM13 SMALL SCALE INFILL AND BACKLAND RESIDENTIAL DEVELOPMENTS				
DM13/para 9.90	Needs to refer to existing or future occupiers. '... and the quality of life of its <u>existing and future</u> inhabitants.'	For clarity.	Editorial update.	The amendment is of an editorial nature and does not change the SA.
DM17 TRANSPORT AND ACCESS IN NEW DEVELOPMENTS				
DM17/para 9.97	Delete reference to Ipswich Transport Strategy. '...In accordance with the Ipswich Transport Strategy 2007 and the Suffolk Local Transport Plan ...'	Superseded by Local Transport Plan 3.	Editorial update.	The amendment is of an editorial nature and does not change the SA.
DM17/para 9.99	Add to the end of 9.99: ' <u>The Public Rights of Way network is more than just a means of reducing vehicular traffic. In addition to connecting areas and providing opportunities for physical recreation and social interaction, it provides vital access to services, facilities and the natural environment. In this sense it is a major recreational resource, economic asset and means of promoting mental and physical health. These benefits must be taken into</u>	To ensure Objective 6 is realised in relation to the Rights of Way network.	Suffolk County Council	This addition has been referenced within the assessment of this policy although does not change the SA score.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<u>account in the design of development along with the contributions it might make to sustainable routes and open space provision. Development which may affect Rights of Way will not be permitted unless it can demonstrate how it protects or enhances the network. Where development cannot avoid detriment to the Rights of Way Network, it should demonstrate how suitable alternative provision will be made.'</u>			
DM20 THE CENTRAL SHOPPING AREA				
DM20/para 9.114	Add to the end of the paragraph: <u>'The Town and Country Planning General Permitted Development Order 2015 introduced new permitted development rights for existing A1 units however the policy remains relevant due to size limitations contained within the new Order.'</u>	To acknowledge the recent changes to the General Permitted Development Order whereby change of use from A1-A3 is now PD but only for units under 150sqm and A1-A2 is also PD.	Editorial update	The amendment acknowledges the recent changes to the GDPO and does not change the SA.
DM21 DISTRICT AND LOCAL CENTRES				
DM21, clause b.	Delete 'Of this 40%' in clause b. <u>'Of this 40%, nNo more than 20% ...'</u>	To clarify that restriction to 20% A5 uses is 20% of the total frontage.	Planware	The amendment clarifies that restriction to 20% A5 uses is 20% of the total frontage and does not change the SA.
DM21	Delete the reference to prominent position (clause c. i.) (and renumber subsequent clauses). 'i. the unit does not occupy a prominent position in the Centre; ii. i. satisfactory vehicular access ... Qualify c. iii. to indicate that this requirement would only apply to a vacant A1 unit. <u>'iii. in the case of a vacant unit, the unit has suffered from ...'</u>	For clarity in relation to community uses in district centres.	Suffolk County Council.	The amendment provides clarity in relation to community uses in district centres and does not change the SA.
DM21/9.123	Include reference to numbers of Local	For ease of cross reference.	Editorial update.	The amendment is of an editorial

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	Centres: 'The local centres are listed below (<u>with reference numbers for cross reference to the policies map</u>): ...'			nature and does not change the SA.
DM21/para 9.129	Add explanatory text to the end of para 9.129 about accessibility (clause f.) outside district and local centres meaning particularly for those without use of a car: ' <u>Accessible under clause f of policy DM21 relates to community facilities being accessible by a range of transport modes including for those without a car.</u> '	For clarity	Editorial update.	The amendment to the clause does not change the SA.
DM28 PROTECTION OF OPEN SPACES, SPORT AND RECREATION FACILITIES				
DM28 Protection of Open Spaces, Sport and Recreation Facilities	Amendment to clause a. of policy: a. ... , as shown by the Ipswich Open Space, Sport and Recreation Facilities Study 2009 and subsequent update as a result of the Council's Open Space and Biodiversity Policy ; or	The Council may commission other updates from time to time as well as the Open Space and Biodiversity Policy, which may also be relevant.	Editorial update.	The amendment to the clause does not change the SA.
DM33 GREEN CORRIDORS				
DM33 Green Corridors and/or Plan 6	Add green rim elements with the borough boundary to Plan 6.	To clarify the location of the green rim	Editorial update.	The amendment provides clarity of the location of the green rim and does no change the SA.
CHAPTER 11 KEY TARGETS ASSOCIATED WITH PART B				
Chapter 11 Objective 6	Add to indicators: ' <u>Mode of travel to work to major employers</u> ' and ' <u>Mode of travel to work (census)</u> ' and delete ' <u>Children travelling to school — mode of travel usually used</u> '.	Travel to school is no longer monitored. Mode of travel to major employers is monitored annually by Suffolk County Council. Whilst Census data is only collected every ten years, it will show long term trends.	Editorial update, Northern Fringe Protection Group and Save Our Country Spaces.	The amendment is of an editorial nature acknowledging that mode of travel to school is no longer monitored and adding mode of travel to work to major employers. It does not change the SA.
Chapter 11 Objective 8	Change the wording of the second indicator to read – ' <u>Number of buildings on the Suffolk</u>	To better monitor impacts on the historic environment.	Historic England	The amendment seeks to better monitor impacts on the historic

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
	<p>Buildings at Risk' register.'</p> <p>Add further indicator as follows:</p> <p><u>'Number of buildings and conservation areas on Historic England Heritage Assets at Risk register.'</u></p> <p>Add Targets as follows:</p> <p><u>'A decrease in the number of Ipswich buildings at risk on the Suffolk Buildings at Risk register or no net increase in Ipswich buildings at risk'</u></p> <p><u>'A decrease in Heritage Assets at risk on the Historic England register or no net increase in Heritage Assets at risk'</u></p>			environment and does not change the SA.
APPENDICES				
APPENDIX 5 Activities or services relevant to each planning standard charge heading	<p>Add sentence :</p> <p><u>'The broad categories of infrastructure to be included in the standard charge are as follows and detailed further in Appendix 5; This does not constitute a precursor to a CIL Regulation 123 List.'</u></p>	For clarity	Suffolk County Council	The amendment is of an editorial nature and does not change the SA.
APPENDIX 6 Ipswich standards for the provision of open space, sport and recreation	<p>Parks and Gardens 1.42ha <u>1.16ha</u> per 1,000 population</p> <p>Amenity Green Space 0.6ha <u>0.48ha</u> per 1000</p>	For accuracy to reflect the evidence.	Editorial	The amendment is of an editorial nature providing accuracy within the open space standards and does not change the SA.

Policy / paragraph	Additional modification	Reason	Objector(s)	Significance to the SA
facilities	population			
MAPS AND PLANS				
Policies Map	Amend Ipswich Garden Suburb allocation – where the link through to Tuddenham Road is shown, the allocation should be shown as a narrower width.	The adjacent plot to the north east now has planning permission for a bungalow.	Editorial	The amendment does not change the SA.
Policies Map	Amend policy reference against countryside designation to read DM34	For clarity	Editorial	The amendment does not change the SA.
Plan 2 Flood Risk	Update to August 2015 to reflect new information received on the areas at risk of flooding (no change in the areas affected within Ipswich).	For clarity.	Editorial	The amendment does not change the SA.
Plan 3 Conservation Areas	Add the Marlborough Road conservation area.	For completeness	Editorial	The amendment does not change the SA.
Plan 6 Green Corridors	Add the indicative Green Rim to link to policy DM33 k.	For clarity	Editorial	The amendment does not change the SA.

Appendix D

Consultation Comments on the Proposed Submission SA Report

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5485	Northern Fringe Protection Group (Mr Brian Samuel) [976]	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	OBJECT	Table 3-2 fails to use the most recent baseline data. Suggested improvements to the objectives and indicators in Table 3-3 have been ignored.	The views and knowledge of Ipswich residents need to be better taken into account by the SA for it to be sound rather than being largely ignored.	Table 3.2 is a summary of the data provided in Appendix B. The most up to date published data has been used. Comments received in relation to Table 2.3 in the Interim SA Report (Dec 2013) (now Table 3-3) are responded to in Appendix C of the Proposed Submission SA Report (Dec 2014).
5498	Northern Fringe Protection Group (Mr Brian Samuel) [976]	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	OBJECT	The SA underestimates the impact of Objective ER3. Uncertainties should not be recorded where there are clearly going to be negative effects. This section needs to reflect the conclusions of the assessment of the plan and the effects of development of the Garden Suburb. The previous comment that there will obviously be an increase in traffic has been ignored, although the response in Appendix C states that it is agreed there is likely to be an effect.		The assessment in 3.2 is an assessment of the SA objectives against each other, without considering any potential effects of the plan. It is agreed that the paragraph in 3.2.4 should have been amended and this is acknowledged in section 4 of the addendum that traffic effects are probable although not inevitable, when considering the compatibility of the SA objectives.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5609	Save Our Country Spaces (Mrs Barbara Robinson) [978]	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	OBJECT	SOCS commented previously (September 2014) in response to IBC's updated SA scoping consultation letter. SOCS feel the responses given to key issues in the letter sent do not address these key issues [the need to incorporate an updated evidence base and give more detailed consideration to alternative spatial options] sufficiently. SOCS reserve the right to continue to question the "evidence base".		The response from SOCS to the September 2014 Scoping Letter is responded in Appendix C of the Proposed Submission SA (Dec 2014). Available and relevant data which lends itself to the strategic assessment of effects relating to air quality has been incorporated within the baseline.
5730	Save Our Country Spaces (Mrs Barbara Robinson) [978]	3.2 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA underestimates the impact of Objective ER3. Uncertainties should not be recorded where there are clearly going to be negative effects. This section needs to reflect the conclusions of the assessment of the plan and the effects of development of the Garden Suburb. The previous comment that there will obviously be an increase in traffic has been ignored, although the response in Appendix C states that it is agreed there is likely to be an effect.		The assessment in 3.2 is an assessment of the SA objectives against each other, without considering any potential effects of the plan. It is agreed that the paragraph in 3.2.4 should have been amended and this is acknowledged in section 4 of the addendum that traffic effects are probable although not inevitable, when considering the compatibility of the SA objectives.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5494	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.1 The Vision	OBJECT	The SA appears to assume that the jobs target applies to Ipswich Borough and takes no account of travel to work to employment sites outside the Borough.	The jobs target needs to be re-appraised.	The jobs figure of in the region of 12,500 in Policy CS13 does relate to Ipswich Borough. The Pre-Submission Main Modifications include an amendment to CS13 for clarity in this respect.
5728	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.1 The Vision	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA appears to assume that the jobs target applies to Ipswich Borough and takes no account of travel to work to employment sites outside the Borough.	The jobs target needs to be re-appraised.	The jobs figure of in the region of 12,500 in Policy CS13 does relate to Ipswich Borough. The Pre-Submission Main Modifications include an amendment to CS13 for clarity in this respect.
5499	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies	OBJECT	Alternatives other than 'do nothing' should be considered, for example co-operating more closely with other local authorities and locating new homes nearer to new sites of employment. The SA does not recognise that delivery of the entire Garden Suburb may not be viable. A jobs led strategy should be considered as an alternative. The alternative of delivering jobs and homes outside of the Borough also needs to be considered, including on the Sugar Beet Factory site. Lack of sustainability may be a reason to not meet housing needs within the Borough.	A wider range of alternatives should be considered including a jobs led strategy, locating homes nearer to new employment sites, co-operating more closely with neighbouring authorities and delivering jobs and homes on the Sugar Beet Factory site.	The Core Strategy must plan for both the homes required and jobs forecast up to 2031. Due to the tightly drawn boundary of Ipswich Borough, all housing sites that are understood to be deliverable and viable up to 2031 have been allocated. Co-operating with neighbouring authorities relates to the process of considering growth outside the boundary which will form part of future work, rather than an alternative to the proposed strategy. The sugar beet factory site is beyond the boundary of the Borough and therefore outside of the scope of this plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5731	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Alternatives other than 'do nothing' should be considered, for example co-operating more closely with other local authorities and locating new homes nearer to new sites of employment. The SA does not recognise that delivery of the entire Garden Suburb may not be viable. A jobs led strategy should be considered as an alternative. The alternative of delivering jobs and homes outside of the Borough also needs to be considered, including on the Sugar Beet Factory site. Lack of sustainability may be a reason to not meet housing needs within the Borough.	A wider range of alternatives should be considered including a jobs led strategy, locating homes nearer to new employment sites, co-operating more closely with neighbouring authorities and delivering jobs and homes on the Sugar Beet Factory site.	The Core Strategy must plan for both the homes required and jobs forecast up to 2031. Due to the tightly drawn boundary of Ipswich Borough, all housing sites that are understood to be deliverable and viable up to 2031 have been allocated. Co-operating with neighbouring authorities relates to the process of considering growth outside the boundary which will form part of future work, rather than an alternative to the proposed strategy. The sugar beet factory site is beyond the boundary of the Borough and therefore outside of the scope of this plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5486	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.1	OBJECT	Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.	The SA needs to assess and consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.	The SA has assessed development at the garden suburb as proposed in CS10. Negative effects have been scored in relation to traffic and air quality, with mitigation measures identified accordingly. Information submitted with a non-determined planning application should not be taken into account in the SA as this only represents the applicant's findings / position. Suffolk County Council's response to the Proposed Submission consultation states that 'Sustainable transport measures will be necessary, along with highway mitigation (as per policies in the Plan)'. There is therefore no indication that the mitigation measures proposed by the SA and contained in the policies in the Core Strategy review will not be sufficient to address transport effects. The traffic modelling is currently being updated and effects on the SA conclusions will be considered prior to Submission of the plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5727	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.1	OBJECT	Endorse NFPG points. Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.	The SA needs to assess and consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues, the conclusions of the transport assessment and resulting air quality impacts submitted with the CBRE application, decreasing air quality, legally binding air quality limits and effects of poor air quality on cycling/walking.	The SA has assessed development at the garden suburb as proposed in CS10. Negative effects have been scored in relation to traffic and air quality, with mitigation measures identified accordingly. Information submitted with a non-determined planning application should not be taken into account in the SA as this only represents the applicant's findings / position. Suffolk County Council's response to the Proposed Submission consultation states that 'Sustainable transport measures will be necessary, along with highway mitigation (as per policies in the Plan)'. There is therefore no indication that the mitigation measures proposed by the SA and contained in the policies in the Core Strategy review will not be sufficient to address transport effects. The traffic modelling is currently being updated and effects on the SA conclusions will be considered prior to Submission of the plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5501	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.2	OBJECT	Joint evidence base documents for the Ipswich Policy Area have not been made available. Jobs targets for the four Ipswich Policy Area authorities are 26% higher than the January 2015 EEFM forecasts and are therefore at risk of being unrealistic. Evidence needs to be provided that the jobs targets will provide sustainability benefits and that the Core Strategies of neighbouring authorities take account of the need to deliver 4,000 extra homes and that the sustainability effects have been assessed. If the jobs target is sustainable why do jobs and homes need to be provided in other authority areas.		Evidence base documents relating to the Ipswich Policy Area are included within the Core Document library, including the Strategic Housing Market Assessment (2012) and Ipswich Housing Market Area Population and Household Projections (2013). The Employment Land Needs Assessment is to be published prior to Submission. The jobs figure relates to Ipswich Borough. The residual housing need will be addressed through future joint or aligned plans.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5612	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.2	OBJECT	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 new SA. This can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring 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 NF will pass through AQMAs and areas of pollution concern as residents travel to work. This approach is required under the Duty to Co-operate.		The traffic modelling is currently being updated and effects on the SA conclusions will be considered prior to Submission of the plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5481	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.3	OBJECT	SA should assess effects of 13,550 homes against evidence illustrating 10,434 are needed. SA should consider effects of multiple starts at the Garden Suburb. Conclusions of CBRE traffic assessment should be considered. SA should assess implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling. The effect on redevelopment through removal of the brownfield land target and multiple starts at the Garden Suburb should be assessed.	The SA needs to assess the effects of delivering 13,550 homes when evidence suggests this should be 10,434. The SA should take account of the change to Table 8B. The SA should recognise the effects identified through the transport assessment submitted with the CBRE application. The removal of the brownfield land target should be better considered in the SA.	The DCLG/ONS Household Projections are trend based and Planning Practice Guidance states that these could be viewed as a starting point when identifying the Objectively Assessed Need. As there is a residual need for 3,778 dwellings to be met through joint working with neighbouring authorities, it is considered highly unlikely that a revised OAN would affect the strategy in the Core Strategy Review in terms of development within Ipswich Borough. The triggers in Table 8B are indicative – the SA has assessed policy CS10 as proposed.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5613	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.3	OBJECT	<p>The adopted CS allows for a phased approach to development of the NF. Its SA judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the NF without locational restrictions. A detailed examination of the implications of this change must be included in the new SA and a full critique of the rationale.</p> <p>Multiple starts may pose the risk that if a developer/landowner hits financial problems, the added burden [of infrastructure provision] falls on remaining landowners/developers, making their operation unviable and halting delivery, resulting in blight. Grampian Conditions are not mentioned within the Scoping report.</p>	<p>A "safety net fund" needs to be arranged and established as mitigation, -reserve matters? - or perhaps Grampian Conditions with front loaded finance ahead of any planning permission being granted and started.</p>	<p>It is not the case that the SA of the adopted Core Strategy judged multiple starts specifically as unsustainable. The SA of CS10 in the Proposed Submission Core Strategy Review reflects the allocation for 3,500 dwellings. More detail as to how this infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development. Pre-Submission Main Modifications to CS10 provide additional security for the development coming forward in a comprehensive manner.</p>

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5597	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.3	OBJECT	SA is not fit for purpose. The adopted CS allows a phased approach to development of the Northern Fringe/IGS and its SA judged multiple starts as unsustainable. The revised CS now allows multi-site development across the NF. A detailed examination of the implications must be included in the new SA and a full critique of the rationale behind the proposed changes. With multiple starts, if one developer hits financial problems, the added burden on remaining developers may make their operation unviable and halt delivery. This would blight the land. What contingency is there if market forces impact on infrastructure delivery?	A "safety net fund" needs to be arranged and established as mitigation or Grampian conditions with front loaded finance ahead of planning permission being granted and started. The Hyder Scoping Report does not mention Grampian Conditions.	It is not the case that the SA of the adopted Core Strategy judged multiple starts specifically as unsustainable. The SA of CS10 in the Proposed Submission Core Strategy Review reflects the allocation for 3,500 dwellings. The Ipswich Garden Suburb SPD Interim Guidance has been produced and adopted as interim guidance, which identifies the infrastructure expected to support the IGS development. More detail as to how this infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development. In order to avoid the problems highlighted in the SOCS response, safeguards to ensure the continued delivery of the developments alongside infrastructure will be a matter to be considered as part of this work. Pre-Submission Main Modifications to CS10 provide additional security for the development coming forward in a comprehensive manner.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5495	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.4	OBJECT	The SA needs to take account of the outputs from the Viability Testing for Ipswich Borough Council report which questions the viability of office, industrial and warehouse development. The jobs figure is based on over-estimated population growth, the SA should take this into account. The viability study challenges the viability of the Westgate site and the SA has not acknowledged this. The SA should recommend measures to improve the retail offer and deliver new jobs. The SA should assess the impact of developing the Sugar Beet Factory site on the delivery of the Core Strategy.	The SA should consider the conclusions of the viability report, assess the implications of the purchase of the Sugar Beet Factory site and recommend measures to improve retail and jobs delivery.	It is not the role of the SA to assess the viability of sites put forward for development. The Sugar Beet Factory site is allocated as a strategic employment site allocation through the Babergh Core Strategy and cumulative effects with other plans and strategies have been considered in section 5 of the SA report and further within this addendum.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5611	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.4	OBJECT	SOCS argued [previously] that IBC's Core Strategy was unsustainable as it was based on unrealistic job targets. The previous SA failed to recognise these concerns. Evidence now shows that the jobs target was unsustainable and the original SA incorrectly assessed the CS as sustainable. A more evidence-based approach to SA is required. We are disappointed that IBC has ditched the employment-led strategy in favour of a housing-led approach. There has been no assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy. The SA needs to consider the implications of this key change.		The SA considers the effects on the sustainability objectives of the strategy to deliver the housing and employment land requirements. It is not the role of the SA to produce alternative evidence. An Employment Land Needs Assessment is currently being produced and the SA findings will be considered against this when it is published.
5502	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.6	OBJECT	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how this infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5732	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.6	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	dwelling. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how this infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5503	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.7	OBJECT	The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should take account of current and future waste water infrastructure capacity and assess the implications of the Country Park being dependent upon delivery of 500 dwellings at Henley Gate.	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.
5496	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.3 Core Strategy Policies, 4.3.7	OBJECT	The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should take account of current and future waste water infrastructure capacity and assess the implications of the Country Park being dependent upon delivery of 500 dwellings at Henley Gate.	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5729	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.7	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should take account of current and future waste water infrastructure capacity and assess the implications of the Country Park being dependent upon delivery of 500 dwellings at Henley Gate.	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.
5733	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.3 Core Strategy Policies, 4.3.7	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA does not take account of lack of capacity for sewage treatment or the waste water issues arising from the expansion of Ipswich. The key waste water infrastructure needed should be specified in the Core Strategy. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be	The SA should take account of current and future waste water infrastructure capacity and assess the implications of the Country Park being dependent upon delivery of 500 dwellings at Henley Gate.	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5504	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.2	OBJECT	delivered before occupation of the first dwelling. DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	DM10 states that existing hedgerows of amenity or biodiversity value should be retained where possible. It is not clear how 'important' would be defined if this is to mean anything other than those with amenity or biodiversity value.
5734	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.2	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	DM10 needs to state that 'important hedgerows' will be protected. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA	DM10 states that existing hedgerows of amenity or biodiversity value should be retained where possible. It is not clear how 'important' would be defined if this is to mean anything other than those with amenity or biodiversity value.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5505	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.4	OBJECT	Pleased that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.	stating the Country Park should be delivered before occupation of the first dwelling. The SA needs to assess and consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.	The SA has assessed development at the garden suburb as proposed in CS10. Negative effects have been scored in relation to traffic and air quality, with mitigation measures identified accordingly. Information submitted with a non-determined planning application should not be taken into account in the SA as this only represents the applicant's findings / position. Suffolk County Council's response to the Proposed Submission consultation states that 'Sustainable transport measures will be necessary, along with highway mitigation (as per policies in the Plan)'. There is therefore no indication that the mitigation measures proposed by the SA and contained in the policies in the Core Strategy review will not be sufficient to address transport effects. The traffic modelling is currently being updated and effects on the SA conclusions will be considered prior to Submission of the plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5735	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.4	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Pleas that the SA recommends updated traffic modelling. The SA does not adequately consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.	The SA needs to assess and consider the effects of multiple starts from the Garden Suburb, the outputs of Suffolk County Council feasibility work into solutions for the road network around the Garden Suburb, the views of the highway authority that sustainable transport measures have not been adequately identified in the current planning application, congestion and capacity issues and the conclusions of the transport assessment.	The SA has assessed development at the garden suburb as proposed in CS10. Negative effects have been scored in relation to traffic and air quality, with mitigation measures identified accordingly. Information submitted with a non-determined planning application should not be taken into account in the SA as this only represents the applicant's findings / position. Suffolk County Council's response to the Proposed Submission consultation states that 'Sustainable transport measures will be necessary, along with highway mitigation (as per policies in the Plan)'. There is therefore no indication that the mitigation measures proposed by the SA and contained in the policies in the Core Strategy review will not be sufficient to address transport effects. The traffic modelling is currently being updated and effects on the SA conclusions will be considered prior to Submission of the plan.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5506	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.6	OBJECT	The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas. It needs to recognise that the employment target relates to the Ipswich Policy Area. The SA underestimates the effects of commuting to new employment sites. The traffic modelling needs to be updated.	The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas and recognise that the employment target relates to the Ipswich Policy Area.	The jobs forecast relates to Ipswich Borough and the Pre-Submission Main Modifications include a change to CS13 to clarify this. Cumulative effects, including with neighbouring authorities' plans are considered in Section 5 of the SA report and further within this addendum. The traffic modelling is being updated and once completed the SA will be revisited to consider whether there are any implications for the SA's conclusions. The SA identifies that there may be negative effects from traffic related to employment uses, but that a policy which did not cluster employment uses together in these locations may in fact lead to greater traffic movements.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5736	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.6	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas. It needs to recognise that the employment target relates to the Ipswich Policy Area. The SA underestimates the effects of commuting to new employment sites. The traffic modelling needs to be updated.	The SA needs to take account of cumulative impacts of traffic from development in neighbouring authority areas and recognise that the employment target relates to the Ipswich Policy Area.	The jobs forecast relates to Ipswich Borough and the Pre-Submission Main Modifications include a change to CS13 to clarify this. Cumulative effects, including with neighbouring authorities' plans are considered in Section 5 of the SA report and further within this addendum. The traffic modelling is being updated and once completed the SA will be revisited to consider whether there are any implications for the SA's conclusions. The SA identifies that there may be negative effects from traffic related to employment uses, but that a policy which did not cluster employment uses together in these locations may in fact lead to greater traffic movements.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5507	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.7	OBJECT	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.
5737	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.7	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The results of the Core Strategy HRA have been reflected more directly in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5508	Northern Fringe Protection Group (Mr Brian Samuel) [976]	4.4 Development Management Policies, 4.4.8	OBJECT	The SA incorrectly states that the Core Strategy makes specific provision for the protection of European sites that mirrors the Habitats Directive as it fails to secure timely delivery of the Country Park to mitigate effects of new development. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The text quoted relates to policy DM31 which does contain specific protection for European sites. The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.
5738	Save Our Country Spaces (Mrs Barbara Robinson) [978]	4.4 Development Management Policies, 4.4.8	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. The SA incorrectly states that the Core Strategy makes specific provision for the protection of European sites that mirrors the Habitats Directive as it fails to secure timely delivery of the Country Park to mitigate effects of new development. The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The SA should assess the implications of Table 8B stating that initial works at the Country Park are dependent upon occupation of 500 dwellings at Henley Gate and should take account of the CBRE HRA stating the Country Park should be delivered before occupation of the first dwelling.	The text quoted relates to policy DM31 which does contain specific protection for European sites. The results of the Core Strategy HRA have been reflected in the SA. Table 8B contains indicative triggers. More detail as to how infrastructure will be funded and delivered, will be set out within an Infrastructure Delivery Plan which would be considered alongside the planning applications and used to secure the necessary contributions at the appropriate points in the development.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5480	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Appendix B - Baseline Data	OBJECT	The best available data has not been used. More recent data on air quality, average weekly wages, sports/open space provision, population and employment is available. Data showing changes in the number of jobs over the years should be included. The most recent DCLG, ONS and EEFM forecasts should be included. The Trend Migration scenario is flawed.		The Council is not aware of the more recent data being referred to in the first sentence. It is not the role of the SA to provide alternative evidence, but to assess the effects of the proposed policies upon the SA objectives.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5610	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Appendix B - Baseline Data	OBJECT	Regarding Air Quality and air Pollution impacts, the SA is totally lacking in capacity to reflect the current situation regarding lack of resource; e.g. lack of data and continuous monitoring within Ipswich from traffic, lack of particulate impacts; lack of progress in responding to emerging health impacts from Air pollution; lack of work and remit within the SA for Cumulative and compound impacts for Ipswich from multiple sources of air pollution i.e. Industrial, biomass, clinical and traffic and also from the crematorium. Also from "chem trails" from overhead aircraft. All in combination from impacts from Europe impacting Ipswich adversely.		The level of detail suggested by the response is beyond the scope of the SA which is providing a strategic level assessment of the effects of the plan.
5484	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Appendix C - Consultation Comments	OBJECT	Concerned that previous comments on Table 3-2 and Table 3-3 have been ignored.	The views and knowledge of Ipswich residents need to be better taken into account by the SA for it to be sound rather than being largely ignored.	Appendix C of the Proposed Submission Core Strategy SA report contains a response to each comment made on the Interim SA reports.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5726	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Appendix C - Consultation Comments	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. Concerned that previous comments on Table 3-2 and Table 3-3 have been ignored.	The views and knowledge of Ipswich residents need to be better taken into account by the SA for it to be sound rather than being largely ignored.	Appendix C of the Proposed Submission Core Strategy SA report contains a response to each comment made on the Interim SA reports.
5483	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	OBJECT	We want the best for Ipswich with the right policies put in place to deliver successful outcomes. This can only be achieved if the SA accurately identifies the many issues facing Ipswich, which are highly visible and recognised by its residents. As in our previous consultations responses, we maintain that the SA fails to accurately reflect the state of Ipswich and presents a very optimistic view of the impacts of the CS on the Borough.		The SA has highlighted negative impacts where there is the potential for these to occur and identified mitigation measures which were taken on board in the Proposed Submission Core Strategy review (see Annex to Proposed Submission Sustainability Reports (December 2014)).

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
24075	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	OBJECT	The manner of "last minute", poorly drafted "revisions" to the Executive paper on the 15th October [2013] on CS10 were unacceptable, and in breach of protocols and SCI. The subsequent failure by IBC to properly clarify the changes and place them in the public domain in a timely and transparent fashion added to the confusion and was not in the public interest. The revisions make a fundamental change in direction that has "seriously undesirable unintended consequences" which should be properly referenced, appraised and evaluated within the SA. The CS10 changes are not properly referenced nor track-changed within the SASR.		The Scoping Report is not the tool for identifying changes to policies. However, the SA report assessed the policies as contained within the Proposed Submission Core Strategy review based upon the assessments which were undertaken in the Interim SA report. It is unclear what revisions to the Executive paper are being referred to. This Executive paper set out the approach proposed in the Draft Core Strategy Focused Review (October 2013) which was subsequently published for consultation between January and March 2014. The changes to CS10 were shown in 'track changes' in the Draft Core Strategy Focused Review document.
5725	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	OBJECT	SOCS endorse the Northern Fringe Protection Group's points. We want the best for Ipswich with the right policies put in place to deliver successful outcomes. This can only be achieved if the SA accurately identifies the many issues facing Ipswich, which are highly visible and recognised by its residents. As in our previous consultations responses, we maintain that the SA fails to accurately reflect the state of Ipswich and presents a very optimistic view of the impacts of		The SA has highlighted negative impacts where there is the potential for these to occur and identified mitigation measures which were taken on board in the Proposed Submission Core Strategy review (see Annex to Proposed Submission Sustainability Reports, December 2014).

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5620	Natural England (Mr John Jackson) [1413]	Chapter 4: APPRAISAL OF THE CORE STRATEGY AND ITS ALTERNATIVES	OBJECT	<p>the CS on the Borough.</p> <p>Natural England is reasonably satisfied that the Sustainability Appraisal considers the impacts of the Core Strategy and Policies on relevant aspects of the environment within our remit, including biodiversity and geology, landscape, green infrastructure and soils. We particularly welcome SA objectives to protect and enhance designated sites, including SSSIs, SACs, SPAs and Ramsar sites, in addition to locally designated and non-designated areas of biodiversity. However, we would advise that the SA should cross-reference with the findings and recommendations of the Appropriate Assessment which identifies potential recreational disturbance effects on European sites and measures to mitigate these.</p>		The assessment of CS7 refers to the conclusions of the SA, however further references to the HRA have been included within this Addendum.

REP ID	RESPONDENT NAME	CHAPTER	SUPPORT/ OBJECT	REPRESENTATION SUMMARY	CHANGE TO PLAN REQUESTED	IBC response
5500	Northern Fringe Protection Group (Mr Brian Samuel) [976]	Chapter 5: CUMMULATIVE VE EFFECTS	OBJECT	The SA does not take account of the cumulative effects of Core Strategies in neighbouring authority areas regarding housing, employment, traffic/transport and air quality. There is no evidence of any strategic policy outcomes from the Ipswich Policy Area. The jobs targets of the four local authority areas within the Ipswich Policy Area are 26% higher than the total January 2015 EEFM forecast and there is a risk that the jobs targets are unrealistic.	The cumulative effects of neighbouring authority's plans need to be assessed. The SA should take account of any effects from the IPA Board.	Evidence base documents relating to the Ipswich Policy Area are included within the Core Document library, including the Strategic Housing Market Assessment (2012) and Ipswich Housing Market Area Population and Household Projections (2013). The Employment Land Needs Assessment is to be published alongside prior to Submission. The jobs figure relates to Ipswich Borough. Section 5 of the Proposed Submission Core Strategy SA refers to cumulative effects with neighbouring authorities.
5594	Save Our Country Spaces (Mrs Barbara Robinson) [978]	Chapter 5: CUMMULATIVE VE EFFECTS	OBJECT	Likely predicted Climatic Change and adverse climatic weather impacts are insufficiently addressed with insufficient work on Compound and Cumulative Impacts likely, especially from the Suffolk Coastal District growth and expansion plans. A Joint Environmental Impact Assessment of the Core Strategy is needed for the whole of the Ipswich Policy Area. An isolated EIA on the Northern Fringe would provide no necessary safeguards for public health. Hyder's SA does not address the issues we suggest. (see Appendix E [of full submission] - SOCS 2 Sept 2014 SA Scoping Update Consultation).		Section 5 considers cumulative effects, however this has been expanded in this addendum to refer to proposed developments close to Ipswich. The issues raised by SOCS in their letter of 2nd September 2014 have been responded to in Appendix C of the Proposed Submission Core Strategy SA report.