

Ipswich Borough Council Local Plan

Examination of Core Strategy and Policies Development Plan Document Review and Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document

Stage 2 Matters and Questions - Response to Matter 4b Residential Development Allocations

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Matter 4b – Residential Development Allocations (Policies SP2, SP3 and SP4)

4.2 Are the site allocations for residential development soundly-based? Are there other non-allocated sites which could appropriately contribute towards housing needs during the plan period?

Policies SP2 and SP3

Consistency with national policy

1. The Council's Soundness Self-Assessment Checklist (pages 5 and 15) identifies how the policies relating to housing allocations are consistent with the National Planning Policy Framework (NPPF).¹

Positively Prepared

2. The Council has actively sought to identify sufficient land to meet its housing requirement. The Council's response to Matter 2.3 as part of Stage 1 of the Local Plan Examination explains that there is insufficient land in the Borough to allocate sites to fully meet the housing requirement and explains the other options which have been considered and discounted.
3. The Council published a Strategic Housing Land Availability Assessment (SHLAA) in March 2010 and updated it in November 2013. This assessment objectively considered all sites which might be suitable for housing in terms of whether they are 'deliverable' or 'developable' (which includes whether a site is suitable, available and achievable). A range of criteria were considered in relation to whether a site was suitable for housing, including consideration of access, contamination, existing uses and flood risk. An explanation as to the suitability, availability and achievability of each site is provided in the SHLAA report. Consultation on the methodology for the SHLAA was undertaken in 2008, and the comments received and how they were addressed are shown in Annex C of the 2010 SHLAA. Consultation also took place on the draft SHLAA report and details of the comments received and how they were addressed is contained in Annex G of the 2010 SHLAA report. The results of the SHLAA have informed whether or not sites have been considered appropriate for allocation.
4. The NPPF states that the supply of new homes can sometimes be best achieved through planning for larger scale new development, such as settlements or extensions to existing villages and towns that follow the principles of Garden Cities. The Council has actively sought to follow this approach through its proposals for 3,500 dwellings at Ipswich Garden Suburb, however due to the tightly drawn boundary there are no further options for such large scale urban extensions.
5. The Council's response to Matter 1.4 as part of Stage 1 of the Local Plan Examination explains its approach to working with neighbouring authorities to plan for the residual requirement and has submitted amendments to policy CS7 following receipt of the Inspector's Interim Findings report in this respect. It is clear, therefore, that the Council is actively seeking to address the shortfall which it has not been able to identify sites for.

¹ DCLG, 2012, *National Planning Policy Framework*, CDL reference NCD18

Justified

6. At Preferred Options stage (2007)² the Council identified a number of sites for residential development which are no longer proposed for allocation. A number of comments received at Preferred Options stage raised issues relating to deliverability and planning constraints which would render some sites unsuitable for allocation³. The comments and the Council's response are contained in the Site Allocations Pre-Submission Consultation Statement⁴. Through the preparation of the Strategic Housing Land Availability Assessment⁵ the Council undertook a more thorough analysis of deliverability through direct contact with landowners. Further, the NPPF was published after the Preferred Options consultation and placed greater emphasis on deliverability as an important criterion when considering whether a site should be allocated. The table at Appendix 1 to this statement shows the sites which were removed following the Preferred Options consultation with a brief explanation for that removal and a reference to the relevant documentation.
7. Four sites proposed for residential use in the Draft Site Allocations plan (Oct 2013)⁶, and assessed in the Sustainability Appraisal, were subsequently removed prior to the publication of the Proposed Submission Site Allocations plan⁷. Site IP175, 47-51 Waveney Road, was originally included as it had had planning permission for residential use. However it was removed as it was not developed and has an operational garage on it. If it is to come forward it would count towards the windfall allowance. Site IP257, Land at Felixstowe Road east of Malvern Close, was removed once it became apparent that the site was still required for its use as a children's centre. Site IP121, Front of pumping station Belstead Road, was removed following consultation on the draft as it became apparent that the land is required for water supply purposes. Site IP259, Former Holywells High School, was also removed as it became apparent that the site was required for other uses which are currently operational on the site.
8. The allocations for residential use have all been assessed through the Sustainability Appraisal process and have been judged to be suitable for housing or a mix of housing and other uses. Sustainability Appraisal was initially undertaken on each site at Preferred Options stage⁸ and identified effects and possible mitigation measures where relevant. Sustainability Appraisal was later undertaken on each site as part of the Sustainability Appraisal of the Draft Site Allocations Plan⁹ and was updated where necessary as part of the Sustainability Appraisal of the Proposed Submission Site

² Ipswich Borough Council, 2007, *Site Allocations and Policies – Preferred Options*, CDL reference LPCD07 and Ipswich Borough Council, 2007, *IP-One Area Action Plan – Preferred Options*, CDL reference LPCD08

³ Please note that the comments on the Preferred Options consultation are listed in order of the former 'UC' prefix for sites. The Council has produced a map and index for ease of cross referring between the current 'IP' and former 'UC' prefixes – please see CDL reference PSCD20.

⁴ Ipswich Borough Council, 2014, *Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Pre-Submission Consultation Statement*, CDL reference SUCD18

⁵ Ipswich Borough Council, 2010, *Strategic Housing Land Availability Assessment Final Report*, CDL reference ICD09

⁶ Ipswich Borough Council, October 2013, *Draft Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document*, CDL reference LPCD21

⁷ Ipswich Borough Council, November 2014, *Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document*, CDL reference SUCD03

⁸ Suffolk County Council, 2007, *Sustainability Appraisal – Preferred Options*, CDL reference LPCD09 (see Appendix 6)

⁹ Hyder, 2013, *Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Interim Sustainability Appraisal Report*, CDL reference LPCD22

Allocations plan¹⁰ and the Sustainability Appraisal of the Pre-Submission Main Modifications to the Site Allocations plan.¹¹

9. Where potential effects were identified and mitigation was considered possible, the Sustainability Appraisal has recommended mitigation measures. These have been incorporated into the plan, as shown in the Annex to the Sustainability Appraisal¹². Appendix F of the submitted Site Allocations Sustainability Appraisal report¹³ contains the final assessments of the proposed allocations.
10. Alternative uses for each of the sites have been considered through the Sustainability Appraisal. This assessment was undertaken as part of the Sustainability Appraisal of the Draft Site Allocations plan¹⁴. Appendix D of the submitted Site Allocations Sustainability Appraisal report¹⁵ contains this assessment of alternatives. This includes consideration of whether sites proposed for allocation for non-residential use would be suitable for residential use and whether sites proposed for mixed use allocation could accommodate a greater proportion of residential use. The assessment contains the reasoning for not allocating further residential for each site as set out in Appendix 2 to this statement.
11. In addition to the conclusions of the SA, in terms of the potential for sites allocated for employment uses to be considered for residential uses, the quantum and distribution of employment sites proposed for allocation are considered to be 'sound' as explained in the Council's response to Matter 6.
12. In terms of sites not proposed for allocation for any use, sites IP179 'Land surrounding Thurleston Lane' and IP184 'Land adjacent to Humber Doucy Lane' could deliver 562 and 226 dwellings respectively, as identified in the SHLAA. However both sites were discounted due to infrastructure constraints which would need to be addressed through larger scale development in association with adjoining local authorities. Development of land to the north of IP179 (between IP179 and the Borough boundary) would present the same issues as identified with IP179 itself.
13. The Council considers that the sound planning of these areas would proceed through a comprehensive assessment of opportunities at the edge of Ipswich with neighbouring local authorities through joint work scheduled to start in 2016. This would enable any appropriate sites to be identified, which perform most favourably in terms of sustainability, existing use, deliverability and the market, rather than piecemeal sites being considered simply because they fall within the Borough boundary. Any areas of potential thus identified would also require comprehensive master planning as has taken place at the Ipswich Garden Suburb.

¹⁰ Hyder, 2014, *Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Sustainability Appraisal Report*, CDL reference LPCD49

¹¹ Arcadis, 2015, *Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Sustainability Appraisal Report Addendum – Pre-Submission Main Modifications*, CDL reference LPCD50

¹² Ipswich Borough Council, December 2014, *Annex to Proposed Submission Sustainability Appraisal Reports – Addressing Recommendations*, CDL reference LPCD36

¹³ Arcadis, 2015, *Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Sustainability Appraisal Report*, CDL reference SUCD10

¹⁴ Hyder, 2013, *Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Interim Sustainability Appraisal Report*, CDL reference LPCD22

¹⁵ Arcadis, 2015, *Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Sustainability Appraisal Report*, CDL reference SUCD10

14. There are also a number of smaller areas of countryside identified around the periphery of the Borough. This includes five parcels of land on the western edge of the Borough adjacent to the A14. These sites have not been considered through the SHLAA or through the Local Plan process as, between them, they are heavily constrained or have other significant problems including noise from the A14, lack of access from within the Borough and represent arbitrarily drawn parcels of land relating purely to the boundary of the Borough.
15. These were addressed by the Council through its Stage 1 submission statements (Matter 2.3, paragraphs 33 and 34) and the Inspector noted in his Interim Findings Report that 'The Council states that beyond the sites which have been the subject of representation in the Examination (to be considered at Stage 2) it is not aware of any others in the Borough which could feasibly contribute in any significant way to the supply of housing land' (paragraph 6.1).
16. Sites which have not been allocated, or have been proposed for allocation and subsequently removed, might come forward for development as windfall if considered suitable. Policy CS7 of the Core Strategy and Policies Development Plan Document Review¹⁶ provides for a windfall allowance of 1,800 dwellings over the plan period and the Housing Trajectory¹⁷ shows how this is expected to contribute to housing supply on an annual basis.
17. Policy SP3 seeks to ensure that sites with planning permission or a resolution to grant planning permission for residential use are safeguarded for that use should the permission lapse or fail to be issued or development stall. It is considered necessary because such sites account for a significant potential supply of over 1,800 dwellings. Given market conditions, there may be uncertainty about whether development on the sites will come forward in the permitted form. Proposed Pre-Submission Main Modifications propose to update policies SP2 and SP3 to 1st April 2015, by moving those sites listed in policy SP3 on which planning permission had lapsed into policy SP2, and moving sites previously allocated through policy SP2 which had gained planning permission by the same date into policy SP3.

Effective

18. The Council has engaged with landowners and developers in relation to each of the sites proposed for allocation. Policy SP2 contains a list of all sites proposed for development and an indication of the likely timescale for their delivery. The allocations and likely timescales for delivery are based upon information provided to the Council from this process. The housing trajectory contains further detail of the likely timescale for delivery. Where a mix of uses is proposed, the Council will take a pragmatic approach over the precise percentages to be provided.
19. It is concluded that there are no other sites which could appropriately contribute towards housing needs during the plan period. The Council has committed to work with neighbouring authorities on a joint or aligned local plan to meet housing needs which cannot be met within the Borough.
20. The Council therefore considers that Policies SP2 and SP3 are soundly based.

¹⁶ Ipswich Borough Council, 2014, *Proposed Submission Core Strategy and Policies Development Plan Document Review*, CDL reference SUCD01

¹⁷ Ipswich Borough Council, 2016, *Housing Supply Position Statement*, CDL reference PSCD01

Policy SP4

21. Much of Policy SP4 is considered to duplicate Policy CS11 'Gypsy and Traveller Accommodation' of the Core Strategy and Policies Development Plan Document Review¹⁸ and is considered surplus to requirements now that the allocation at River Hill has been deleted.
22. The Council has proposed modifications to Policy CS11 following the Stage 1 Hearings and receipt of the Inspectors' Interim Findings report (see response to Matter 4a). This involves moving the clause in SP4 'Sites currently used by Gypsies and Travellers are identified on the Policies Map and are protected for that use' to Policy CS11.
23. The commitment in the Policy to work with local authorities across Suffolk to identify sites is contained in Policy CS11.
24. The criteria for considering planning applications for permanent pitches is covered by the criteria contained in Policy CS11.
25. The Council therefore wishes to propose a modification which would see the deletion of Policy SP4 and its supporting text.

¹⁸ Ipswich Borough Council, 2014, *Proposed Submission Core Strategy and Policies Development Plan Document Review*, CDL reference SUCD01

Appendix 1: Residential allocations removed between Preferred Options (2007) and Draft Site Allocations plan (2013)

IP ref	UC ref	Address	Number of units (as per Preferred Options consultation)	Reason for non-allocation	Relevant documents
IP001	UC001	Land between 91-97 Fore Street	10	Site had planning permission for 58 student units at time of 2010 SHLAA but has not been developed. Would be counted towards windfall allowance if it comes forward.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP002	UC002	Handford Road East	25	Site now developed	N/A
IP003	UC003	Waste tip north of Sir Alf Ramsey Way / West End Road	259	Site not available or achievable at point of SHLAA – would be counted towards windfall allowance if it comes forward	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP007	UC007	Ranelagh School, Paul's Road	18	Site not available or achievable at point of SHLAA – would be counted towards windfall allowance if it comes forward. Through the update to the SHLAA it was revealed that there are no known plans for the school to relocate.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP008	UC008	All Weather Area, Halifax Road	43	Site not available – in recreational use	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP013	UC013	Hill House Road	17	Site not available or achievable at point of SHLAA – would be	Strategic Housing Land Availability Assessment 2010 (CDL reference

IP ref	UC ref	Address	Number of units (as per Preferred Options consultation)	Reason for non-allocation	Relevant documents
				counted towards windfall allowance if it comes forward. The site was removed from the SHLAA in the 2013 update as fewer than 10 dwellings were expected to come forward.	ICD09) Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11)
IP014	UC014	Orwell Church	35	Through the update to the SHLAA it was revealed that the church have no known plans to relocate.	Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18) Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11)
IP016	UC016	Funeral Directors, Suffolk Road	160	Site now developed	N/A
IP017	UC017	Land West of Handford Cut	27	Site identified as not deliverable in SHLAA	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP018	UC018	Deben Road	20	Site identified as not deliverable in SHLAA. Through the update to the SHLAA it was revealed that there were no known plans for the businesses on site to relocate.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11)
IP020a / IP020b	UC020	Water Tower, Park Road	56	IP020a part completed for 5 dwellings. Remainder of site not available or achievable at point of SHLAA.	Housing Trajectory in Housing Supply Position Statement – (CDL ref PSCD01)
IP021	UC021	Randwell Close	13	Site now developed	N/A
N/A	UC022	The Albany	40	Site now developed	N/A
IP023	UC024	Fire Station, Colchester Road	16	Site part completed – 59 dwellings	Housing Trajectory in Housing Supply Position Statement – (CDL ref PSCD01)

IP ref	UC ref	Address	Number of units (as per Preferred Options consultation)	Reason for non-allocation	Relevant documents
IP024	UC025	Mallard Way garages	8	Site identified as not deliverable in SHLAA	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP025	UC026	Former Garages, Recreation Way	10	Site now developed	N/A
IP026	UC027	163 & 165 Henniker Road	9	Existing Gypsy and Traveller site	N/A
IP028a / IP028b	UC029	Land West of Greyfriars (Jewsons)	33	IP028b not available or achievable at point of SHLAA. The SHLAA update states that it is unlikely that either site will be delivered.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP034	UC035	578 Wherstead Road	22	Not suitable due to flood risk	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP036a and b	UC037	No 7 Shed, Orwell Quay	158	Part of site now developed for student accommodation, remainder identified as a 'development site' in the Education Quarter opportunity area.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP041	UC042	Police Station, Elm Street	43	Site not available or achievable at point of SHLAA. Site forms part of mixed use Westgate allocation.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP044	UC045	Land south of Mather Way	26	Site not available or achievable at point of SHLAA and is in Employment Area.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)

IP ref	UC ref	Address	Number of units (as per Preferred Options consultation)	Reason for non-allocation	Relevant documents
				The SHLAA update identifies that the car park on the site is operating on a long lease.	Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP045	UC046	Holywells Road (west)	170	Site not available or achievable at point of SHLAA and is in an Employment Area.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP046	UC047	Wolsey Street	21	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP050	UC053	Land west of New Cut, south of Felaw Street	61	Site not available or achievable at point of SHLAA and is part in Employment Area. The SHLAA update identifies it is unlikely to be available in next 10 years.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP053	UC056	Orwell Retail Park	101	Site not deliverable – in retail use	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Site Allocations Pre-Submission

IP ref	UC ref	Address	Number of units (as per Preferred Options consultation)	Reason for non-allocation	Relevant documents
					Consultation Statement (CDL ref SUCD18)
IP055	UC058 and UC072	Crown House etc	57	Site not available or achievable at point of SHLAA. The SHLAA update identifies it is unlikely that the existing uses will relocate. Part of site allocated for a car park.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP058	UC061	Raeburn Road South / Sandy Hill Lane	102	The SHLAA update refers to the amenity issues related to proximity of the site to the sewage works. Proposed employment allocation	Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11)
IP062	UC065	London Road allotments	54	Site not available – in use as allotments	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP064	UC067	Holywells Road (east)	63	Site not available or achievable at point of SHLAA and is in Employment Area	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP065	UC068	Former 405 Club, Bader Close	89	Site part completed – 103 dwellings	Housing Trajectory in Housing Supply Position Statement – (CDL ref PSCD01)
IP067	UC070	Former British Energy Site	92	The SHLAA update refers to the amenity issues related to proximity of the site to the sewage works. Proposed employment allocation	Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11)

IP ref	UC ref	Address	Number of units (as per Preferred Options consultation)	Reason for non-allocation	Relevant documents
IP068	UC071	Truck and Car Company, Cliff Road	18	Site had planning permission for 14 dwellings at time of 2010 SHLAA but has not been developed. SHLAA update identifies that it is unlikely that a small housing scheme could suitably mitigate flood risk.	Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP069	UC073	Land between Cobbold St and Woodbridge Road	31	Site not available	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP072	UC076	Cocksedge Engineering, Sandy Hill Lane	22	Site not available or achievable at point of SHLAA. The SHLAA update refers to the amenity issues related to proximity of the site to the sewage works.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11)
IP073	UC077	Thomas Wolsey School	76	Site now completed	N/A
IP076	UC080	Land at Yarmouth Road	22	Site not available	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP081	UC086	Land north of Ranelagh Road	48	Site now developed for a hotel.	Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP085	UC092	345 Woodbridge Road	21	Site had planning permission for 14 dwellings but is in use as a car dealership so is not currently available. Would be counted towards windfall allowance if it	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)

IP ref	UC ref	Address	Number of units (as per Preferred Options consultation)	Reason for non-allocation	Relevant documents
				comes forward.	
IP095	UC106	Morpeth House, Lacey Street	11	Site not available	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP097	UC110	Telephone Exchange, Portman Road	29	Site not available or achievable at point of SHLAA. SHLAA update identified that it is unlikely to become available. Still in use by BT.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11)
IP100	UC114	6-24 Defoe Road	11	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP101	UC115	R/O Stratford Road and Cedarwood Road	11	Site not available or achievable at point of SHLAA. SHLAA update states it is unlikely that access constraints could be overcome.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11)
IP102	UC120	Henniker Road (rear of 668 – 730 Bramford Road)	27	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP103	UC125	32 Larchcroft Road	8	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP104	UC128	301-305 Norwich Road	23	Site not available or achievable at point of SHLAA. SHLAA update identifies that there are no known plans for the current	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Strategic Housing Land Availability

IP ref	UC ref	Address	Number of units (as per Preferred Options consultation)	Reason for non-allocation	Relevant documents
				business to relocate.	Assessment Update 2013 (CDL reference ICD11)
IP106	UC130	Rear of Riverside Road / Bramford Road	19	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP107	UC132	Rear of 601-655 Bramford Road	71	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP108	UC148	Builders Yard, Vermont Crescent	7	Site not available or achievable at point of SHLAA. SHLAA update identifies that there are no known plans for the business on site to relocate.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP109	UC156	Rear of Jupiter Road and Reading Road	23	Site had planning permission at time of SHLAA but has not been implemented. Would be counted towards windfall allowance if it comes forward.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP110	UC157	14 Crofton Road	14	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP111	UC167	Club, Newton Road	18	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP112	UC170	2 and 4 Derby Road	27	Site not available or achievable at point of SHLAA. Would be counted towards windfall allowance if it comes forward.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP113	UC171	The Railway PH and Foxhall Road	4	Site not available or achievable at point of SHLAA. Would be counted towards windfall	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)

IP ref	UC ref	Address	Number of units (as per Preferred Options consultation)	Reason for non-allocation	Relevant documents
				allowance if it comes forward.	
IP114	UC172	Rear of Cauldwell Hall Road and Kemball Street	25	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP115	UC180	547 Foxhall Road and land to rear	13	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP117	UC192	Land to the rear of Allenby Road and Hadleigh Road	25	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP119	UC199	Land east of West End Road	51	Identified as not suitable for housing in SHLAA.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP120	UC201	Land west of West End Road	57	Site not suitable The SHLAA update identifies that there are no known plans for the existing business to relocate.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Strategic Housing Land Availability Assessment Update 2013 (CDL reference ICD11) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP122	UC213	Rear of 17-27 Ramsey Close	20	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP124	UC229	100 Clapgate Lane	18	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference

IP ref	UC ref	Address	Number of units (as per Preferred Options consultation)	Reason for non-allocation	Relevant documents
					ICD09)
IP125	UC230	Corner Hawke Road and Holbrook Road	9	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP123	UC224	Car Park, Crown Street / Tower Ramparts	4	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)
IP126	UC231	251 Clapgate Lane	16	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP127a	UC234	15-39a Bucklesham Road	21	Part of site had planning permission for 3 dwellings at time of SHLAA which has now been developed. Remainder of site not suitable.	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP128	UC236	Former Driving Test Centre, Woodbridge Road	13	Site now completed	N/A
N/A	UC246	South of Bramford Road	25	Site now completed	N/A
IP134	UC249	St Matthews Street	53	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP138	UC254	253/255 London Road	6	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Site Allocations Pre-Submission Consultation Statement (CDL ref

IP ref	UC ref	Address	Number of units (as per Preferred Options consultation)	Reason for non-allocation	Relevant documents
					SUCD18)
IP137	UC252	Running Buck, St Margaret's Plain	25	Site not deliverable	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09)
IP154	UC271	2-6 Russell Road	83	Site not available or achievable at point of SHLAA	Strategic Housing Land Availability Assessment 2010 (CDL reference ICD09) Site Allocations Pre-Submission Consultation Statement (CDL ref SUCD18)

Appendix 2: Alternative uses considered for non-residential and mixed use sites (from Appendix D of Site Allocations Sustainability Report – SUCD10)

Note – assessment originally undertaken as part of SA on Draft Site Allocations plan (2013)

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council’s additional comments
IP004 – Bus depot, Sir Alf Ramsey Way	50% residential / 50% B1a	<ul style="list-style-type: none"> • 100% residential • 100% employment 	Small site - 1.07 ha. Alternative of 100% residential use will have more negative impacts on air quality and water resources but contribute to housing SA objective and health. The alternative of 100% employment use will have a more significant contribution to economic objectives. The current allocation would contribute to both social and economic objectives.	
IP005 – Former Tooks Bakery, Old Norwich Road	Residential and health centre	<ul style="list-style-type: none"> • Leave as existing (employment use) • 100% residential 	The proposed use will have negative impacts on air quality, and water use. The alternative to leave as existing use would have a neutral effect on air quality and traffic. The alternative of 100% residential will not provide a health centre and would not make as much positive contribution to the SA Objective on health but other impacts are expected to be the same.	
IP010a – Co-op Depot, Felixstowe Road	80% residential / 20% extension to Rosehill Primary School	<ul style="list-style-type: none"> • Leave as existing (west part mix of vacant and in use employment premises). 	The proposed allocation would contribute to housing and educational objectives. Retaining depot uses would contribute to employment objectives.	The school requires an extension and therefore an alternative of 100% housing would not be realistic.
IP010b – Felixstowe Road	60% residential (remainder retains existing employment uses)	<ul style="list-style-type: none"> • Leave as existing (mainly in-use employment premises) 	The proposed allocation would contribute to housing and employment objectives but would result in increased traffic from private car use. The alternative of retaining	The land in use for employment is not currently available for development and 100% residential would therefore not be a realistic option.

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
			employment uses would contribute to employment and economic objectives.	
IP011b – Smart Street / Foundation Street	Allocated for mixed use development consisting of 80% residential and 20% B1 business	<ul style="list-style-type: none"> • 100% housing • 100% B1 employment • 100% leisure • Mix of the above (30% each plus retail). 	<p>The proposed uses will make contributions to housing needs and employment generation.</p> <p>100% housing will increase traffic in the area, which is within an AQMA.</p> <p>100% B1 employment will contribute to economic SA Objectives but employment use may not address housing needs in Ipswich.</p> <p>100% leisure alternative would contribute to social and health objectives.</p> <p>Mixed use alternative (housing, employment and leisure) would contribute to social, health and economic objectives.</p>	
IP015 – West End Road Surface Car Park	20% residential plus long stay car parking and 10% B1 office use	<ul style="list-style-type: none"> • Housing • Employment, • Retain existing use (surface car park) <p>Mix of the above:</p> <ul style="list-style-type: none"> • 50% car parking and 50% housing • 50% car parking and 50% B1 employment • 100% car parking 	<p>IP015 has an area of 1.21ha and is near an AQMA. Since the site is currently a car park, and the proposed residential use, employment plus a car park would have neutral effect on air quality and traffic when compared to the existing baseline. The allocated use would contribute to housing and economic objectives. However, an alternative to have less parking should be considered to reduce impacts on air quality and traffic.</p> <p>The alternative of 100% parking, which is the existing use, would have a neutral effect on air quality and traffic.</p> <p>However, the opportunity to contribute to social (housing) and economic</p>	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
			<p>(offices) objectives as the proposed allocation would be lost. 50% parking and 50% housing would contribute to the housing SA objective and would have less impact on air quality than its existing use. 50% parking and 50% employment would contribute to economic objectives and would have less negative effects on traffic and air quality in relation to the baseline.</p>	
IP029 – Land opposite 674-734 Bramford Road	70% residential and 30% open space	<ul style="list-style-type: none"> • 100% housing • 100% employment • 100% open space 	<p>The proposed allocation will contribute to the social objectives on housing and health but may impact on air quality due to increased use of private cars. 100% housing will contribute to housing and health but will have a more significant negative impact on traffic and the quality of life for future residents since 100% housing would require developing right up to the railway line and A14. 100% employment may contribute to economic objectives but would have less contribution to social objectives. The site is located within a residential area, near the boundary of Ipswich, where there are open spaces nearby. Allocating the site for 100% open space would contribute to environmental objectives but not social or economic objectives.</p>	
IP032 – King George V Field, Old Norwich Road	80% residential and 20% open space	<ul style="list-style-type: none"> • 100% housing • 100% open space 	<p>This 3.54 ha site is currently a playing field. Development would result in negative impacts on air quality, water</p>	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
			<p>use, and soil quality. 100% housing will increase traffic in the area. Retaining the site as open space will contribute to health objectives but would have less contribution to social objectives as housing. However, there are 3 other playing fields in the vicinity of the site, replacement provision would have to be made and residential use is proposed for the adjacent site, IP005.</p>	
IP033 – Land at Bramford Road (Stocks site)	50% residential and 50% open space	<ul style="list-style-type: none"> • 100% housing • 100% open space. 	<p>This is a former landfill site with an area of 2.03 ha. The proposed use is predicted to have negative impacts on air quality and traffic since housing developments are expected to increase the use of private cars. 100% housing would have a more significant impact on traffic. 100% open space would not contribute to social objectives but would contribute to health and environmental objectives. The site is in the vicinity of residential areas and open spaces are located approximately 500m from the site and as such, there may be no requirement for open space in the areas.</p>	
IP035 – Key Street / Star Lane / Burtons	Employment / Hotel / Retail	<ul style="list-style-type: none"> • 80% housing and 20% employment; • 60% large scale retail, 20% leisure and 20% car parking. 	<p>The allocation for employment use will contribute to economic SA objectives. The alternative proposed, which is 80% housing will contribute to SA objectives but not as significantly to economic objectives. Also, it may have negative effects on air quality and traffic and the site is already with</p>	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
			<p>an AQMA. The alternative of large scale retail, leisure and car parking would have the greatest potential for traffic generation.</p>	
IP037 – Island Site	<p>50% Housing, 30% employment and leisure, 15% open space, 5% small scale retail/café/restaurant See also Opportunity Area development principles and guidelines in Part C</p>	<ul style="list-style-type: none"> • 70% housing, 20% employment and small scale food and drink (including retaining boat building), 10% open space; • 20% housing, 20% open space and 60% employment, cultural (e.g. museum or concert venue) and small scale food and drink (including retaining boat building). • 100% open space is considered undeliverable on viability grounds. 	<p>This 6.02ha site is close to an area designated as AQMA along Star Lane, College Street, and Bridge Street located to the north and northeast of the island. The site will contribute to an increase of new residents in the area as it is anticipated that 50% of the land will be allocated for residential use with indicative capacity of 271 new homes. As a result of the influx of a significant number of new residents the traffic is likely to increase on the road that connects the island to the mainland. In addition, IP037 has the potential to generate traffic in peak hours from users of the office or leisure facilities. The site is currently not served by public transport (due to its existing use) and the additional vehicular access may lead to increase in the use of private cars in the area. Potential negative effects may occur as a result of congestion at junctions with Grey Friars Road/A1022 and Bridge Street/A137. The alternative option of 70% housing, 20% employment and 10% open space would generate more traffic on surrounding roads but would have a greater contribution to housing and health SA Objectives.</p>	<p>Since the assessment of alternatives was undertaken, part of the Island Site has now also been awarded Enterprise Zone status, which would further reduce the suitability for increased residential development on the site.</p>

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
			<p>The alternative option of 20% housing, 20% open space and 60% employment would generate less traffic than the proposed allocation but would have a greater contribution to economic objectives and less contribution to housing and health.</p>	
<p>IP040 and IP041 – Civic Centre Area / Civic Drive – Land at Westgate</p>	<p>This site is primarily allocated for 80% retail development but will incorporate some residential e.g. over retail uses</p>	<ul style="list-style-type: none"> • 50% B1 employment and 50% housing • 60% retail and 40% leisure. 	<p>The 1.31 ha site is located next to a secondary shopping area and the allocated use will contribute to the achievement of plan economic objectives related to retail development, the vitality and viability of centres and extension of the Central Shopping Area.</p> <p>The alternative option of 50% employment and 50% housing may generate more traffic along Crown Street and St. Margaret Street and deteriorate the air quality in an existing AQMA. However, as a central location, there would be opportunities for residents and workers to choose more sustainable options. This alternative would contribute to social and economic objectives.</p> <p>The alternative option of 60% retail and 40% leisure may have some positive effects on the economic objectives by attracting more investment in a central area. However, it would not contribute to social objectives by limiting the amount of housing provision in the town centre.</p>	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
IP043 – Commercial buildings and Jewish Burial Ground, Star Lane	80% Residential 20% Employment B1	<ul style="list-style-type: none"> • 60% B1 employment and 40% leisure; • A mix of 60% residential, 20% employment and 20% small scale retail which broadly reflects a previous planning application ref 07/00643. 	<p>This site (0.70 ha) seeks to provide 61 dwellings. The site is within an AQMA and residential use will result in extra traffic, which will impact on air quality. The alternative 60% employment and 40% leisure would have less traffic impacts than the allocated use but would not contribute to the SA housing objective. The leisure use would contribute to health and other social objectives, such as reducing social exclusion and providing opportunities for public participation.</p> <p>The alternative 60% residential, 20% employment and 20% small scale retail would result in less traffic than the proposed allocation and still provide contribution to housing.</p>	The site is now proposed for allocation for 50 dwellings.
IP047 – Land at Commercial Road				An assessment of alternative uses was not undertaken for this site. However, because of its location in the Princes Street and River Corridor Opportunity Area its development should reflect the principles for development in this area (e.g. office and leisure). Nevertheless the Council considers some housing would be appropriate.
IP048 – Mint Quarter / Cox Lane	60% residential, 40% amenity greenspace and short stay multi-storey car parking	<ul style="list-style-type: none"> • 80% housing and 20% open space; • 80% retail and 20% residential; • 50% retail and 50% retain existing use as car park. 	The proposed allocation would contribute to housing and health objectives. The proposed new public space would contribute to social objectives. It would provide a space where people could meet and may contribute to reducing social exclusion. The public open space	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
			<p>would also potentially contribute to environmental objectives by improving air quality and biodiversity. This option would be more sustainable than the alternatives.</p> <p>The alternative of 80% housing and 20% open space would increase traffic and impact on air quality in this site which is near to three AQMAs.</p> <p>The alternative 80% retail and 20% residential will contribute to economic objectives but less so towards the social objective of housing and indirectly, health objective.</p> <p>The alternative 50% retail and 50% retain existing use as car park would increase traffic and impact on air quality in the area.</p>	
IP049 – No 8 Shed, Orwell Quay	Education / waterfront uses, public car parking, ancillary uses to university (e.g. GP surgery)	<ul style="list-style-type: none"> • 50% student housing and 50% teaching space; • Mix of 60% housing, 20% B1 employment, 10% hotel and 10% leisure & small scale retail which broadly reflects a previous planning application (now withdrawn) ref 09/00756. 	<p>This site has an area of 0.76ha. The proposed allocation will contribute to educational, employment, and economic objectives.</p> <p>The alternative of 50% student housing and 50% teaching space would contribute to housing, educational and employment objectives.</p> <p>The alternative mix of 60% housing, 20% employment, 10% hotel and 10% leisure would have more contribution to health than the proposed allocation and the other alternative due to its leisure component.</p>	
IP051 – Old Cattle Market Portman Road	80% employment B1 20% main town centre uses excluding retail	<ul style="list-style-type: none"> • 80% housing and 20% employment; the preferred option 	The proposed allocation of 80% employment and 20% main town centre uses would contribute to	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
		<ul style="list-style-type: none"> of 40% large scale leisure • 20% employment 20% residential 10% Hotel 10% small scale retail; • 50% retaining the existing use as car parking and 50% B1 office employment. • 100% housing is considered unrealistic as is it in the flood zone and would need less vulnerable uses on the ground floor. 	<p>employment and economic objectives. The alternative of 80% housing and 20% employment will increase traffic and impact air quality. The site is near the football club stadium and there may be increase in traffic in the area during major sport events. Although Portman Road gets closed during events at the football ground, there could be noise and disturbance issues for housing adjacent to the ground. The preferred option of 40% large scale leisure, 20% employment, 20% residential, 10% hotel and 10% small scale retail would contribute to economic and social objectives. The alternative of 50% retaining the existing use as car parking and 50% B1 office employment would contribute to employment objectives but the car parking would increase traffic in the area and adversely impact on air quality. This is the least sustainable option.</p>	
IP052 – Land between Lower Orwell Street and Star Lane	80% residential 20% Employment	<ul style="list-style-type: none"> • 100% employment • 100% leisure. 	<p>This is a small site (0.40). The proposed allocations would contribute to housing, health and economic objectives but residential use will increase traffic in this area which is within an AQMA. The alternative of 100% employment would contribute to employment and economic objectives. The alternative of 100% leisure would contribute to health and social objectives, such as reducing social</p>	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
			<p>exclusion. It would also contribute to the vitality of the town centre. The alternatives of 100% employment and 100% leisure would have less impact on traffic than the proposed allocation.</p>	
IP054 – Land between Old Cattle Market and Star Lane	<p>Employment Residential (30%) Small scale retail Possible public car parking Electricity sub station</p>	<ul style="list-style-type: none"> • 40% retain existing uses (W of Turret Lane) 60% mix of offices, leisure and car parking; • 25% housing 25% B1 employment 25% large scale retail 25% car parking. 	<p>This 1.72ha site is allocated for mixed use development which may generate traffic on Star Lane and key town centre roads. Although the site is well served by public transport and near two bus stations, the number of new residents suggests potential for congestion at key junctions in the town centre.</p> <p>The alternative of 40% retain existing uses (W of Turret Lane) and 60% mix of offices, leisure and car parking (this mix broadly reflects the Link proposal) would contribute to economic, social and health objectives, but the car parking would increase traffic to the area.</p> <p>The alternative of 25% housing 25% B1 employment 25% large scale retail and 25% car parking would contribute less to the SA objective on housing but would contribute to employment and economic objectives; car parking would increase traffic in the area.</p>	
IP055 – Crown Street	100% car parking	<ul style="list-style-type: none"> • 50% leisure (sport or culture) and 50% public car park; • 50% housing, 30% leisure and 20% public car park. 	<p>The alternatives would have less impact on traffic and air quality than the proposed allocation. It would not contribute to health, housing or employment. This is the least sustainable option because of its</p>	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
		Leisure/cultural uses could relate to Crown Pools or to the High Street museum hub.	potential environmental impacts. However, the allocation of 100% short term parking would support the vitality and viability of town centre shops. The alternative of 50% leisure (sport or culture) and 50% public car park would have less impact on traffic and will contribute more positively to social and health objectives. The alternative of 50% housing, 30% leisure and 20% public car park would contribute more positively to the housing, social and health objectives and there will be less increase in traffic than the proposed allocation.	
IP058 – Former Volvo Site, Raeburn Road South	100% employment	<ul style="list-style-type: none"> • Employment • Housing • Retail. • A mix of 50% open space and 50% employment. 	The site has an area of 5.82 ha. The site is in existing employment use (storage) and is also identified as a County Wildlife Site, but as the Wildlife Audit update 2012 recommends, its CWS status should be reviewed because the species for which it was designated is no longer evident. The proposed allocation would impact on biodiversity, amenity and health. Since the site is currently designated as a country wildlife site, more consideration is required prior to its allocation for employment. The alternative of a mix of 50% open space and 50% employment would also impact biodiversity, health and amenity.	Environmental Health advised that housing was inappropriate due to odour from nearby water recycling centre. See also email from Anglian Water dated 1.6.16 (PSCD26)
IP061 – Former School Site, Lavenham Road	70% residential 30% open space	<ul style="list-style-type: none"> • 100% retaining as open space • 50% housing 50% 	The proposed allocation would contribute to housing and health objectives.	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
		open space.	The alternative of 100% retaining as open space would indirectly contribute to health as people may use the open space, but would not contribute to SA objective on housing. The alternative of 50% housing 50% open space alternative would contribute to the SA housing objective and the health objective.	
IP067 – Former British Energy Site	100% employment	None		Environmental Health advised that housing was inappropriate due to odour from nearby water recycling centre. See also email from Anglian Water dated 1.6.16 (PSCD26). Employment use is the only realistic alternative as the landowner would be unlikely to deliver open space.
IP083 – Open space	80% public open space 20% extension of land uses associated with IP015	<ul style="list-style-type: none"> • 100% open space; • 60% open space, 20% housing and 20% small scale retail and food and drink. 	The site is near an AQMA. Only 20% of site IP083 will be allocated for residential uses; therefore it is not considered that new residents will contribute significantly to increase in the traffic on the key roads in the area. The alternative of 100% open space will have less contribution to SA objective on housing but this would not be significant but would contribute more significantly to biodiversity, amenity and health. The mix of 60% open space, 20% housing and 20% retail and food and drink would contribute to housing and economic objectives. Since the area is within a flood zone, housing may be a problem.	
IP090 – Europa Way	Residential and district	Retail use	This 1.43 ha site seeks to provide 142	There is a need for a new district

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
	centre mixed use		dwellings, which would result in an influx of private vehicles and an increase in emissions which may negatively affect local air quality. The significant number of homes provided by the allocation would support the District Centre. The site is located adjacent to an employment area and there are a number of housing sites proposed nearby (IP65, IP033 and IP029), all of which may result in cumulative effects on traffic and air quality. The alternative of retail use may contribute to economic and employment objectives. Its effect on traffic and air quality is not anticipated to have as significantly adverse an effect as the proposed housing allocation.	centre in this location so consideration of 100% residential would not be appropriate. Part of the site now has planning permission for A1 use. Note that at the time of the assessment the site had planning permission for 142 dwellings as part of a mixed use scheme. The revised figure of 18 dwellings reflects the masterplan for the site submitted with the planning application for the retail use on the eastern part of the site.
IP094 – Land to the rear of Grafton House	100% employment	<ul style="list-style-type: none"> • 100% hotel • 20% employment and 80% residential (the site is in the flood zone so the Council would look for non-residential use on the ground floor). 	The proposed allocation would contribute to employment and economic objectives. The alternative of 80% residential and 20% employment would contribute to the housing objective but being in the flood zone, would have a negative score against the health objective. The alternatives of 100% hotel and of 100% employment would have similar impacts although being in a flood zone, a hotel would have a negative impact on health.	
IP099 – Part of Former Volvo Site, Raeburn Road	100% employment	Only employment is appropriate because of proximity to water recycling centre.	Non-allocation would not contribute to employment or economic objectives.	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
		No realistic alternative except non-allocation.		
IP132 – Former St Peter's Warehouse Site	Residential, with employment leisure or small scale retail.			No alternatives were considered as the site had planning permission at the time the alternatives assessment was undertaken. However, the allocation is for residential-led mixed use.
IP136 – Silo, College Street	80% residential Offices / leisure / small scale retail	<ul style="list-style-type: none"> • 100% hotel 	<p>This 0.16ha site has a proposed allocation of 21 dwellings would contribute to housing and health objectives. It would also contribute to employment.</p> <p>The alternative use of 100% hotel would contribute to employment and economic objectives.</p>	The allocation is now 48 dwellings.
IP140 – Land north of Whitton Lane	100% employment	<ul style="list-style-type: none"> • 50% employment 30% housing 20% open space • An alternative of 100% housing is not realistic due to the Core Strategy commitment to deliver the 'green rim' in this vicinity. 	<p>IP140b has an area of 5.92ha, which is a greenfield site. The site is on grassland and would have the potential for transboundary effects attracting workers from Mid Suffolk and potentially having an effect on traffic moving in and out of Ipswich concentrated in the north west and particularly on the A14. However, the allocation would contribute to economic and employment objectives.</p> <p>The alternative of 50% employment and 30% housing and 20% open space could also result in increase in traffic but would contribute to housing, health, economic and biodiversity objectives.</p> <p>Any development on the site would have significant impacts on biodiversity and soil quality. There</p>	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
			could also be a significant impact due to loss of potential for food production from the loss of agricultural land.	
IP142 – Land at Duke Street	75% Residential 25% Open space	<ul style="list-style-type: none"> • 100% open space • 50% residential and 50% public car park. 	<p>The site has an area of 0.39 ha. The proposed allocation would contribute to housing and health objectives. The area is well served by public transport but there may be increased traffic due to private cars, impacting on the nearby AQMA.</p> <p>The alternative of 100% open space would contribute to SA Objectives on biodiversity and health. The nearest open space is approximately 400m from the site, so it would benefit nearby residents.</p>	There is a lack of open space in the area so increasing the housing proportion would not be appropriate.
IP146 – Ransomes Europark (East)	100% employment	This site lies in a designated employment area therefore there is no realistic alternative except non-allocation.		The sites are the final pieces of land available in Ransomes Europark which is an established employment area. To the east, Suffolk Coastal District Council have an allocation for an extension to the employment area in their Local Plan. Residential would not therefore be suitable.
IP147 – Land between railway junction and Hadleigh Road	100% employment	This site lies in a designated employment area therefore there is no realistic alternative except non-allocation.		Part of the site now has planning permission for employment uses.
IP149 – Pond Hall Farm	Country Park extension	<ul style="list-style-type: none"> • Retain as existing 	This 27.4ha site has access constraints, possible contamination and is adjacent to a Ramsar Site and Special Protection Area for Birds. The allocated use would result in loss of agricultural land, which would	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
			<p>impact on food production. However, a country park has potential to contribute to health, amenity, and soil resource objectives. There may also be potential for biodiversity enhancements. Providing a country park and visitor area would provide an opportunity to manage recreational impacts on the SPA, as recommended by the Appropriate Assessment of the adopted Core Strategy.</p> <p>The alternative of retaining the existing agricultural use would mean that there would be continued food production and no loss of agricultural land.</p>	
IP150b – Land at Ravenswood	100% Sports Park	<ul style="list-style-type: none"> • 100% residential • 100% open space • 50% residential 50% and open space. 	<p>Any development on this greenfield site has potential to impact on biodiversity. The proposed allocation will contribute to health, amenity and social objectives.</p> <p>The alternative of 100% residential would contribute to housing objective and indirectly to health objectives for the new residents. The sports park, however, would have potential direct health benefits for anyone in the Borough who would like to use the Sports Park.</p> <p>The alternative of 100% open space would have a similar contribution to health and amenity as the sports park but may have less contribution to community cohesion. However, this use would not impact on biodiversity.</p>	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
IP152 – Airport Farm Kennels	100% employment	<ul style="list-style-type: none"> • 50% Park & Ride and 50% agriculture • 80% residential and 20% open space • 50% P & R and 50% employment. 	<p>This has an area of 7.37 ha, which is currently in agricultural use and is a greenfield site. The site is adjacent to the proposed sports park (IP150b) and housing (IP150c) and countryside. The allocation is for 100% employment, which would contribute to economic objectives. However, a greenfield site, there are potential impacts on biodiversity, food production and the quality of soil resources.</p> <p>The alternative of 50% park and ride and 50% agriculture would result in increased traffic and impact on air quality in the area but would have a benefit within central Ipswich. 50% retained as agriculture would benefit soil and food production. The alternative of 80% residential and 20% open space would contribute to the housing, health, amenity and biodiversity objectives but not economic objectives.</p> <p>The alternative 50% park and ride and 50% employment would increase traffic in the area but the park and ride may benefit the town centre.</p>	
IP221 - Flying Horse PH, 4 Waterford Road	50% Residential 50% pub to be retained	100% residential	<p>This is a small site with an area of 0.35 ha. The allocation includes a pub will contribute to social objectives and provide a service to the local community.</p> <p>The alternative of 100% housing will contribute to housing objective but</p>	

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
			won't provide a service to the community.	
IP258 – Land at University Campus Suffolk	New primary school	<ul style="list-style-type: none"> • 100% student accommodation • 100% retaining existing teaching uses. 	<p>This site (2.58ha), allocated as a primary school, is near an AQMA. As a primary school, the allocation would contribute to educational objective and provide a key service to the community.</p> <p>The alternatives of 100% student accommodation or retaining existing teaching uses are not expected to have a significant impact on traffic since the site is well served by public transport. The 100% student accommodation would contribute to the housing objective but the primary school and retaining the site for teaching uses would contribute to the education objective.</p>	
IP260 – The former Odeon Cinema	100% leisure uses	100% residential	<p>Leisure use would complement the nearby theatre and provides access to a leisure service to the community. It would therefore contribute to the vitality of the centre and provide a place for people to meet, thereby reducing social exclusion.</p> <p>The alternative of 100% residential would contribute to housing objectives but would not contribute to the other social objectives.</p>	
IP261 – Land at River Hill	Former proposed allocation for a Gypsy and traveller site.	<ul style="list-style-type: none"> • Retaining existing use (grazing) • Housing • Allocating a larger area of the site for a greater number of G 	<p>This is 3 ha greenfield site which seeks to provide 5 pitches on part only for use by Gypsies and travellers on farmland.</p> <p>This allocation may cause disturbance to the land, lead to drainage problems</p>	Note the allocation for a gypsy and traveller sites has been deleted, but it is included in this table as the SA considered the possibility of a housing allocation.

Site ref / name	Proposed allocation	Alternative(s) considered	SA conclusions / Reason for discounting	Council's additional comments
		<p>& T pitches (approx. 20 pitches on up to 1ha).</p>	<p>and potentially contamination of the land from business activities if they are conducted on site.</p> <p>The alternative of retaining existing use (grazing) would retain soil quality and help support food production but would not meet a housing need.</p> <p>Housing would result in extra traffic and impact on air quality. As the site is next to the A14 there may be noise and access constraints.</p> <p>Allocating a larger area of the site for a greater number of pitches would increase negative impacts on soil and drainage. It would also increase traffic and air quality impacts but would provide more homes for Gypsies and travellers.</p>	
IP263 (now part of IP047)	Part of larger allocation for 40% residential, 20% open space and 40% office, leisure, hotel)	<ul style="list-style-type: none"> • 80% hotel 20% open space • 80% residential 20% open space. 	<p>The site may contribute partially to the achievement of the air quality SA objective through the provision of 0.17ha open space at the Waterfront part within the AQMA. The open space would also contribute to biodiversity, water, leisure, and indirectly, health objectives.</p> <p>The alternative of 80% hotel and 20% open space and 80% residential and 20% open space would contribute less to these objectives but the hotel would contribute to economic objectives and the residential, to the housing objective. Since this area is in the flood zone, there may be health risks from flooding.</p>	