

Ipswich Local Plan

Ipswich Borough Council Local Plan
Sustainability Appraisal and Strategic
Environmental Assessment – Statement of Particulars
in accordance with Regulation 16 (4) of
The Environmental Assessment of Plans and
Programmes Regulations 2004

February 2017



Planning and Development
Ipswich Borough Council
Grafton House, Russell Road Ipswich IP1 2DE
(01473) 432019

Email: planningpolicy@ipswich.gov.uk

Website: www.ipswich.gov.uk

Ipswich Borough Council Local Plan Sustainability Appraisal and Strategic Environmental Assessment – Statement of Particulars in accordance with Regulation 16 (4) of The Environmental Assessment of Plans and Programmes Regulations 2004

Introduction

This document is part of a suite of three documents required at Local Plan adoption stage and sits alongside:

- the Local Plan Adoption Statement, which also constitutes the Sustainability Appraisal and Strategic Environmental Assessment Adoption Statement for the purposes of the Environmental Assessment of Plans and Programmes Regulations 2004; and
- the Sustainability Appraisal Report.

Ipswich Borough Council adopted its Local Plan on 22nd February 2017. This new Local Plan consists of a Core Strategy and Policies Development Plan Document (DPD) Review and a Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD (hereafter referred to as the 'Core Strategy Review' and the 'Site Allocations Plan'). The Local Plan sets out a strategic approach to development across Ipswich, with detailed development management policies and site allocations, to guide the delivery of appropriate development in accordance with the National Planning Policy Framework (NPPF) until 2031.

The new Local Plan supersedes the adopted Core Strategy and Policies Development Plan Document (DPD), December 2011, as well as remaining saved policies from the adopted Ipswich Local Plan, November 1997. Development of this new Local Plan was prompted by the Government's publication of the NPPF in March 2012, the abolition of the East of England Plan in January 2013, new data becoming available such as 2011 Census, and the Inspector of the 2011 Core Strategy, who required an early review of said strategy in relation to housing delivery.

The Core Strategy Review and the Site Allocations Plan were considered by an independent Planning Inspector at an Examination in Public, which included Hearings held in March, June and July 2016. The Inspector's Report was published on 27th January 2017.

Sustainability Appraisal and Strategic Environmental Assessment of the Local Plan

Each stage of the Local Plan preparation has been accompanied and informed by sustainability appraisal (SA). SA, incorporating Strategic Environmental Assessment, considers the impacts of the Local Plan on the environment, society and the economy. The relevant SA reports are available to view in hard copy alongside this statement and if you are reading this online, please click on the hyperlinks which are included throughout the document.

The SA concluded that provided appropriate mitigation measures are put in place, the Local Plan will not cause significant adverse environmental/social/economic effects. The mitigation required has been incorporated into the plans e.g. policies requiring provision for walking, cycling and public transport.

This Sustainability Appraisal and Strategic Environmental Assessment Regulation 16 Statement of Particulars has been prepared in accordance with Section 16 (4) of the Environmental Assessment of Plans and Programmes Regulations 2004, which requires local planning authorities to demonstrate:

- how environmental considerations have been integrated into the plan or programme;
- how the environmental report has been taken into account;
- how opinions expressed and results of public consultation have been taken into account;
- the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

How have the environmental, social and economic considerations been integrated into the plan or programme?

A Sustainability Appraisal was completed for the Local Plan in accordance with the following legislation:

- European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment ('the SEA Directive') states that a Strategic Environmental Assessment is mandatory for plans prepared for town and country planning and land use purposes. The SEA Directive is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations (2004), which requires the Sustainability Appraisal of local development plan documents.
- The Town and Country Planning (Local Planning) Regulations (2012) state that a sustainability appraisal report must be completed for Local Plan documents in accordance with section 19(5) of the Planning and Compulsory Purchase Act (2004).

A Sustainability Appraisal is an assessment of the possible economic, environmental and social effects of a plan undertaken from the outset of the preparation process to allow decisions to be made that accord with sustainable development. Therefore, the SA was used to evaluate the various reasonable policy alternatives and consider the likely implications for sustainable development, in an iterative manner, of the 'Core Strategy Review' and the 'Site Allocations Plan' throughout their preparation.

The SEA Directive requires local planning authorities to carry out a formal Strategic Environmental Assessment of certain plans and programmes which are likely to have significant effects on the environment. The Strategic Environmental Assessment process ensures that opportunities for public involvement are provided and the significant environmental effects arising from policies, plans and programmes are predicted, evaluated, mitigated and monitored. Please see table 1, below, for further detail.

How have the SA reports been taken into account and how have opinions expressed and results of public consultation have been taken into account?

The SA Framework comprises a series of sustainability objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. SA is an iterative process carried out alongside the key stages of development of the Local Plan. Table 1 (below) illustrates the how the SA informed the development of the Ipswich Local Plan.

Table 1: How SA was used to inform the development of the Ipswich Local Plan.

Ipswich Local Plan	SA stage and how opinions have been taken into account through the consultation process.	How the environmental, social and economic considerations have been integrated into the Local Plan
<p>Focussed Review of Core Strategy and Policies Development Plan Document (DPD), December 2011; Site Allocations and Policies Development Plan Document.</p> <ul style="list-style-type: none"> • Call for ideas • Call for sites 	<p>The scoping stage of the SA (incorporating SEA) commenced during the pre-production and evidence gathering stage of the Local Plan.</p> <p>The sustainability framework for the Local Plan (comprising both the Core Strategy Review and the Site Allocations Plan) was developed for the sustainability appraisal by considering the social, economic and environmental objectives of other plans, programmes and objectives on a local, national and international scale; the characteristics of and key social, economic and environmental problems within Ipswich (baseline conditions) and the previous SA¹.</p> <p>The draft Scoping Report was issued in October 2013 to authorities with environmental responsibilities when deciding the scope and level of detail of the information which must be included in the environmental report. These authorities, known as 'required consultees' are the Environment Agency, Historic England (formerly English Heritage) and Natural England and their responses were taken into consideration in finalising the scoping report. Responses were also sought from a range of other consultees such as local interest groups, in order to ensure a wider picture of environmental, social and economic sustainability.</p>	<p>The Scoping Report was produced and was used subsequently used to guide the SA of the Core Strategy Focused Review and the Site Allocations Plan. A key aim of the scoping process was to ensure the sustainability appraisal process was proportionate and relevant to the Ipswich Local Plan.</p>
<p>Issues and Options</p> <ul style="list-style-type: none"> • Informal consultation on draft plan • This took place between 13th January and 10th March 2014 	<p>The Core Strategy Focused Review and Site Allocations DPD were assessed in 2013 and subject to informal consultation in early 2014. Public consultation was undertaken (under Regulation 18) on two draft development plan documents (Core Strategy Focused Review and Draft Site Allocations DPD) between January and March 2014. The Core Strategy at this stage was published as a focused review.</p>	<p>Interim SA Reports were prepared and consulted upon January - March 2014. They provided a summary of the SA process and the initial findings and recommendations of the assessment of both the Core Strategy Focused Review and the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document.</p>

¹ An SA was undertaken for the Draft Submission Core Strategy and Policies in 2009 by Suffolk County Council and the Core Strategy was subsequently adopted in 2011.

Ipswich Local Plan	SA stage and how opinions have been taken into account through the consultation process.	How the environmental, social and economic considerations have been integrated into the Local Plan
Review of extent of changes to the Core Strategy Review	Following this consultation the Council decided that the extent of changes to the Core Strategy amounted to a full plan review. This decision was taken in August 2014. Therefore, a Scoping Letter was issued in September 2014 to the required consultees and other consultees and this was published on Ipswich Borough Council's website to provide an update to the scope and approach to SA.	
Draft Plans (Preferred Options) <ul style="list-style-type: none"> • Consultation on the draft of the Local Plan for the future of Ipswich • This took place between 12th December 2014 – 5th March 2015 	<p>SAs were then undertaken on the Proposed Submission Core Strategy and Policies Development Plan Document Review (November 2014)² and Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document (November 2014)³. These SAs superseded the SA of the Core Strategy (which was adopted in December 2011) and the interim SAs of the Core Strategy Focused Review and the Draft Site Allocations Plan.</p> <p>Options were tested against the SA Framework to predict and evaluate the effects of the Core Strategy Review and the Site Allocations Plan in terms of mitigating adverse effects and maximising beneficial effects. This is SA "Stage B: Developing and Refining Options and Assessing Effects", where likely significant effects of the local Plan were identified, described and evaluated and where measures to avoid, reduce or offset any potentially significant adverse effects were recommended. This is an iterative process which influenced the ongoing development of the plan.</p>	<p>Each of the objectives in the Sustainability Framework is supported by a series of SA Sub-Objectives and indicators to add further clarity and to assist the assessment process.</p> <p>For the assessment of the Site Allocations Plan, the sites were grouped into 26 assessment groups, each of which was appraised against the sustainability objectives.</p> <p>For the assessment of the Core Strategy Review, those policies which had changed were appraised against the sustainability objectives. An evaluation was also completed of the potential cumulative effects that could result from implementation of the policies</p> <p>This SA process provided recommendations to improve the Core Strategy Review and the Site Allocations Plan e.g. "Opportunities should be sought to create and enhance habitats where new developments occur including through provision of green/open space and the use of SuDS."</p> <p>For further detail on how the SA reports influenced the ongoing development of the Local Plan, please see Appendix 1: Annex to Proposed Submission Sustainability Appraisal Reports – Addressing Recommendations December 2014</p>

² These are available in hard copy alongside this statement and also via this link: https://www.ipswich.gov.uk/sites/default/files/lpcd47_-_proposed_submission_core_strategy_sa_dec_2014.pdf

³ These are available in hard copy alongside this statement and also via this link: https://www.ipswich.gov.uk/sites/default/files/proposed_submission_site_allocations_sa_report_dec_2014.pdf

Ipswich Local Plan	SA stage and how opinions have been taken into account through the consultation process.	How the environmental, social and economic considerations have been integrated into the Local Plan
Pre-submission Main Modifications <ul style="list-style-type: none"> • Consultation took place 9th October - 23rd November 2015 	<p>Revisions to the SA report, and associated technical appendices, to reflect the changes made to the Local Plan after consultation and changes to Government policy, were issued for consultation in October 2015 and consulted upon alongside the modified draft plans⁴.</p> <p>Comments were taken into account alongside responses to the Local Plan as a whole in work to develop the next stage of the Local Plan.</p>	<p>SA Report Addenda were published for consultation alongside the Pre-submission Main Modifications following consultation on the submission draft. Each policy was assessed against the SA objectives and an evaluation was also completed of the potential cumulative effects that could result from implementation of the policies.</p> <p>This SA process provided recommendations to improve the Core Strategy Review and the Site Allocations Plan.</p>
Submission of the Local Plan, December 2015	<p>Revised SAs incorporating any changes necessary as a result of the consultation were submitted alongside the draft Local Plan.⁵</p>	
Post submission Main Modifications, October 2016	<p>Revisions to the SA report and associated technical appendices, to reflect the changes made to the Local Plan during the Examination in Public, were issued as SA Report Addenda for consultation at this stage to required consultees, as well as to other appropriate consultees with an interest in environmental, social and economic issues.⁶</p>	<p>The Post Submission Main Modifications to the Local Plan did not result in any significant changes to the SA or any changes to the significant effects identified in the Proposed Submission SA Reports and no further mitigation measures were considered necessary. The changes also have not resulted in any changes to the proposed monitoring framework which was set out in Section 6.4 of the Submission Core Strategy Review and Section 5 of the Site Allocations Plan SA reports (see footnote 5).</p> <p>For further detail on how the SA reports influenced the ongoing development of the Local Plan, please see Appendix 2 Annex to Post-Submission Main Modifications Sustainability Appraisal Report Addenda - Addressing Recommendations October 2016: https://www.ipswich.gov.uk/sites/default/files/annex_to_sa_addenda_october_2016.pdf</p>
Adoption of the 2017 Local Plan	<ul style="list-style-type: none"> • Local Plan Sustainability Appraisal and Strategic Environmental Assessment Adoption Statement • Regulation 16 Statement of Particulars • Sustainability Appraisal Report. 	

⁴ The two Pre-Submission Main Modification SA documents can be found here: https://www.ipswich.gov.uk/sites/default/files/lpcd48_-_core_strategy_sa_report_addendum_oct_2015.pdf and https://www.ipswich.gov.uk/sites/default/files/lpcd50_-_site_allocations_sa_report_addendum_oct_2015.pdf

⁵ The two Submission SA documents can be found here: https://www.ipswich.gov.uk/sites/default/files/sucd09_-_core_strategy_sa_report_10-12-15.pdf and here: https://www.ipswich.gov.uk/sites/default/files/sucd10_-_site_allocations_sa_report_10-12-2015.pdf

⁶ SA Report Addenda for the Post Submission Main Modifications https://www.ipswich.gov.uk/sites/default/files/core_strategy_sa_report_addendum_issued.pdf and https://www.ipswich.gov.uk/sites/default/files/site_allocs_sa_addendum_issued.pdf

Sustainability considerations are now strongly interwoven into the plan policies. As a result of every policy being tested for its sustainability integrity, amendments have been made to policies as they have been refined to maximise their effectiveness in achieving the environmental objectives set in the Sustainability Appraisal. This can be illustrated, most recently, in the Annex to Post-Submission Main Modifications Sustainability Appraisal Report Addenda - Addressing Recommendations, October 2016, in which the right hand column of the table indicates where an amendment has been incorporated into the Local Plan in response to the recommendation, or if this was not considered necessary, how the recommendation would be addressed through other policies (see Appendix 2 to this document).

Reasons for choosing the plan as adopted in the light of other reasonable alternatives

The Environmental Assessment of Plans and Programmes Regulations 2004 (12) (2) (b) requires that the SA/SEA evaluates reasonable alternatives, taking into account the scope and objectives of the plan.

Reasonable alternatives⁷ have been considered by the Council in the preparation of the Local Plan, and SA was taken against both the Local Plan and 'Alternative Strategy 1', which was presented in the Housing Topic Paper⁸.

The Council also compared the emerging policies in both plans to the non-implementation or 'do nothing' alternative.

Measures to be taken to monitor the significant environmental, social and economic effects of implementation of the plan

The Sustainability Appraisal is an iterative process. The success and effectiveness of the Local Plan will need to be monitored to ensure any unforeseen adverse effects are identified and acted upon. The suggested SA monitoring framework includes the following elements:

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

Monitoring should be ongoing during the whole life of the Local Plan and the monitoring framework reviewed regularly to ensure that monitoring is fit for purpose. The suggested targets and indicators are designed to be used as guidance only, as depending on how they are implemented they may require some future refinement. Information on monitoring and implementation of the Local Plan will be contained within the annual Authority Monitoring Report.

⁷ See Section 3.3. of https://www.ipswich.gov.uk/sites/default/files/sucd09_-_core_strategy_sa_report_10-12-15.pdf

⁸ The SA states that: "Alternative strategy 1 in the Housing Topic Paper considers the potential for securing higher density development on housing sites to deliver a higher number of homes. Whilst it was concluded that this is unlikely to be deliverable at present due to economic conditions, this option could represent a realistic alternative in the longer term should economic conditions change. It would be an alternative to the proposed wording of policies CS2 and CS7 which states that the council will work with neighbouring local authorities to address housing need later in the plan period."

Appendix 1:

[Annex to Proposed Submission Sustainability Appraisal Reports – Addressing Recommendations December 2014](#)

Ipswich Local Plan

Annex to Proposed Submission Sustainability Appraisal Reports – Addressing Recommendations

December 2014



IPSWICH
BOROUGH COUNCIL

Development and Public Protection
Ipswich Borough Council
Grafton House, Russell Road
Ipswich IP1 2DE
(01473) 432019

Email: planningandregeneration@ipswich.gov.uk

website: www.ipswich.gov.uk

Introduction

Sustainability Appraisal, incorporating the requirements for Strategic Environmental Assessment, involves the assessment of each policy against defined sustainability objectives and has been carried out on the Proposed Submission Core Strategy and Policies Development Plan Document (November 2014) and Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document (November 2014).

The tables overleaf set out the mitigation measures identified through the Sustainability Appraisal. Text in **bold** in the right hand column of the table indicates amendments which have been made to the Development Plan Documents a result of the Sustainability Appraisal. All amendments have been incorporated within the Proposed Submission Development Plan Documents. In a number of cases it has not been necessary to make amendments where the recommendation would be addressed through another policy.

The full Sustainability Appraisal reports, along with a Non-Technical Summary for each report, can be viewed on the Council's website at www.ipswich.gov.uk.

Proposed Submission Core Strategy and Policies Development Plan Document

Policy	SA recommendation / conclusion	Amendment / Justification
CS1, 2, 3, 5, 7, 10, 13, 14	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. Neighbouring authorities should also give significant consideration to this issue when allocating land to meet Ipswich's housing need.	DM17 has been amended to include criterion b 'not result in a significant impact on air quality or an Air Quality Management Area' based on the former DM15. In relation to recognising potential effects on neighbouring authorities text should be added to the supporting text to CS7 to highlight these potential effects which would need to be considered further through any future joint working.
CS4	A cross reference to these policies is recommended together with further strengthening of the policy to ensure against significant effects on these features. 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.	Text has been added to CS4 and the supporting text in relation to providing an appropriate level of protection to international and nationally designated nature conservation sites.
CS4	The beneficial score recorded against Policy CS4 could be strengthened though a direct reference in the policy wording to protecting and enhancing the Borough's soil resource and function.	This is highlighted in 8.44 but is more relevant to CS9 which specifically deals with promoting the use of brownfield land.
CS2	The policy may benefit from a specific reference to ensuring the public realm is of a high quality design along with new structures.	Text added to criterion (g) to state '...and which enhances the public realm.'
CS2	A cross reference to these policies (CS4 and DM31) is recommended together with further strengthening of the policy to ensure against significant effects on these features.	A sentence has been added into paragraph 1.8 to state 'Proposed development will be assessed against all relevant policies contained within this plan, the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document and any other

Policy	SA recommendation / conclusion	Amendment / Justification
		relevant plan.'
CS3	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.	Text has been added to criterion (e) to state ‘...and integrate new development with the existing townscape’
CS7 and CS10	Opportunities should be sought (particularly within Policy CS10) to encourage recycling within the new housing developments. Facilities should be provided to encourage reuse/recycling.	Text has been added to 9.56 ‘Provision for waste storage should support the aim to increase recycling.’
CS7 and CS10	It will be essential for planning applications to thoroughly assess the impacts of traffic and increases in carbon emissions from transport and to propose effective measures to mitigate any impacts following the guidance in the Garden Suburb SPD, Policy CS5 and the Travel Ipswich Scheme.	Policy DM17 requires transport assessments to be undertaken. In relation to climate change specifically (rather than air quality) the DPD already contains policies which seek to mitigate impacts on climate change including DM1, DM2, DM17 and CS1. Climate change is the result of cumulative emissions and not a localised effect which could be mitigated through specific measures such as in the case of air quality.
CS11	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’.	The references to conservation areas and historic sites have been deleted and new clause added ‘historic assets including their setting’.
CS15	New development should be required to minimise the amount of waste generated during construction and through the lifetime of the building.	This is addressed by CS4. Operational waste may be difficult to control. Policy DM5 requires development to be ‘highly sustainable’ and in relation to this the following has been added to the supporting text of DM5: ‘In order to promote sustainable use of materials encouragement will be given to the reuse of previously used materials in construction.’
CS15	It is recommended that the policy should be linked to Travel Ipswich.	Reference to Travel Ipswich has been added into 8.163: ‘Measures identified through Travel Ipswich could assist in ensuring sustainable travel to educational establishments and new education development will be expected to encourage sustainable means of transport.’

Policy	SA recommendation / conclusion	Amendment / Justification
CS15	It is recommended that new educational development should meet BREEAM standards.	Policy DM1 requires educational uses to meet BREEAM 'very good' standards.
CS15	It is recommended that land identified for educational use that is close to heritage assets such as listed buildings or Conservation Areas should be developed sensitively and in keeping with local townscape character in order to reduce effects to the setting of these assets.	This is covered by DM8. However, a sentence has been added into 1.8 to state 'Proposed development will be assessed against all relevant policies contained within this plan, the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document and any other relevant plan.'
CS15	It is recommended that the design of facilities should be of a high quality which complements the character of the local townscape and landscape.	This is covered by DM5. However, a sentence has been added into 1.8 to state 'Proposed development will be assessed against all relevant policies contained within this plan, the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document and any other relevant plan.'
CS15	It is recommended that the policy should refer to safeguarded land being accessible by sustainable transport.	CS5 and DM17 set out requirements in relation to sustainable transport provision. Sustainable transport provision for the Garden Suburb is covered under CS10. In relation to Suffolk New College and University Campus Suffolk, text has been added to paragraph 5.25 of the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document to state 'Proposals for development within the education quarter should demonstrate how sustainable modes of transport will be achieved.'
CS13 and CS14	With regards to flooding, it should be ensured that the allocated 30ha (minimum) of new employment development is outside flood zones 2 and 3.	Employment and retail development is classed as 'less vulnerable' in the National Planning Policy Guidance and is therefore not inappropriate in principle in zones 1, 2 and 3a. The Flood Risk Supplementary Planning Document provides further guidance on developing in flood risk zones 2 and 3.
CS13 and CS14	It should be ensured that the 30ha (minimum) of new employment allocations are located away from statutory designated sites along with areas with high	Employment allocations are located away from SSSIs and the SPA. In terms of wildlife value identified on the ecological networks map, any potential effects would be

Policy	SA recommendation / conclusion	Amendment / Justification
	biodiversity.	mitigated by DM31 which states 'development proposals will be required to have regard to existing habitat features and the wildlife corridor function, through their design and layout, and achieve net biodiversity gains commensurate with the scale of the proposal'. The wildlife audit does not suggest that future development should not take place but provides recommendations in terms of protecting key features. Text has been added to the end of paragraph 9.191 to state 'Reference should be made to the information and recommendations of the Wildlife Audit in relation to any proposals on, or that may affect, sites identified within it'.
CS13 and CS14	It should be ensured that the 30ha (minimum) of new employment allocations are well integrated into the existing environment.	This is mitigated through DM5.
CS17, 18 , 19 and 20	Opportunities should be sought to consider sustainable solutions to drainage system and sewage collection as well as sustainable water supply network.	This is mitigated by CS1 and DM4.
CS17	It will be beneficial to create a borough wide heritage assets register and identify the ones 'at risk' (as identified on English Heritages 'at risk' register) or with high priority.	There is a Suffolk Register of Buildings at Risk which is available at http://www.suffolk.gov.uk/environment-and-transport/planning-and-buildings/Buildings/suffolk-register-of-buildings-at-risk/ . It is not appropriate for CS17 to be specific about which heritage assets may be supported through the policy as this would depend on the location, nature and circumstances of individual developments.
DM2	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.	It is considered that this is provided for within DM5, DM8 and CS4 and therefore no further mitigation is necessary.
DM10	The policy may benefit further through including a reference to the Hedgerow Regulations 1997 which protect 'important hedgerows' from being removed	The following text has been added to the end of paragraph 9.83: The 1997 Hedgerow Regulations protect 'important hedgerows', as defined through Schedule 1

Policy	SA recommendation / conclusion	Amendment / Justification
	(uprooted or destroyed).	of the Regulations, from being removed.'
DM13	For Policy DM13, the loss of green space should be resisted where it would result in a significant loss of vegetation, trees etc that support valuable habitats.	This is addressed through DM31.
DM25	Any effects on water quality/pollution could be mitigated using standard, accepted mechanisms such as the Environment Agency's Pollution Prevention Guidelines.	Policy DM26 and Paragraph 9.162 address the potential effects of pollution from development. Reference to water pollution has been added to 9.162.
DM31	The policy could be strengthened through making reference to 'alone or in-combination with other proposals'.	The second paragraph of the policy will be amended to read 'Proposals which would lead to an adverse effect on the integrity of a European protected site, either alone or in combination with other proposals, will not be permitted unless imperative reasons of over-riding public interest exist in line with the provisions of the European Habitats Directive.'

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

A number of mitigation measures related to this DPD are addressed through policies in the Core Strategy and Policies DPD. For clarification the following text has been added to paragraph 2.3: **‘Proposed development will be assessed against all relevant policies contained within this plan, the Core Strategy and Policies Development Plan Document and any other relevant adopted plan. In particular, in bringing forward the allocated sites consideration must be given to the relevant requirements of policies contained in the Core Strategy and Policies Development Plan Document.’**

Site allocations policies (SP1- SP9) (for mitigation related to individual sites see end of table)		
SP4	It should be ensured that new gypsy and traveller accommodation is capable of being serviced with waste disposal and re-cycling facilities (as per CS11).	This is addressed through CS11
SP4	It is essential that if a new site becomes available, the criteria related to access are met (as per CS11).	This is addressed through CS11
SP4	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’.	The references in CS11 to conservation areas and historic sites have been deleted and new clause added ‘historic assets including their setting’.
IP-One Policies (SP10 – SP17) (for mitigation related to individual sites see end of table)		
SP17	Although the policy lists the benefits of promoting sustainable transport choices, it is recommended that Policy SP17 includes information on how it supports sustainable modes of transport within IP-One.	SP15 sets out proposals for improving sustainable transport modes in the IP-One area.
SP10	It is recommended that Policy SP10 should include reference to the provision of adequate waste facilities and where possible recycling facilities within the Central Shopping Area, Westgate and district centres.	This is addressed by DM5 which requires adequate provision to be made for storage of waste.
SP11, SP12, SP13 and SP14	It is recommended that Policies SP11, SP12, SP13 and SP14 should include reference to the provision of adequate waste facilities and where possible recycling facilities within the Waterfront, Education Quarter and town centre.	This is addressed by DM5 which requires adequate provision to be made for storage of waste.
SP11, SP12, SP13 and SP14	The application of Code for Sustainable Homes and BREEAM standards as part of new development should lead to a progressive reduction in waste	This is addressed by DM1 which sets out requirements in relation to the Code for Sustainable Homes and BREEAM.

	generation and encourage greater levels of re-use and recycling as part of new development.	
SP11, SP12, SP13 and SP14	It is recommended that Policy SP17 includes information on sustainable modes of transport within IP-One.	SP17 contains reference to sustainable modes of transport, sustainable transport is addressed in SP15.
SP11, SP12, SP14 and SP15	It is recommended that these policies include reference to ensuring that new development does not exacerbate current flood risk issues in the area.	Flood risk is identified within the Site Sheets where relevant and also in the Development Principles of the relevant opportunity areas.
SP11, SP12, SP13, SP14 and SP17	It is recommended that Policies SP11, SP12, SP13, SP14 and SP17 should make some reference to the use of SuDS features against flood risk.	This is addressed by DM4 which requires the appropriate application of SuDS.
SP10, SP11, SP12, SP13, and SP14	It is recommended that Policies SP10, SP11, SP12, SP13, and SP14 should make some reference to protecting biodiversity resources.	This is addressed by DM31.
SP10, SP11, SP12 and SP14	It is recommended that Policies SP10, SP11, SP12 and SP14 should include a reference to the protection of heritage assets (including listed buildings, scheduled monuments and non-designated sites).	This is addressed by DM8 and heritage assets are referred to on the Site Sheets where relevant for allocations related to these policies.
SP10	It is recommended that SP10 should include a reference to the design of new developments to enhance the townscape.	Addition made to Development Principles for the Mint Quarter Opportunity Area to refer to the Conservation Area.
SP11, SP12, SP13, SP14 and SP17	It is recommended that Policies SP11, SP12, SP13, SP14 and SP17 include a reference to the design of new developments taking account of the character of the Conservation Areas. (Note this may also be relevant to SP15 and SP16)	This is addressed by DM8 and reference to Conservation Areas is included within the Site Sheets where relevant.
SP17	Policy SP17 includes a reference to Travel Ipswich and states the use of sustainable modes of transport. Additional text in this policy should be provided on measures to encourage people to use sustainable measures rather than a private car.	This is addressed by SP15.
SP10, SP11, SP12, SP13 and SP14	It is recommended that Policies SP10, SP11, SP12, SP13 and SP14 make reference to incorporating Secured by Design in new developments, which would contribute towards reducing the potential for crime and	It is considered that DM5 would adequately address safety and security issues related to SP10 – 16. However, the following text has been added in to the reasoned justification supporting SP17 (paragraph

	anti-social activities. SP15 and SP16 should also make reference to making cycling and pedestrian routes safe in relation to the potential for crime and anti-social activities. SP17 should include a reference to incorporating safety design measures in car parks, which would contribute towards reducing crime and anti-social activities.	5.55): ‘When designing proposals, consideration should be given to Secured by Design guidance relating to car parks.’
Opportunity Areas		
All Opportunity Areas	It is recommended that all Opportunity Areas should make reference to improving walking and cycling routes in these areas.	They do where appropriate, for example A refers to cycle/pedestrian bridges; B refers to enhancing pedestrian linkage to the town centre; C refers to enhanced pedestrian permeability; E refers to enhanced pedestrian linkage north and eastwards; F refers to enhanced pedestrian and cycle routes to Waterfront. Reference to ‘Enhanced pedestrian and cycle permeability through the area and linking into wider networks.’ has been added into the Development Principles for Opportunity Area D.
All Opportunity Areas	It is recommended that Opportunity Areas should include a reference to providing landscaped areas and green spaces where practicable.	This is covered where such spaces are part of allocations, for example Opportunity Area F refers to the riverside green corridor. Policy DM29 relates to the provision of open spaces.
All Opportunity Areas	It is recommended that Opportunity Areas should include reference to the provision of adequate waste facilities and where possible recycling facilities within the areas.	This is addressed through policy DM5.
A - Island Site (including part of the former Opportunity Area E Over Stoke	It is recommended that Opportunity Areas A and D should include reference to the provision of cycling and walking routes to promote more sustainable transport choices, which may reduce car use within	Opportunity Area A already includes reference to provision of improvements for cycling and walking. Text has been added into the Development Principles section of Opportunity Area A: ‘Ensure suitable public

Waterside) D - Education Quarter	these areas.	transport provision’. Reference to ‘Enhanced pedestrian and cycle permeability through the area and linking into wider networks’ has been added into the Development Principles for Opportunity Area D.
All Opportunity Areas	It is recommended that Opportunity Areas include reference to community facilities such as community halls and health facilities.	In recognition that a more strategic approach may be needed in relation to the provision of community facilities in and around the Opportunity Areas, the following text has been added to the explanation to Core Strategy policy DM32: ‘In some instances a Community Management Plan may be required where there is a need for enhanced provision of community facilities or to promote opportunities for community engagement.’ In relation to health facilities, we are not aware of any specific needs relating to health facilities in the Opportunity Areas but policies CS17 and DM32 address the provision of these where needed.
All Opportunity Areas	It is recommended that these Opportunity Areas include reference to ensuring that new development does not exacerbate current flood risk issues in the area.	Flood risk is referred to where relevant for example within Opportunity Areas A, B D and F through reference to ‘Layout and design to address flood risk’
A - Island Site (including part of the former Opportunity Area E Over Stoke Waterside) D - Education Quarter	It is recommended that Opportunity Areas A and D should make some reference to the use of SuDS features against flood risk.	The combination of existing reference to flood risk (see above) and application of policy DM4 covers this.
All Opportunity Areas	It is recommended that ecological assessments should be undertaken during the design phase of development proposals.	This would be covered by DM31.
A - Island Site (including part of the former Opportunity Area E Over Stoke	It is recommended that Opportunity Areas A, B, C and D include a reference to the design of new developments being sensitive to the character of the Conservation Areas. Opportunity Area D should	Conservation areas would be covered by the references to the historic environment. River frontages are addressed through DM33: Development proposals which relate closely to river banks will be required to provide for the

Waterside) B - Merchant Quarter C - Mint Quarter and surrounding area D - Education Quarter	include a reference to the design of new developments being sensitive to the river corridor landscape.	improvement of public pedestrian and cycle paths along the site boundary relating to the river where appropriate and should enhance its appearance.
All Opportunity Areas	It is recommended that Opportunity Areas make reference to incorporating Secured by Design which would contribute towards reducing the potential for crime and anti-social activities.	Specific reference to secured by design has been added to the explanation to policy DM5 (9.46) which already refers to safe and secure communities.
Site Allocations		
Numerous sites	Public transport enhancements needed	DM17 and the transport assessment made at the time of the application would cover this
Numerous sites	A transport assessment needed looking at wider impacts (of the park and ride) in reducing congestion within central Ipswich and around the A14 junction	DM17 and the transport assessment made at the time of the application would cover this
Numerous sites	Remediation of land would help to improve soil quality	This is addressed through DM26.
Numerous sites	Appropriate remediation techniques and survey for contaminated land should be conducted during design of any scheme.	This is addressed through DM26.
Numerous sites	Provision of wildlife and recreational green corridor functions associated with the 'green rim' should be encouraged as this could provide partial benefits to the SA Objective.	This is covered by DM31 and DM33.
Numerous sites	Adequate waste facilities should be provided and where possible provision of recycling facilities. Where possible, waste reduction initiatives should also be encouraged.	Covered by CS4 and DM5. Beyond the sites themselves the provision of waste management facilities is addressed through Suffolk County Council's Waste Core Strategy.
Numerous sites	It is recommended that housing development should meet Code for Sustainable Homes standards.	This is addressed through DM1.
IP140 - Land north of Whitton Lane	It is recommended that the business park should meet BREEAM standards and where possible SuDS features should be incorporated into design.	This is addressed through DM1 and DM4.
Numerous sites	It is recommended that where possible SuDS features should be incorporated into design of sites	This is addressed through DM4.

Numerous sites	Where possible the site allocations should include provision of soft landscaping thus providing some benefits to biodiversity.	This is addressed through DM5 and DM31.
Numerous sites	Certain features at specific sites have the greatest wildlife value – e.g. hedgerows and mature trees – in such cases further surveys will be needed prior to any vegetation clearance to establish the full wildlife interest, including for birds and reptiles. Compensation measures should be implemented where appropriate.	This is addressed through DM31 and the site sheets at Appendix 3 which cross refer to the Ipswich Wildlife Audit Update 2012-13 where appropriate.
Numerous sites	It is recommended that development should complement the existing character of the area and opportunities should be sought to enhance townscape.	This is addressed through DM5 and the Urban Character SPD. The latter only covers inner Ipswich at present although outer areas to be started during 2015.
Numerous sites	Secured by Design should be considered during the design phase and increasing natural surveillance in order to deter crime	Covered by DM5 but reference to Secured by Design has been added into the supporting text of DM5 in 9.46 to state 'It is expected that consideration should be given to the principles set out by Secured by Design wherever appropriate.'
IP029 – Land opposite 674-734 Bramford Road	It is recommended that green buffers are used around IP029 to account for the close proximity of the A14 and the main railway line to the south of the site	This is addressed through DM26 and the Site Sheet which identifies the constraints
Numerous sites	It is recommended that adequate access is provided where possible to avoid exacerbating peak time congestion issues.	This is addressed by DM17 and would be assessed as part of planning application.
Numerous sites	It is recommended that where possible design should incorporate sustainability measures (e.g. reduce water use, use of grey water) and SuDS features.	This is addressed through DM1, DM2 and DM5
Numerous sites	It is recommended that vegetation is not removed during bird nesting season.	This is addressed through DM31 and DM10 and would be secured through planning conditions.
Numerous sites	The use of sustainable modes of transport should be encouraged through the implementation of a Travel plan	Covered by DM17 and DM19, however a Travel Plan isn't necessary in all cases, for example smaller developments.

IP116 – St. Clements Hospital	It is recommended that TPOs at the northern boundary of the site should be retained and TPOs within the site should be retained as far as possible	This is addressed through DM10 and the TPOs are identified on the Site Sheet.
IP116 – St. Clements Hospital	The St Clement's Hospital Building should be retained and enhanced as appropriate	This is covered by the Site Sheet.
Numerous sites	These sites should ensure that homes are designed to maximise energy efficiency which may also contribute to reducing fuel poverty.	This is addressed through DM1, DM2 and DM5.
Numerous sites	Provision of frequent public transport would help to reduce private car reliance.	This is addressed through DM17 and the transport assessment made at the time of the application would explore the potential for additional or more frequent public transport services if needed.
Numerous sites	It is recommended that where possible public transport links should be provided within 400m of development.	DM17 sets out a threshold of 400m which is unchanged from the adopted plan. It is a maximum distance and is considered to be an acceptable walking distance.
Numerous sites	Development should be undertaken sensitively to avoid negative effects to the Listed Buildings.	This is addressed through DM8 and listed building legislation.
Numerous sites	Use of sustainable modes of transport should be encouraged.	This is addressed through CS5 and DM17. The Council is also preparing a Cycling Strategy SPD.
Numerous sites	Any development should include provision to maintain and improve accessibility and connectivity to the green spaces within the district.	This is addressed through DM33, DM28 and DM29.
Numerous sites	Improved transport, connectivity and access routes should be encouraged to link the new developments to the employment area	This is addressed through CS5, DM17 and the location of site allocations for all uses.
IP058, IP067, IP099 – Sandy Hill Lane	Improvements should be sought to reduce impacts on air quality if the proposals are completed.	It is not clear how employment development on the allocated sites could help address odour issues from the adjacent sewage works but the employment allocation responds to the odour issue by now excluding any housing.
Numerous sites	Any contaminated excavated ground should be disposed of appropriately.	This would be covered by detailed planning conditions relating to DM26.
IP058, IP067, IP099 – Sandy Hill Lane	Any developments at these sites may require appropriate assessment under the Habitats	This is addressed through DM31.

	Regulations. Consultation with Natural England should be conducted upon receipt of any proposals.	
Numerous sites	Design of development should be sensitive and encourage a continuation of the features contained within the protected sites.	This is addressed through DM31 and DM10.
IP058, IP067, IP099 – Sandy Hill Lane	The improvement of the local nature reserves and green space should be encouraged to allow access and recreational use of sites.	The Site Sheet highlights the wildlife corridor role. There is no public access at present and it may not be appropriate on industrial sites.
Numerous sites	Cycling and walking should be encouraged through appropriate infrastructure and public realm improvements.	This is addressed through CS5, DM5, DM17 and the Council is producing a Cycling Strategy SPD
IP150a (Ravenswood S & T (adjacent Fen Bight Circle) Ravenswood U, V, W) IP150c (Land south of Ravenswood)	Consideration to the bird population of the adjacent River Orwell/Stour Estuaries SAC/Ramsar should be given. Where necessary appropriate assessment should be completed under the Habitats Regulations.	This is addressed through DM31 however it should be noted that the Stour and Orwell Estuaries SPA is some way from these sites. The Appropriate Assessment has not identified any issues relating specifically to these allocations.
IP150b (Land south of Ravenswood)	Development of any proposals in this area will be required to be sensitive to any protected species. Appropriate surveys should be conducted prior to any development.	This is addressed through DM31. The Site Sheet identifies that there may be protected species on site.
IP152 (Airport Farm Kennels)	Mitigation measures to offset the effects on species and habitats should be included within the proposals.	The Site Sheet identifies the wildlife value of the site and this would be addressed through DM31.
IP152 (Airport Farm Kennels)	Existing countryside features, such as hedgerows, should be maintained at IP152 wherever possible.	The Site Sheet refers to the retention of mature hedges.
IP149 (Pond Hall Carr and Farm; extension to Orwell country park)	Where possible linkages between the green spaces should be encouraged to improve the landscape characteristics.	The following text has been added to the Site Sheet: 'The site would need to be master planned and measures put in place to manage public usage and link routes with neighbouring sites. The impacts of proposals on the SPA will be tested.'
Numerous sites	Any proposals should include provision for open	This is addressed through DM29.

	spaces for community use.	
IP150b (Land south of Ravenswood) IP149 (Pond Hall Carr and Farm; extension to Orwell country park)	Community facilities, such as the sport facilities at IP150b and the country park extension at IP149 will encourage community participation. The proposals should include plans to maintain in good condition these community assets in the long term and provide linkages and connectivity where possible.	<p>The following text has been added to the Site Sheet for IP149 ‘The site would need to be master planned and measures put in place to manage public usage and link routes with neighbouring sites. The impacts of proposals on the SPA will be tested.’</p> <p>In relation to 150b the following text has been added: ‘Should link into cycling and pedestrian route networks.’</p> <p>DM28 provides protection for sports facilities once they are built.</p>
IP152 (Airport Farm Kennels)	Improved linkages to major road infrastructure should be encouraged.	Site sheet to IP152 says ‘Access constraints – should be master planned comprehensively with the Ravenswood site to the north (IP150c) and improvements to this part of the Nacton Road corridor between junction 57 and the Ransomes Way/Nacton Road junction to create an attractive gateway to Ipswich’
IP149 (Pond Hall Carr and Farm; extension to Orwell country park) IP150a (Ravenswood S & T (adjacent Fen Bight Circle) Ravenswood U, V, W) IP150b (Land south of Ravenswood) IP150c (Land south of Ravenswood) IP152 (Airport Farm Kennels)	To encourage inward investment it would be beneficial to improve access and connectivity between the existing and planned developments.	<p>Site sheet to IP152 says ‘Access constraints – should be master planned comprehensively with the Ravenswood site to the north (IP150c) and improvements to this part of the Nacton Road corridor between junction 57 and the Ransomes Way/Nacton Road junction to create an attractive gateway to Ipswich’</p> <p>The following has been added into the site sheets for IP150b and IP150c and into Appendix 3b in relation to IP150a which has planning permission: ‘It should link into cycling and pedestrian route networks.’</p> <p>Access to IP149 will be considered through the process of developing detailed proposals for the site, alongside giving consideration to impacts upon the SPA.</p> <p>Accessibility and connectivity are addressed in CS5 and DM17.</p>

IP146 (Ransomes Europark East)	The closest existing bus routes are along Central Avenue and Bluestem Road. The public transport network should be developed to include access to these sites.	This is addressed through DM17 and the transport assessment made at the time of the application would explore the potential for additional or more frequent public transport services if needed.
IP146 (Ransomes Europark East)	Surveys for protected species should be conducted prior to any proposals being approved.	This is addressed through DM31.
IP146 (Ransomes Europark East)	Design of this development should be sensitive and encourage a continuation of the features contained within the surrounding countryside.	This is addressed through DM5. However, consideration would need to be given to how the development would relate to any potential development to the east within Suffolk Coastal district.
IP146 (Ransomes Europark East)	The development should include some improvements for public transport and local amenity to benefit local residents.	The allocation is for employment land, due to its location in relation to residential uses, it is not clear how it could provide improvements to public transport and amenity that would benefit local residents.
IP146 (Ransomes Europark East)	Linkages between businesses should be sought with the existing employment area and those to the west of Nacton Road. This would extend the scope of investment in the area. The cumulative effect of these sites is likely to be positive in combination with the existing employment areas.	Accessibility is addressed through CS5 and DM17.
Numerous sites	Improvement of public transport links and green space connectivity should be encouraged to provide efficient movement of a workforce.	Improvements to public transport would be addressed through DM17. The connectivity of green space is promoted through DM33.
IP061 (School Site, Lavenham Road)	Improvements to the amenity of this space should be considered to offset impacts of the development.	30% of the site is to be retained as open space. The site sheet says 'The proposal is that 70% of the site is used for housing to improve the remaining open space. The type of open space provision would need to be agreed with the Council's Parks and Open Spaces Service.'
IP061 (School Site, Lavenham Road)	Measures should be taken to increase defences within this area in cooperation with the Environment Agency. Any development within this area should be sensitive to the flood risk issues and not increase downstream residual issues.	Site IP061 is not within flood risk zones 2 or 3 and is not shown to be at risk of surface water flooding.
IP061 (School Site,	Drainage issues should be taken into account through	This is addressed through DM4.

Lavenham Road)	the detailed planning of the development at planning application stage.	
IP147 (Land between railway junction and Hadleigh Road)	Measures should be put in place to ensure any potential impacts upon the site and local nature reserves are avoided or minimised. Development should be sensitive to the natural environment of the river and protect biodiversity resources.	The County Wildlife Site running along the river is identified in the Site Sheet, protection of which is addressed through DM31.
IP147 (Land between railway junction and Hadleigh Road)	Linkages should be improved to ensure that the residents have easy access to the employment opportunities.	Linkages are limited by the geography of the site as it is bounded on 3 sides by railways and the river, and in terms of residents' access to jobs the uses to the east and west are employment not housing. However the nearby site allocation IP059a includes provision for a pedestrian/cycle bridge over the river. Residents to the south have access to IP147 across Hadleigh Road.
IP059a (Elton Park Industrial Estate) IP059b (Arclion House, Hadleigh Road) IP061 (School Site, Lavenham Road) IP168 (Stoke Park Drive)	It would be beneficial to encourage existing businesses and employers within the nearby employment area and district centre 8 (at the junction of Kelly Road and Dickens Road) to invest in the newly created sites, by improving access and connectivity.	IP168 is adjacent to the Stoke Park Drive District Centre. Local Centre 8 at Dickens Road is easily accessible from IP061 via Kelly Road. It is slightly less convenient from IP059a and b as residents would need to cross Hadleigh Road. There is a pedestrian island to aid crossing Hadleigh Road at the bottom of Dickens Road but the need for additional road crossings would be considered as part of the planning application to IP059a Elton Park.
IP245 (12-12a Arcade Street) IP040 (Civic Centre Area / Civic Drive)	Where appropriate the completion of a licensed excavation and recording of remains before development commences	Details surrounding archaeology in the Site Sheets reflect the advice of Suffolk County Council's Archaeologist and therefore it is considered that no further mitigation is necessary.
IP055 IP253	TPOs are identified at IP055 and IP253 has TPO nearby and an application for Tree Works may be required (dependent on the design of the new car parking at IP055).	Reference to TPOs has been added into the Site Sheet and Table 3B respectively.
IP048 (Mint Quarter / Cox Lane) IP074 (Church and land at Upper Orwell	TPOs are identified at IP048 and IP074 and application for Tree Works may be required.	IP074 already has planning permission. The TPO is identified as a potential constraint in Appendix 3B (for sites with existing planning permission). The site is adjacent to the TPO tree rather than the tree being on the site and

Street)		therefore tree works may not be necessary. In relation to IP048 reference to the application for Tree Works has been added to the site sheet.
IP048 (Mint Quarter / Cox Lane) Ip264 (28-32 Tacket Street)	Where appropriate the mitigation measures can include completion of a licensed excavation and recording of remains before development commences.	Details surrounding archaeology in the Site Sheets reflect the advice of Suffolk County Council's Archaeologist and therefore it is considered that no further mitigation is necessary.
Numerous sites	With reference to potential impacts on Conservation Areas and/or Listed Buildings use of traditional or sympathetic building materials and techniques which respect those found on the surrounding buildings to maintain the local distinctiveness of the area. (In relation to sites within or close to Conservation Areas).	Where Conservation Areas and/or Listed Buildings are present this is identified in the Site Sheets. Policies CS4 and DM8 would ensure that new development is appropriate in the context of conserving and enhancing heritage assets. In relation to IP245, reference to the listed building next door at 14 Arcade Street has been added to the constraints on the Site Sheet.
IP052 (Land between Lower Orwell Street) IP011a (Smart Street / Foundation Street) IP0011b (Smart Street / Foundation Street) IP054 (Land between Old Cattle Market and Star Lane)	Flood risk assessment may be required at project assessment level to identify appropriate mitigation measures for the parts of the development that fall within Flood Zone 2 and 3 (e.g. through design). New developments should be encouraged to use SuDS to manage runoff, reduce further flood risk and protect water quality.	IP052: Only the Southern part is in the flood zone and the site sheet as already identified on the Site Sheet. IP011a already has planning permission and flood risk is identified in Appendix 3B as a constraint. IP011b: Flood risk is already identified as a constraint on the site sheet. SuDS and site specific flood risk assessments are addressed through policy DM4.
IP011a (Smart Street / Foundation Street) IP0011b (Smart Street / Foundation Street) IP054 (Land between Old Cattle Market and Star Lane)	TPO nearby is identified in IP011a, IP011b and IP054 and application for Tree Works may be required.	IP011a already has planning permission and the TPO is identified in Appendix 3B as a constraint. IP011b: The site sheet mentions the TPO however reference to an application for Tree Works has been added. IP054: The site sheet mentions the TPO however reference to an application for Tree Works has been added.
IP052 (Land between Lower Orwell Street) IP011a (Smart Street /	where appropriate the completion of a licensed excavation and recording of remains before development commences	IP052 and IP054: The site sheets provide detailed information on archaeology (provided by the County Archaeologist).

<p>Foundation Street) IP0011b (Smart Street / Foundation Street) IP054 (Land between Old Cattle Market and Star Lane)</p>		<p>IP011a already has planning permission but archaeology is identified as a significant constraint in Appendix 3B. IP011b: The site sheet provides detailed information on archaeology (provided by the County Archaeologist). It is considered that the existing information provided adequately protects archaeological interest in connection with Policy DM8.</p>
<p>IP089 (Waterworks Street) IP012 (Peter's Ice Cream) IP258 (Land at University Campus Suffolk as part of the Education Quarter) IP043 (Commercial Buildings and Jewish Burial Ground)</p>	<p>Sustainable modes of transport should be encouraged through improved pedestrian infrastructure and/or where appropriate the creation of cycle routes/lanes particularly around the vicinity of the university buildings.</p>	<p>IP089, IP012 and IP043 are actually outside the Education Quarter but text will be added to Opportunity Area D to emphasise the importance of connectivity by sustainable modes between the campus and other student facilities such as accommodation. Sustainable transport measures are addressed by DM17.</p>
<p>IP043 (Commercial Buildings and Jewish Burial Ground)</p>	<p>Flood risk assessment may be required at project assessment level to identify appropriate mitigation measures for the parts of the development that fall within Flood Zone 2 and 3 (e.g. through design). New development should be encouraged to use SuDS to manage runoff, reduce further flood risk and protect water quality.</p>	<p>Flood risk is identified on the site sheet. Policy DM4 addresses this including the requirement for site specific flood risk assessment.</p>
<p>IP089 (Waterworks Street) IP258 (Land at University Campus Suffolk as part of the Education Quarter)</p>	<p>TPO nearby is identified in IP089 and IP258 and application for Tree Works may be required.</p>	<p>Reference has been added to the site sheets to the possible need for an application for tree works.</p>
<p>IP035 (Key Street / Star Lane / Burtons - St. Peter Port)</p>	<p>Mitigation measures at project level can be included in Section 106 Agreement with regards to pedestrian infrastructure improvements or new bus stops (if any</p>	<p>This is addressed through DM17 and the transport assessment made at the time of the application would explore the potential for additional public transport services</p>

<p>IP132 (Former St Peter's Warehouse Site 4 Bridge Street) IP136 (Silo, College Street) IP205 (Burton's, College Street) IP206 (Cranfields, College Street) IP21 (Regatta Quay, Key Street) IP263 (West of Bridge Street)</p>	<p>bus route is diverted to meet the local needs).</p>	<p>or infrastructure if needed.</p>
<p>IP089 (Waterworks Street) IP012 (Peter's Ice Cream) IP258 (Land at University Campus Suffolk as part of the Education Quarter) IP043 (Commercial Buildings and Jewish Burial Ground)</p>	<p>where appropriate the completion of a licensed excavation and recording of remains before development commences</p>	<p>This would be addressed by DM8. Detailed archaeological comments provided by the County Archaeologist have been added to the site sheets and where appropriate these refer to archaeological investigation.</p>
<p>IP035 (Key Street / Star Lane / Burtons - St. Peter Port) IP132 (Former St Peter's Warehouse Site 4 Bridge Street) IP136 (Silo, College Street) IP205 (Burton's, College Street) IP206 (Cranfields,</p>	<p>Flood risk assessment may be required at project assessment level to identify appropriate mitigation measures. New developments should be encouraged to use SuDS to manage runoff, reduce further flood risk and protect water quality.</p>	<p>In relation to IP035, IP136 and IP263 flood risk is identified on the site sheets (or in Appendix 3B for sites which already have planning permission - IP132, IP205, IP206 and IP211). Policy DM4 deals addresses this including the requirement for site specific flood risk assessment.</p>

College Street) IP211 (Regatta Quay, Key Street) IP263 (West of Bridge Street)		
IP263 (West of Bridge Street)	Opportunities should be sought to enhance the area allocated for an open space (in relation to biodiversity).	Reference to the site being close to a County Wildlife Site has been added to the Site Sheet.
IP035 (Key Street / Star Lane / Burtons - St. Peter Port) IP132 (Former St Peter's Warehouse Site 4 Bridge Street) IP136 (Silo, College Street) IP205 (Burton's, College Street) IP206 (Cranfields, College Street) IP211 (Regatta Quay, Key Street) IP263 (West of Bridge Street)	where appropriate the completion of a licensed excavation and recording of remains before development commences.	This would be addressed by DM8. Detailed archaeological comments provided by the County Archaeologist have already been added to the site sheets and where appropriate these refer to archaeological investigation.
Numerous sites	The townscape distinctiveness should be conserved through the use of traditional or sympathetic building materials and techniques which respect those found on the surrounding buildings to maintain the local distinctiveness of the area.	This is addressed through DM5.
IP037 (Island site)	Mitigation measures at project level can be included in Section 106 Agreement with regards to pedestrian/cycle infrastructure improvements (new bridge) with extensions where appropriate along the existing river walks or along roads leading to key facilities. Due to the size of the site a separate	This would be addressed through DM17.

	Transport Assessment may be required to identify the need to provide a new bus service in the area.	
IP037 (Island site)	Habitats Regulation Assessment will be required to ensure that no adverse effects are likely to occur as a result of a new development.	The following text has been added to the Site Sheet: 'Its proximity to the Special Protection Area may necessitate an Appropriate Assessment of development proposals under the Habitat Regulations.'
IP037 (Island site)	Appropriate design of building should be considered in order to avoid any negative effects on the local character particularly with regards to the Neptune marina and the Neptune quay.	There is a conservation area character appraisal for the Wet Dock which would be used to guide design matters, as set out in DM8. The site sheet mentions that it is within the Wet Dock Conservation Area.
IP037 (Island site)	It would be beneficial if more land is allocated for open space along the banks of the island to enhance the landscape/townscape of the site.	The Site Sheet identifies that a minimum of 15% amenity green space would need to be provided. Maps for Opportunity Area A, although illustrative, show perimeter routes around the island and through a central green space. The 'development opportunities' section refers to a Waterfront promenade and the Development Principles include 'Protection of key vistas across the island' and 'Protection of predominantly open character of water area'.
IP037 (Island site)	Mitigation measures will be required to improve the access of residents to parks and playing grounds and to encourage more healthy life styles. Opportunities should be sought to use the river Orwell for leisure activities where appropriate.	The allocation includes amenity greenspace. Policy SP15 and the Opportunity Area A development principles include the requirement for pedestrian and cycle links e.g. across the lock gates, which would facilitate access to Holywells Park. The central location of the Island site encourages cycling and walking and the new links required would facilitate such choices. The Orwell is tidal at this point and therefore the leisure potential is limited. There are also navigation rights on it which would need to be considered. There is already leisure use of the Wet Dock e.g. for leisure craft marinas.
IP037 (Island site)	Careful consideration should be given on the ancillary facilities that may be required within a new mixed use development in order to ensure the quality of life of new residents is improved (e.g. post office).	Where specific needs can be identified this is identified on the Site Sheet, for example early years provision. The health sector has not to date indicated a need for additional health provision in the area. The proposed pedestrian and cycle links for example across the New Cut and lock gates

		would facilitate access to existing and proposed shops and services, for example at Duke Street District Centre and at Wherstead Road District Centre.
IP037 (Island site)	Improvements with regards to access to the site will be crucial to ensure residents are not affected by the existing movement barrier of the River Orwell.	These are specified throughout the plan as necessary, for example within SP15, SP16.
IP037 (Island site)	Public transport services are provided in the area of Bridge Street and pedestrian routes are enhanced.	This would be addressed by DM17 which would include a requirement for a transport assessment. Due to the potentially unique issues relating to public transport provision for this site, the following text has been added into the Development Principles section of Opportunity Area A: 'Ensure suitable public transport provision'.
IP226 (Helena Road)	A separate Transport assessment may be required to identify any significant negative effects from the development of IP226 due to its size and proposed use.	Paragraph 9.101 states that the Council would require a transport assessment for housing developments of 10 or more dwellings.
IP178 (Island House) IP142 (Land at Duke Street) IP098 (Transco, south of Patteson Road) IP226 (Helena Road) IP042 (Land between Cliff Quay and Landseer Road)	<p>Although the implementation of the tidal barrier and raised defences would raise the level of protection, the area will still be within Flood Zone 3 as the Flood Zones are developed without flood defences. In addition there is still a residual risk of flooding by either failure of the new defences, or overtopping in extreme events.</p> <p>Therefore development should be directed to areas of lower flood risk through the Sequential Test process and highly vulnerable development should not be permitted unless there are no alternative sites available.</p> <p>Flood risk assessment may be required at project level to identify appropriate mitigation measures for the parts of the development (IP042 and IP142) that fall within Flood Zone 2 and 3 (e.g. through design). Cumulatively, the effects from climate change can be reduced through encouraging people to use more sustainable modes of transport.</p>	Flood risk is identified on the Site Sheets (or in Appendix 3B for sites which already have planning permission e.g. 042, 226, 178). Policy DM4 addresses this including the requirement for site specific flood risk assessment. The sequential test was produced for the adopted Core Strategy and will be updated. An Exception Test was also undertaken for those sites falling within zones 2 and 3 as part of the Level 2 SFRA, including IP098 where flood risk is identified as an issue on the Site Sheet. Site IP142 lies just outside the flood risk area identified by the Environment Agency.

	New developments should be encouraged to use SuDS to manage runoff, reduce further flood risk and protect water quality. Flood risk assessment may be required at project assessment level to identify appropriate mitigation measures for the parts of the development that falls within Flood Zone 2 and 3 (e.g. through design). Water quality could be enhanced if opportunities are sought to remediate the contaminated land where appropriate.	
IP142 (Land at Duke Street) IP042 (Land between Cliff Quay and Landseer Road)	TPO nearby is identified within the northern parts of IP142 and IP042 and application for Tree Works may be required.	IP042 already has planning permission. Reference to the TPO has been added to Appendix 3B. For IP142 reference to the application for Tree Works has been added to the site sheet.
IP200 (Griffin Wharf, Bath Street)	A separate Transport Impact assessment may be required to identify any significant negative effects from the development of IP200 due to its size and proposed use.	Paragraph 9.101 states that the Council would require a transport assessment for housing developments of 10 or more dwellings.
IP188 (Websters Saleyard site, Dock Street) IP039a (Land between Gower Street & Gt Whip Street) IP133 (South of Felaw Street) IP200 (Griffin Wharf, Bath Street) IP080 (240 Wherstead Road)	Although the implementation of the tidal barrier and raised defences would raise the level of protection, there is still a residual risk of flooding by either failure of the new defences, or overtopping in extreme events. Therefore flood risk assessment may be required at project assessment level to identify appropriate mitigation measures for the parts of the development that fall within Flood Zone 2 or 3 (e.g. through design).	IP188, IP039a, IP133 and IP080: Flood risk is identified on the site sheet. Policy DM4 addresses this including the requirement for site specific flood risk assessment. IP200 has planning permission/resolution to grant and flood risk is identified in Appendix 3B
IP031 (Burrell Road) IP169 (23-25 Burrell Road) IP047 (Land at	Although the implementation of the tidal barrier and raised defences would raise the level of protection, there is still a residual risk of flooding by either failure of the new defences, or overtopping in extreme	IP169 and IP047 have planning permission or a resolution to grant and flood risk is identified in Appendix 3B. IP031 will be 'safe' (as defined through the Strategic Flood Risk Assessment) after the completion of the tidal barrier

Commercial Road)	events. Therefore flood risk assessment may be required at project assessment level to identify appropriate mitigation measures for the parts of the development that fall within Flood Zone 2 or 3 (e.g. through design).	provided measures are put in place as advised by the SFRA to deal with residual risk. The site sheet already mentions flood risk. Policy DM4 and the Planning and Flood Risk SPD provide the means to resolve any issues fully at planning application stage.
IP047 (Land at Commercial Road)	Mitigation could include archaeological monitoring and recording of initial groundworks with contingency for fuller archaeological recording if deemed necessary; recording the remaining railway features; checking whether any trace of the dock tramway survives; and a palaeoenvironmental sampling strategy.	IP047 has planning permission and Appendix 3B identifies potential archaeological concerns.
IP083 (Banks of the river upriver from Princes Street)	Opportunities could be sought to enhance the existing habitat.	The potential wildlife interest of the site is identified on the site sheet and DM31 states that all development is encouraged to incorporate enhancements for biodiversity.
IP083 (Banks of the river upriver from Princes Street) IP015 (West End Road surface car park)	Flood risk assessment may be required at project assessment level to identify appropriate mitigation measures for the parts of the site allocations where housing may be built (e.g. through design).	IP083 is allocated as public open space which is identified as 'water compatible development' in the Planning Practice Guidance. Flood risk is identified on the Site Sheet for IP015 and would be addressed through DM4.
IP094 (Land to rear of Grafton House)	TPO is identified at IP094 and application for Tree Works may be required.	The site sheet already refers to the TPO but reference has been added to the possible need for an application for Tree Works.
IP051 (Old Cattle Market Portman Road)	A separate transport assessment may be required for IP051 due its size and close proximity to Ipswich football club stadium	Paragraph 9.101 states that the Council would require a transport assessment for developments of 1,000sqm or more.
Numerous sites	Flood risk assessment may be required at project assessment level to identify appropriate mitigation measures for the parts of the development that falls within Flood Zone 2 and 3 (e.g. through design).	This is addressed through DM4 and the Flood Risk Supplementary Planning Document.
IP096 (Car Park Handford Road East)	Mitigation measures should be put in place to ensure any potential impacts upon the site and local nature reserves are avoided or minimised. Development should be sensitive to the natural environment of the river and protect biodiversity resources.	The County Wildlife Site and Local Nature Reserve running along the river is identified in the Site Sheet, protection of which is addressed through DM31.
Further mitigation related to cumulative effects		

General comment (see 4.3.3 of SA Report for Site Allocations DPD)	Mitigation should also be implemented to encourage measures to reduce potable demand, use of rainwater harvesting and greywater recycling systems to reduce domestic water use.	This is addressed through CS1 and DM4.
General comment (see 4.3.3 of SA Report for Site Allocations DPD)	The development on brownfield sites should be encouraged where appropriate.	This is addressed by CS9.

Appendix 2:

**Annex to Post-Submission Main Modifications Sustainability Appraisal Report
Addenda - Addressing Recommendations, October 2016**

https://www.ipswich.gov.uk/sites/default/files/annex_to_sa_addenda_october_2016.pdf

Ipswich Local Plan

Annex to Post-Submission Main Modifications Sustainability Appraisal
Report Addenda - Addressing Recommendations
October 2016



IPSWICH
BOROUGH COUNCIL

Planning and Development
Ipswich Borough Council
Grafton House, Russell Road
Ipswich IP1 2DE
(01473) 432019
Email: planningpolicy@ipswich.gov.uk
website: www.ipswich.gov.uk

Introduction

Sustainability appraisal, incorporating the requirements for Strategic Environmental Assessment, involves the assessment of each Ipswich Local Plan policy against defined sustainability objectives. It has been carried out at each stage of plan preparation, including the Post-Submission Main Modifications to the Proposed Submission Core Strategy and Policies development plan document review (known as the 'Core Strategy review') and the Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document (known as the 'Site Allocations Plan'), October 2016.

The full Sustainability Appraisal reports can be viewed on the Council's website at www.ipswich.gov.uk.

Review of Recommendations

The sustainability appraisal addenda, which consider the impacts of the Post-Submission Main Modifications to the Local Plan, contain several recommendations for mitigation. They relate to the Post-Submission Main Modifications to Core Strategy review policy DM34 Countryside, and the Post-Submission Main Modification to the Site Allocations Plan policy SP5 to allocate land at Futura Park, Nacton Road, site reference IP141a, as employment land, rather than a Strategic Employment Site (previous allocation policy CS13). The sustainability appraisal recommendations are set out in the table below. The right hand column of the table indicates where an amendment has been incorporated into the Local Plan in response to the recommendation, or if this was not considered necessary, how the recommendation would be addressed through other policies.

The remainder of the recommendations contained in the addendum reports repeat recommendations made at earlier stages in plan preparation, which the Council has addressed through the document 'Annex to Proposed Submission Sustainability Appraisal Reports – Addressing Recommendations December 2014' which can be viewed in the Core Document Library, reference LPCD36.

Policy	SA recommendation / conclusion	Amendment/Justification
DM34	It is recommended that should major residential development be permitted, adequate waste and recycling facilities should be provided.	This is addressed by policy DM5: clause g. refers to waste storage provision and paragraph 9.56 states that 'Provision for waste storage should support the aim to increase recycling.'
DM34	It is recommended that should major development be permitted in the countryside, adequate public transport should also be provided.	This is addressed by policy DM17: clause f. refers to public transport within 400m of new development.
SP5 IP141a	However, construction waste can be partly mitigated by maximising reuse and recycling, and operational waste can be mitigated by encouraging waste separation and collection	This is addressed through CS4, which aims to minimise the amount of waste generated during construction and throughout the lifetime of a building, and the DM5 requirement for waste

	measures, or potentially more specific reuse, recycling or composting schemes.	storage to be incorporated, which can support waste recycling (paragraph 9.56).
SP5 IP141a	Sustainable modes of transport should be encouraged.	This is addressed through policy DM17 and also the site sheet prepared for the site allocation, which refers to the need for a transport assessment and travel plan.
SP5 IP141a	It is recommended that during construction, and where appropriate operation, features should incorporate sustainability measures (e.g. energy efficiency measures, water efficiency and recycling, waste separation areas) and SuDS features.	This is addressed through policies DM1 (in relation to energy efficiency and water efficiency), CS4 and DM5 (in relation to waste recycling) and DM4 in relation to SuDS.
SP5 IP141a	Where appropriate SuDS should be incorporated into design.	This is addressed by DM4 which requires the appropriate application of SuDS.
SP5 IP141a	The function of the wildlife corridor should be maintained by preserving or replacing, and creating and enhancing appropriate habitat into and through the site. The sites should be accompanied by appropriate survey and measures to protect nearby biodiversity features.	This is addressed through DM31 and the site sheet also refers to the adjacent wildlife corridor.
SP5 IP141a	It is recommended that design should be in keeping with existing surroundings.	This is addressed through policy DM5 and also DM8 in relation to heritage assets.
SP5 IP141a	Linkages between businesses should be sought with the existing employment areas. This would extend the scope of investment in the area. The cumulative effect of these sites is likely to be positive in combination with the existing employment areas.	The site is well located in the Nacton Road corridor adjacent to Employment Areas 14 and 15 and, therefore, well placed to enable such linkages to be established. Accessibility is addressed through CS5 and DM17.
SP5 IP141a	Secured by design principles should be considered during the design stage.	Safety and security is addressed through policy DM5, clause a. referring to safe layouts, and c. to promoting safe and secure communities.