

# Sustainability Appraisal

(incorporating Strategic Environmental Assessment)

Ipswich Local Development Framework

## Preferred Options

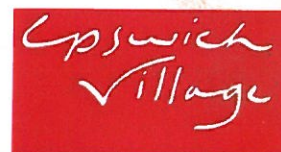
November 2007

CORE STRATEGY AND POLICIES

IP-ONE AREA ACTION PLAN

SITE ALLOCATIONS AND POLICIES

one-**ipswich**



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**IPSWICH**  
BOROUGH  
COUNCIL



# **Sustainability Appraisal**

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## **Ipswich Local Development Framework**

### **Preferred Options November 2007**

Core Strategy and Policies  
IP-One Area Action Plan  
Site Allocations and Policies

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**Suffolk County Council**



**Sustainability Appraisal  
(incorporating Strategic Environmental Assessment)**

**of**

**Core Strategy Preferred Options  
IP-One Area Action Plan  
Site Allocations and Policies**

**For Ipswich Borough Council**

**January 2008**

**Prepared by the Research & Monitoring Group, Strategic Development Division,  
Environment and Transport Directorate in association with Ipswich Borough Council**



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# 1. NON-TECHNICAL SUMMARY

## 1.1. Non-technical summary

The aim of sustainability appraisal is to promote sustainable development by ensuring environmental, social and economic factors are considered during plan preparation. It is a statutory requirement stemming from the Planning and Compulsory Purchase Act 2004, the same Act that replaced Local Plans with the Local Development Framework. In addition European Directive 2001/42/EC requires Strategic Environmental Assessment to be undertaken to assess the effects of plans specifically on the environment. Government guidance (2005) requires Sustainability Appraisal and Strategic Environmental Assessment to be undertaken together as the processes are very similar. Sustainability appraisal encompasses Strategic Environmental Assessment as the former looks at environmental, social and economic impacts.

This report sets out the results of the sustainability appraisal of three Ipswich Borough Preferred Options Development Plan Documents that will when formally adopted, form part of its Development Plan Framework. These are Core Strategy and Policies, Site Allocations and Policies and the IP-One Area Action Plan.

Baseline information on key aspects of the environment, economy and society are reviewed to reveal the key issues for Ipswich. Twenty two sustainability appraisal objectives were identified building on County wide work and the results of local views stemming from consultation in Ipswich. Their compatibility with the ten plan objectives was high with every sustainability objective having at least one policy positively compatible.

Sixty-five Policy Area were appraised, all with at least one of two alternatives. Only one policy was outscored by an alternative, suggesting a compromise on its future wording:

Policy Area 24: Provision of health services – Active support for the establishment of new GP surgeries should be included in the final core policy wording. This would strengthen the implementation of the plan in the longer term in achieving the outcome of increasing access to key services. The current preferred policy seems to concentrate on site specific issues and hence does not have a longer policy view to deal with possibly currently unanticipated developments in the future.

The appraisal revealed a number of aspects that needed to be mitigated, some of which are achieved by the application in tandem of other policies so not further action is required. The following sets out the common themes emerging that need to be addressed when constructing the final wording of the preferred policies:

Flood risk: There is a need to include mention of the need for design sensitive to flood risk for properties in flood zones in the short to medium term before the tidal barrier is completed. This is not adequately included in any of the proposed policies and it is needed to enable sustainable development to take place in the short and medium term.

Use of previously developed land: A presumption in favour of developing previously developed land before greenfield is included in the vision but it would be helpful to mention it in the supporting text to remind users of the plan that this is overriding national policy.

Carbon neutral, renewable energy schemes, Combined Heat and Power – It is noticeable that these are not promoted in the plan even though large scale high density development is proposed where these could be practicable. Support for these should be expressed and would link with policy area 28 (carbon footprint).

Waste minimisation – the plan overall appears to do little to encourage waste minimisation. Reference to residential and non residential development conforming to BREAM standards of construction incorporate design aspects to ensure that new development has planned space for 3

bins to facilitate recycling. On going work linked to the Business Improvement District (BID) is seeking to reduce the distribution of plastic carrier bags. This aspect needs to be included in detail in Policy Area 28 Carbon Footprint.

Biodiversity – This is another aspect where the plan has not scored well. This highlights the need for strong wording to be included in Policy Area 31 Protecting our assets which at the moment is a bit of a catch –all (covering natural, built and cultural). Judging by the relatively low scores for the Sustainability Appraisal objectives 9 and 10 covering sites of historical importance and distinctive landscape and townscapes, Policy Area 31 is not very effective in implementing protection for them either. The policy needs to be amplified so that it seeks not to just protect assets but to enhance them as well.

Carbon footprint - The appraisal suggests that the plan policies are not very effective in reducing contributions to climate change despite Policy Area 28 covering the carbon footprint. It is recommended that the wording of Policy Area 28 makes specific reference to energy minimisation, including support for renewable energy schemes, waste minimisation and recycling and support of sustainable transport.

Sustainable transport - Negative effects recorded for reducing traffic, air quality and encouraging efficient patterns of movement in support of economic growth suggested the plan lacks a clear statement encouraging the use of sustainable modes of transport. Policy Areas 13 Residential Planning gain tariff and 19 Non residential planning gain tariff both need to make clear that they will be seeking contributions to improvements to sustainable modes of transport (public transport, cycling and walking). They currently only refer to “transport” and major capital infrastructure associated with growth. Smaller scale sustainable infrastructure needs to be provided and the plan needs to be clear that it promotes the use of sustainable transport by residents and visitors.

## **1.2. Core strategy likely significant effects**

The overall conclusion is the implementation of the preferred policies as a group of policies that can in parallel, are appraised as having the potential to improve sustainability in Ipswich Borough in the long term. The most likely significant effects appear to be on facilitating improvements to health, quality of life and provision of housing. High cumulative scores are also recorded for reducing poverty which is linked to the availability of employment plus improving air and water quality (mainly due to air quality impacts stemming from traffic management), improved access to services and economic growth. These are perhaps the areas you would hope to see high in an urban context so it is encouraging that the appraisal suggests many of the policies proposed contain components that should lead to these outcomes.

The weakest sustainability aspects stemming from the cumulative appraisal of the policies are for the reduction of waste, climate change and biodiversity. However these can easily be strengthened through the final wording of policies and supporting text to remind plan users of national policy in these areas.

## **1.3. IP-One Area Action Plan likely significant effects**

The overall effect is positive, with the greatest effects anticipated for encouraging jobs and efficient patterns of movement to support economic growth. This is likely to be associated with indigenous and inward investment and revitalisation of the town centre. There is likely to be a strong positive correlation between these aspects of sustainability and with improving the health of the population. The SA also suggests that the plan will help improve the quality of life of people living in the area.

The negative cumulative effects are similar to issues picked up in the Core Strategy although biodiversity is a greater concern in IP-One. It is little mentioned in the policies and relies on the Core Strategy policy of protecting assets. There is a need for sites to be assessed for biodiversity potential although it is recognised that the likelihood of protected species is more limited in the busy, bustling town centre environment. Flooding is a higher risk as the plan covers central Ipswich where the flood concerns are the greatest. The positive cumulative impacts described above



assume that the flood concern is mitigated, by the development of the flood barrier and short term design mitigation.

The main outcomes of the appraisal confirmed the concerns raised in the Core Strategy about the biodiversity, reduction of waste and energy conservation. These areas are not mitigated by other policies in the IP-One plan. The recommendation is that the Core Strategy be strengthened and that the need to consider biodiversity potential of IP-One sites is mentioned/cross referenced in PA 61 Environmental Improvements.

Concerns picked up in the appraisal of PA 43 allocations for employment including development on landfill sites and provision of storage space for cyclists. Mitigated could be achieved by covering the need for careful planning on such sites in PA 50 Design and amenity in the town centre.

One new indicator on the take up of parking spaces is proposed for monitoring. This is to ensure that there is not a shortfall in the area of the University. If car parks appeared to be at capacity then specific research would be needed to check that access to higher education was not being curtailed through lack of ability to use private cars in particular circumstances.

#### **1.4. Site allocations and policies likely significant effects**

For the most part the overall effect of the three main Policy Areas is positive. There are a few issues associated with the site-specific proposals contained within the Appendices. There were four main issues which emerged.

Firstly, the need to address flood risk at a strategic level. Secondly, to ensure that an assessment of the ecological value of sites proposed was undertaken. Thirdly, that to minimise possible negative impacts of development and maximise possible positive impacts there are often requirements for development to be planned and designed in a way which, for instance, avoids the removal of protected trees, and preserves sites which are of archaeological importance. Fourthly, where development may be concentrated on specific parts of the town it would be expected that consideration might need to be given to identifying required major pieces of infrastructure within the relevant development plan document or ensuring the timely provision of enhanced or new services (e.g. doctors surgery, bus service or recycling scheme).

#### **1.5. Difference the process has made**

The Borough Council has been working on its sustainability appraisal alongside the development of its Local Development Framework. As an example a Scoping Report was produced and consulted upon during the Issues and Options phase of the Framework Process.

The work behind this written up Appraisal has informed the production of the Preferred Options documents and ensured that social, environmental and economic impacts are considered as options and preferences are developed. It is however recognised that this is not a static process and that this Appraisal should provide pointers for the Council as it considers comments on its Preferred Options and thereafter as it moves forward to submitting its development plan documents to the Government. The process set out within this document should also assist others with their responses to the Council and also to enable objective assessments of any alternatives that people may wish to put forward.

#### **1.6. How to comment on this report**

If you would like to comment on this report, please contact:

Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

Tel: 01473 432019 Web: [www.ipswich.gov.uk](http://www.ipswich.gov.uk) Email: [planningandregeneration@ipswich.gov.uk](mailto:planningandregeneration@ipswich.gov.uk)  
Comments should be submitted to the Borough Council by 5pm on 25<sup>th</sup> February 2008.

**SECTION B**

**INTRODUCTION**

## 2. INTRODUCTION

### 2.1. Purpose of the report

European Union Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes regulations 2004 require an assessment of the environmental effects of certain plans and programmes, known as Strategic Environmental Assessment (SEA). This legislation applies to plans and programme, and modifications to them, whose formal preparation began after 21 July 2004 (or those that have not been adopted, or submitted to a legal procedure resulting in adoption by 21 July 2006).

The objective of an SEA is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development.

Ipswich Borough Council is currently undertaking work on its Local Development Framework (LDF), in line with the revised planning system for development plans under the Planning and Compulsory Purchase Act 2004. This legislation also requires a sustainability appraisal (SA) to be undertaken on all relevant documents. The requirements of the SEA Directive have been incorporated into the requirements of the 2004 Act. SA is an iterative process that follows the various stages of plan preparation and looks at likely environmental, social and economic effects.

This SA is in six parts and covers three Development Plan Documents (DPDs) being prepared by Ipswich Borough Council (IBC):

Section A – Non-technical summary of all 3 DPDs.

Section B - Sets out the approach taken to SA, method of assessment, background information on the current issues in Ipswich and describes the sustainability objectives. It fulfils “Stage A” of the SA requirements for the 3 plan documents prepared by Ipswich Borough.

Section C – Core Strategy and Policies. This sets out the SA of this Plan document.

Section D – Site Allocations and Policies. This sets out the SA for the specific site allocations and 3 policies that focus on sites that may be allocated for physical development, or retained for open space or nature conservation purposes.

Section E - IP-One Area Action Plan. This sets out SA including site specific appraisal results for Policies suggesting uses for identified land areas.

Section F - Appendices

### 2.2. Compliance with SEA directive and regulations

This SA is intended to fully comply with the requirements of the SEA Directive, as set out in “A Practical Guide to the Strategic Environmental Assessment Directive” September 2005. Chapter **Error! Reference source not found.** sets out a quality assurance checklist designed to illustrate how the technical and procedural elements of the SEA process have been handled in this appraisal.

### 3. METHOD OF ASSESSMENT

#### 3.1. Approach adopted to SA

Sustainability appraisal (SA) is an iterative process that follows the various stages of plan preparation. It is a statutory requirement stemming from the Planning and Compulsory Purchase Act 2004, the same act that replaced Local Plans with the Local Development Framework (LDF). In addition European Directive 2001/42/EC, transposed into UK law in July 2004, requires Strategic Environmental Assessment (SEA) to be undertaken to assess the effects of plans and programmes specifically on the environment. Government guidance (2005) requires SA and SEA to be undertaken together as the processes are very similar. SA encompasses SEA as the former looks at environmental, social and economic impacts.

The stages for appraisal are set out below.

*Table 3.1: The stages of a Sustainability Appraisal*

<b>Stage A: Setting the context and establishing the baseline</b>
<ol style="list-style-type: none"> <li>1. Identifying other relevant plans, programmes and environmental protection objectives</li> <li>2. Collecting baseline information</li> <li>3. Identifying environmental problems</li> <li>4. Developing SEA objectives and testing their compatibility</li> <li>5. Consulting on the scope of the SEA</li> </ol>
<b>Output: Scoping Report</b>
<b>Stage B: Developing and refining alternatives and assessing effects</b>
<ol style="list-style-type: none"> <li>1. Testing the plan objectives against the SEA objectives</li> <li>2. Appraising strategic alternatives</li> <li>3. Predicting the effects of the plan, including alternatives</li> <li>4. Evaluating the effects of the plan, including alternatives</li> <li>5. Mitigating adverse effects</li> <li>6. Proposing measures to monitor the environmental effects of implementing the plan</li> </ol>
<b>Stage C: Preparing the Sustainability Appraisal Report</b>
<ol style="list-style-type: none"> <li>1. Preparing the Sustainability Appraisal Report</li> </ol>
<b>Output: Sustainability Appraisal Report</b>
<b>Stage D: Consulting and decision making</b>
<ol style="list-style-type: none"> <li>1. Consulting on the draft plan and Sustainability Appraisal Report</li> <li>2. Appraising significant changes</li> <li>3. Appraising significant changes resulting from representations at the DPD Examination</li> <li>4. Decision making and provision of information</li> </ol>
<b>Output: Sustainability Appraisal Statement</b>
<b>Stage E: Monitoring implementation of the plan</b>
<ol style="list-style-type: none"> <li>1. Finalising aims and methods for monitoring</li> <li>2. Responding to adverse effects</li> </ol>
<b>Output: Included in Annual Progress Report on Plan implementation</b>

The following summarises the approach taken at each stage of the appraisal.

#### Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

Ipswich Borough published a Scoping Report in March 2006 to cover the three DPD documents it was preparing: Core Strategy and Policies; IP-One Area Action Plan; and Site allocations and policies. This was sent out for public consultation including statutory and key stakeholders for 6 weeks in March – April 2006. Ipswich Borough also commissioned TRL Ltd to undertake an independent assessment of compliance with the SA regulations.

#### Stage B: Developing and refining options and assessing effects

The TRL report (2006) recommended that SA be undertaken on the Issues and Options documents prepared for the three DPD documents in 2006. Ipswich Borough undertook this work



using the approach published in the Scoping Report. Detailed assessment sheets exist for all the policy options being considered at that time and with notes on the sheets explaining the actions that would be taken in the next iteration of policy development. The policies of all three documents have moved on considerably and it was considered most helpful to the process of assessing sustainability, to reassess the policies as they now appear, with their alternatives. This has been undertaken in this report and presents the opportunity to consider the sustainability of the emerging plan with an opportunity to fine tune policy wording as a result of the public consultation comments on the plans and the SA.

#### Stage C: Preparing the Sustainability Appraisal Report

The Sustainability Appraisal for Regional Spatial Strategies and Local Development Documents guidance published by the ODPM (now the Department for Communities and Local Government) has been used in preparing this report. Ipswich Borough provided a large amount of background information including sustainability appraisal sheets of the original issues and options and alternatives considered plus site specific sheets showing the location of land options and 7 environmental constraints. The SA Report has been produced to go out with the three DPD for public consultation.

The method of appraisal takes the SA Framework (see section 5.3) and considers the possible positive or negative effects of the proposed policy and of any alternative approaches. Comparison of the results reveals if the alternative has any additional sustainability merits. If yes then these are noted and recommendations made for adjustment to improve the sustainability outcome. The preferred policies are considered as a group to check that they are likely to have a net sustainable effect. This enables the strengths and weaknesses of the plan documents in terms of sustainability objectives to be identified. The ability to mitigate shortcomings are documented – sometimes no actions are required because policies are designed to act in tandem. In other cases it may be necessary to recommend inclusion of sustainability aspects in the policy wording. Sometimes things cannot be mitigated and because it is not certain that a negative effect will result, monitoring is required so that regular review will highlight if a problem is occurring and needs mitigating action to be taken.

#### Stage D: Consulting on the Sustainability Appraisal Report

Ipswich Borough will consult with the public, statutory consultees, stakeholders and any other interested parties on the three DPDs and the Sustainability Appraisal. Comments received on both documents will be taken into consideration when refining the plan policies and IBC will deal with appraising any significant changes to the plan.

### **3.2. How the Sustainability Appraisal was carried out**

SA has been on going for the 3 DPD documents since the publication of the Issues and Options papers in 2006. A series of appraisal sheets were written up, together with recommendations for changes. However in the interests of making this SA report as useful to the plan preparation process as possible, and because the change between the Issues and Options and Preferred options has been so great, this SA focuses on the sustainability of the Preferred Options for papers about to go out to public consultation. At this stage only the topics to be covered by policies are detailed; precise wording of policies is not given. Many new policy areas and alternatives have been identified since the Issues and Options stage. Hence this SA report does not include all the results of the Issues and Options work, only a summary of the main changes made (Appendix 1). A justification for the suggested approach accompanies every preferred policy in the plans.

### **3.3. Who carried out the Sustainability Appraisal**

The sustainability appraisal was carried out by the Research and Monitoring team within the Environment & Transport directorate at Suffolk County Council.

### **3.4. Who was consulted, when and how**

The SA Scoping Report went to consultation in March 2006, and was sent to the statutory bodies, i.e. the Environment Agency, English Heritage, the Countryside Agency and English Nature (before their merger), key stakeholders as well as Suffolk County Council.

### **3.5. Limitations of the assessment**

While every effort has been made to pick up on all the points raised by TRL in their verification report, it has not been possible in the timescale given to do everything. Current issues in Ipswich have not been comprehensively updated but information included in the DPD documents has been included in the SA.

### **3.6. Technical deficiencies**

There have been no major technical difficulties other than the availability of time to undertake the appraisal. With SA being an iterative process there are always difficulties in knowing when the best point is to undertake the appraisal and to write it up. A balance has been struck to keep this document to a user friendly size by omitting all the issues and options appraisal tables. It focuses on considerations that will help the next phase of development of the plan documents.

### **3.7. Lack of information/knowledge**

Section 4.4 below sets out where there is a lack of information for indicators identified as relevant to the SA Framework. Current information on total numbers of foreign migrants is limited. A particular problem concerns indicators that measure climate change. In this appraisal this is covered by objective 13 (Greenhouse gas emissions from energy consumption), which looks at measures of electricity and gas consumption and energy efficiency of homes. Energy consumption by vehicles is not covered because petrol consumption figures are not available. However this should not deter us from commenting on the implications for carbon emission that would occur with actions that result in longer/more car trips.

### **3.8. Appropriate Assessment**

According to the terms of the Habitats Directive (Article 6(3)), any plan that has a significant effect upon a site protected by the directive (Special Areas of Conservation, Special Protection Areas and Offshore Marine Sites) is subject to an appropriate assessment. The East of England Regional Spatial Strategy Habitats Directive Assessment (December 2006) raises concerns that the level of housing development within 5km of Natura 2000 and Ramsar sites could have a significant impact. The location of Ipswich to the Stour and Orwell Estuaries SPA and RAMSAR is highlighted.

During the course of undertaking the Sustainability Appraisal no issues have arisen from the Preferred Options that are considered to be likely to have a significant impact on any of these areas. This is principally because relevant sites in the Ipswich area are limited to parts of the Orwell Estuary - and these are effectively on the Borough boundary or outside it and the Preferred Options within the document are not considered to have significant direct impacts on that area. However further consideration should be given to undertaking a site specific Appropriate Assessment on UC061 as this site is the nearest to the SPA boundary (less than 1km) and is proposed for housing and employment development. As the area is a huge car park with high run off it is likely that any development of the site will be impact neutral or an improvement to the balance of impermeable to permeable area. One other site abutting the SPA was considered for development (UC266) but this has not been allocated because it is a greenfield site regarded as strategically important to biodiversity due to being adjacent to the SPA and RAMSAR.

However, it is possible that a secondary impact of the Ipswich flood barrier is that it may have an impact on the flow of the River Orwell, or change flooding patterns downstream of it. This may affect the Stour & Orwell Estuaries Special Protection Area on the southern edge of the borough. Therefore, it may be necessary to consider the possibility of carrying out an appropriate assessment of the flood barrier's effects when it reaches the planning stage.



## 4. STATE OF THE ENVIRONMENT IN IPSWICH, IP-ONE AND SUFFOLK

### 4.1. Description of the social, environmental and economic baseline characteristics

Ipswich is situated in the East of England region. The Borough of Ipswich covers an area of 3,981 hectares (or 15.37 square miles). It is the county town and administrative centre of Suffolk. The town is located on the River Orwell approximately 12 miles from the Suffolk coastline. To the south lies the picturesque Dedham Vale (known as 'Constable Country'), the county of Essex and the historic town of Colchester (approximately 20 miles away). To the north and west lies the more rural areas of Suffolk and to the east, the port of Felixstowe and the Suffolk Coast. Ipswich enjoys a significant catchment population of approximately 350,000.

The Borough of Ipswich is the sole 'urban-only' local authority in Suffolk. It has a population density of 29.4 people per hectare, significantly above the Suffolk average of 1.76.

### Social information

#### Population

Ipswich has a population of 117,074 (Census 2001). The age profile of Ipswich (Suffolk Observatory, 2003) is as follows:

- Under 15 years: 22,500 (19.2%)
- 15 – 64 years: 75,300 (64.1%)
- 65 years plus: 19,600 (16.7%)

Total Population Estimate = 117,400 (Suffolk Observatory, 2003)

The population of the Borough is predicted to rise by almost 20% by 2021 to 146,000. In terms of the age profile, the number of those under 15 years old is expected to rise by 5,500 (25%) to 28,000. The over 65's group is expected to rise by 3,400 (18%) to 23,000. The largest proportional increase, as you would expect, is in the 15-64 years age range where the population is expected to rise by almost 20,000 (26%) to 95,000.

Census 2001 indicates that 90.8% of the population of Ipswich are classed as White British. The remaining 9.2% of the population cover a wide and diverse mix of other ethnic groups including White Other, Black Caribbean, Black African, Asian, Indian, Pakistani, Bangladeshi and Chinese.

Table 4.1 below sets out some of the town's latest vital statistics:

*Table 4.1: Vital statistics on Ipswich*

Population	117,000 (2001) 128,000 (2007)
Numbers of Employed People	67,310
Top Employment Sectors	20,348 (30.2%) Public Administration 16,377 (24.3%) Distribution 13,916 (20.7%) Banking
Unemployment rate (Sept. 2007)	3.2%
School Year 13 Destinations	49.14% Higher Education
Ethnic Group (non white British)	9%
Heritage	602 listed buildings, 10 scheduled monuments, 14 conservation areas and 3 registered parks, gardens and cemeteries.
Average Annual House Build (2001 to 2007)	645
% of Housing built on previously developed land 2006 / 2007	99

#### Deprivation

According to the Index of Multiple Deprivation 2004 (IMD), Ipswich (as a local authority area in England) is placed 136th out of a total of 354. According to the IMD 2007 Ipswich is placed 99<sup>th</sup>. This means an increase in the rank of 37 places, meaning that levels of deprivation have worsened



in Ipswich relative to the rest of the country. Several areas in Ipswich fall within the top 20% most deprived with one falling within the top 10%. At 2004, 1 in 3 of the population of Ipswich lived in an area within the top 25% most deprived areas in England. 7% of the population live in an area which is within the top 10% most deprived in England. The IMD 2007 shows little change here, and any significant shift of deprivation is not evident.

#### Health & Well Being

The overall death rate in Ipswich (per 100,000 population) in 2003 was 645.0. This was significantly above the Suffolk average of 609.6. This figure is down on the previous year but still remains high for Suffolk. The average life expectancy for men in Ipswich is 76.6 years and for women it is 81.3 years.

#### Education and Skills

Ipswich fares comparatively well when looking at education indicators. It scores above the Suffolk average in GCSE attainment levels (63.5%) and average point scores (273.8). However, Ipswich has the second highest proportion of its population in Suffolk with no qualifications (33.6%) and the second lowest proportion with NVQ level 4 or higher (22.3%).

#### Crime and Disorder

The crime rate in Ipswich has risen steadily and significantly since 2001. In 2004 it stood at 138.5 crimes per 1,000 population, the highest crime rate in Suffolk. Burglary also scores highly and with 16.7 recorded burglaries per 1,000 population in 2004, it too is the highest rate in Suffolk. Both of these rates are above the average rate for England and Wales.

#### Access To Services and Facilities

Access to services and facilities is generally good in the Borough due to its compact urban character. 29% of households in Ipswich do not have access to a private car. However, there are predominantly good public transport links providing good accessibility to key services and facilities across the Borough.

#### Employment

The average earnings for those in full-time employment in the Borough of Ipswich in 2004 was £22,647. This compares with the Suffolk figure of £24,940. Whilst average earnings have increased since 2002, in Ipswich they still fall approximately £2,000 below the Suffolk average.

Unemployment in the Borough has fallen slightly over the period 2003-04. It is currently at 3.6% which is high in comparison to the East of England average of 1.8%. Long term unemployment (longer than 12 months) stands at 22.2% of those unemployed (0.7% of the total workforce). This is still significantly higher than the Suffolk average in this instance.

The draft Regional Spatial Strategy (RSS) requires 18,000 new jobs to be located in the Borough of Ipswich. Through analysis of trends in existing sectors and projections of future demand, suitable employment sites and developments will need to come forward to meet this requirement. The Ipswich LDF will have a key role in this work.

#### Housing

As of April 2004 the Borough had a housing stock of 53,220 properties. Census 1991 states that Ipswich had 47,748 households. Census 2001 states that Ipswich had 49,869 households. This shows an increase of over 2,000 households from 1991 – 2001. Of the Census 2001 total, some 8,159 units were Council-owned; 2,787 units were owned by Registered Social Landlords (RSL) and 32,275 units were owner occupiers.

In 2003/04, 1,322 people claimed to be homeless in the Borough of Ipswich. This rose from 1,249 the previous year and 1,054 in 2001/02. With a property price to income ratio of 5.6, it is apparent that home ownership is beyond the reach of a significant proportion of the population of the Borough.

The Council's planning policy sets a target of 25% affordable housing on all new brownfield developments and 30% on greenfield. This is not being met currently and the figure for 2003/04 of an average of 18.9% illustrates this.

An increasingly challenging housing target is coming forward from the draft RSS (15,400 dwellings in the period 2001 to 2021 (770 p.a.). This will mean that the need for housing quality in both design and choice will be increasingly vital.

## **Environmental information**

### Landscape and Biodiversity

Within the Borough we have a number of County and Local Wildlife Sites and well as a Site of Special Scientific Interest and 17 hectares of Areas of Outstanding Natural Beauty (AONB).

### Historic and Archaeological Environment

There are 610 listed buildings in the Borough of which 13 are Grade I. There are 13 Conservation Areas covering the historic areas of the Borough. There has been little change in the number of listed buildings in the Borough since 1995. As of 2004, 92% of all the Conservation Areas in the Borough had been the subject of character appraisals (12 out of 13), the highest percentage coverage in Suffolk.

### Water and Air Quality

There is limited information on this for the Borough at this stage. It is intended to acquire relevant information to update the baseline data in due course. Indicators have been identified and set to monitor progress.

### Soil Resources

A significant way of reducing the impact on soil resources and protecting them is by concentrating new housing development on previously developed land (PDL). The percentage of completed new development on PDL in Ipswich in 2003/04 was 71.6%. The percentage has been consistently high since 1998/99 with the highest being 89.7% in 2000/01. This is likely to be exceeded in 2004/05 as development on PDL will be 97.8%. The Regional target of 50% (RPG6) is exceeded in Ipswich.

### Waste

There is a general increase in the amount of household waste being recycled in Ipswich year on year since 2002/03. However, the total amount of household waste is also increasing each year. More waste will be recycled with the roll out of dry recyclables (blue bins) and garden waste (brown bin) collections in 2005/06.

### Traffic

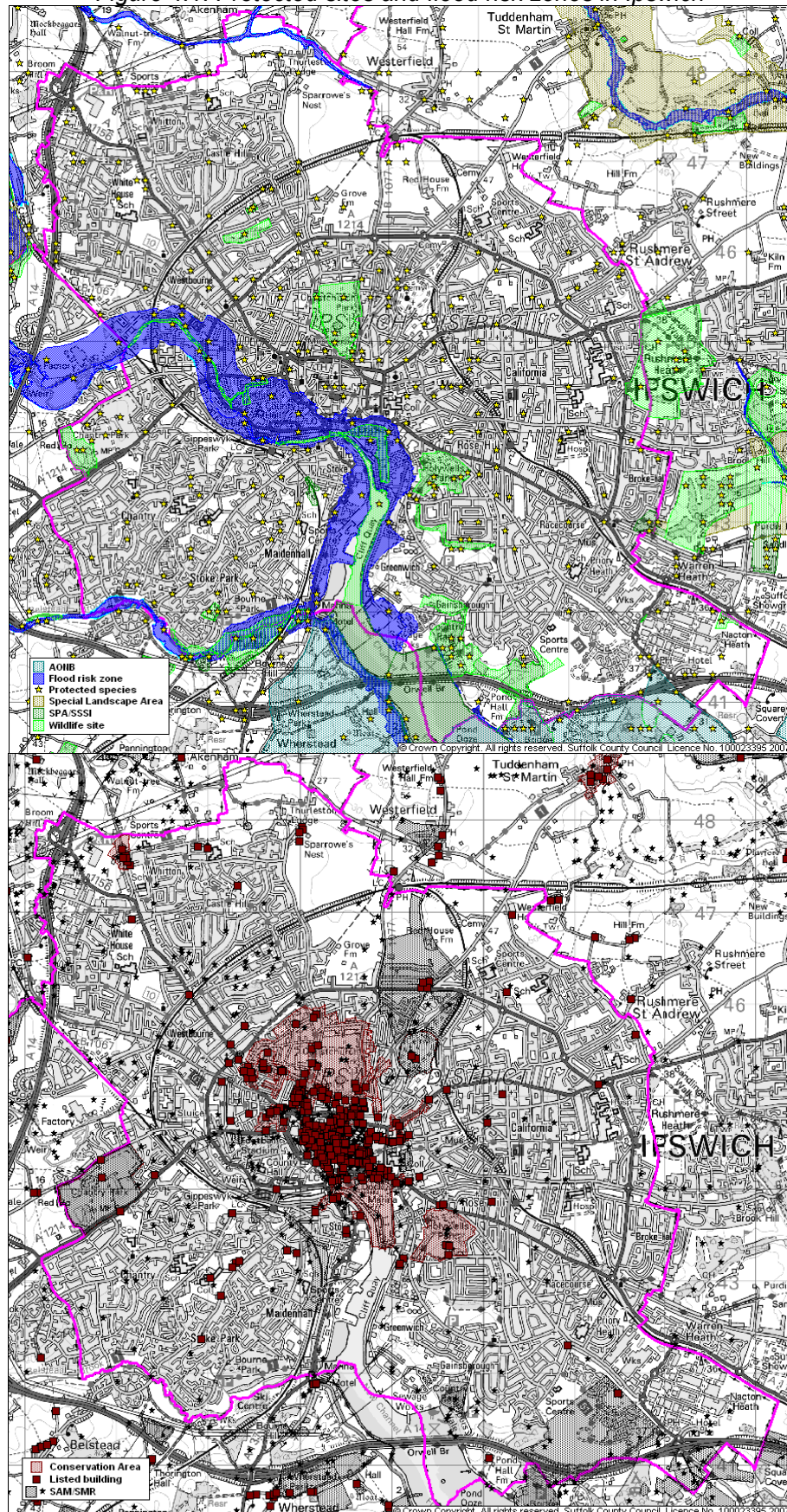
Traffic volumes have steadily increased each year in Ipswich since 1999. The bulk of this increase is due to the increase in car use, especially with regard to journeys to work. However, it is important to note that Ipswich does have the highest percentage of journeys to work in Suffolk taken by sustainable modes and this will continue to be improved upon.

Most residential development will be built on PDL in Ipswich and considerations of proximity to bus routes, cycling and pedestrian access are taken into account at the planning application stage. This will assist in reducing the need for local travel by the car.

### Climatic Effects and Climate Change

The Environment Agency identifies areas at risk from flooding on flood risk maps. They also classify the probability of these areas flooding from rivers or the sea in any one year as 'significant' (greater than 1 in 75), 'mediocre' (less than 1 in 75 but greater than 1 in 200) or 'low' (1 in 200 or less). These assessments are based on the presence and effect of all flood defences, predicted flood levels and ground levels.

Figure 4.1: Protected sites and flood risk zones in Ipswich



Significant parts of the central area of Ipswich have a flood rating of 'low' to 'moderate'. This is mainly focused on the area between the River Orwell and the town centre, Waterfront and Ipswich Village areas.

The Home Energy Conservation Act 1996 requires local authorities to set a target for the improvement in energy efficiency of the total housing stock. Ipswich has a target of a 30% increase by 2011. The 2003 figure showed a 13.5% improvement. There is still some way to go to meet this challenging target but Ipswich is moving in the right direction towards it.

## **Economic information**

### Business Sectors

The main sectors of employment in Ipswich are public administration, education and health; distribution, hotels and restaurants; and, manufacturing. Each of these sectors is above the Suffolk and regional average.

### Business Start Ups

The rate of business take-up can often be considered as an indicator of the vitality of a local economy. The business formation rate (as measured by VAT registrations) is the highest in Suffolk and has increased each year since 2001. Trends show a constant increase in business start-ups since 2001.

### Take Up of Employment Land

Between 2000 and 2005 the take up of employment land has been relatively static. There have been no major increases in the period with the exception of small amounts of take up in 2001/02 and 2004/05.

### Town Centres

The percentage of retail units in Ipswich town centre that have an A1 use has fallen slightly in the last year. It currently stands at 65% whereas previously in 2001/02 and 2002/03 it stood at 68%. This is still clearly above the county average of 55% and the national average of 50%. Although, there has been a small decrease in A1 uses, this trend will continue to be monitored. The presence of a majority of A1 units in the town centre will help to stimulate and maintain vitality. The retention of A1 uses is, therefore, very important.

### Transport and Travel

The encouraging trend to note is that the number of journeys to work by sustainable modes is increasing. The volume of traffic, however, is also increasing, placing further pressure on existing infrastructure.

Improvements need to be made in order to make the environment more attractive to visitors and investors. This will boost the local economy and help to reduce the impact of traffic pollution on the environment.

Key transportation issues within Ipswich include the east-west routes across the town centre and the connections between the town centre and the Waterfront. Several schemes and programmes are in place to attempt to reduce the number of local journeys by car. Schemes are also being considered to improve the routes between the town centre and Waterfront.

## **4.2. The environment without the implementation of the plan**

It is difficult to predict the future in Ipswich without the implementation of the plan. The proposed plan includes the continuation of long standing policies as well as introducing new policies. Plans of other statutory agencies, trends in the economic environment and the impacts of climate change will all act alongside any hypothetical continuation of existing IBC policies. The issues and problems identified in 4.3 highlight the issues over and above the implementation of existing policy that we expect the new plan to address.



Other new challenges with potential sustainability implications include:

- Rising numbers of economic migrants from Europe, the role they play in the economy, their housing and cultural needs.

When the sustainability appraisal is undertaken it is based on what you consider will be the impact on the existing situation.

#### **4.3. Main social, environmental and economic issues and problems identified**

The scoping report lists the key issues and challenges for sustainable development in Ipswich in Table 7. They are grouped into social, environmental and economic issues:

##### *Social issues*

- Higher than average mortality due to respiratory disease.
- Number of homeless increasing year-on-year.
- Lack of suitable affordable housing (by type) available.
- Requirement for 15,400 new dwellings in the Borough by 2021.
- Ageing population

##### *Environmental issues*

- Rising volume of traffic
- Flood risk along River Orwell Corridor
- Increasing number of fatalities in road traffic accidents.
- Need for renewable forms of energy in new homes.

##### *Economic issues*

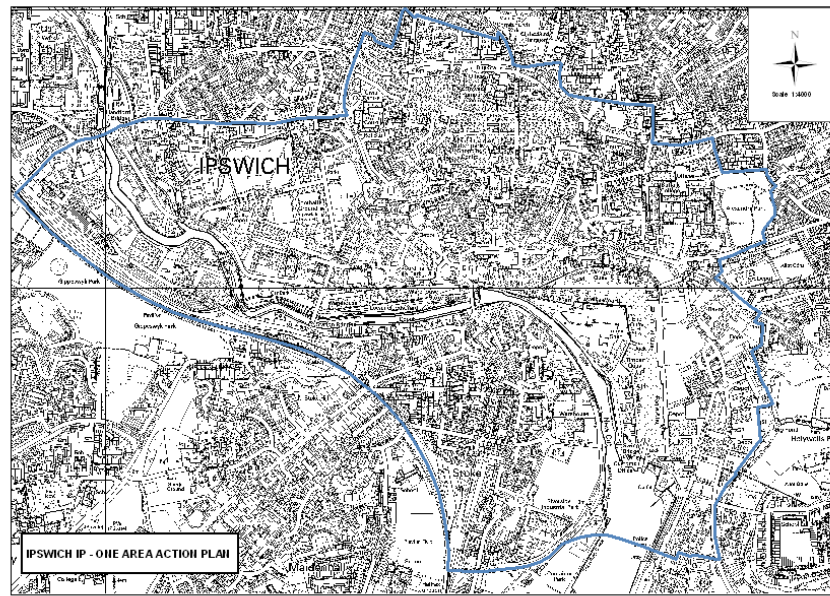
- Need to enhance and sustain the viability and vitality of the town centre and local centres.
- Need for suitable employment land (by use) and encourage increasing new business development.
- Need for more retail floorspace.
- Requirement for 18,000 new jobs in the Borough by 2021.
- Decrease in manufacturing employment.
- Increase in office-based employment

In addition to these general points, specific issues have been identified for the IP-One Area.

The sources of these issues are set out in the IP-One Area Action Plan. Some issues flow from the need to address the strategic planning framework that the draft Regional Spatial Strategy has created for Ipswich. Many issues are common to the whole of Ipswich, particularly those about how we should respond to the challenge of growth. The role of the IP-One Area Action Plan is to focus specifically on central Ipswich. Taking account of all these various sources, it is considered that there are ten key issues facing IP-One.

1. The need to attract a better range of higher quality shops to the town centre to provide for more diverse shopping opportunities and make Ipswich town centre the first choice for shopping;
2. Poor accessibility in some parts and the need to improve connections within IP-One. This includes challenges such as:
  - The Star Lane gyratory as a barrier to pedestrians walking between the town centre and the Waterfront, and a bottleneck to east-west vehicle movements;
  - Poor pedestrian and cycle routes between the railway station, central shopping area, Education Quarter and Waterfront;
  - The need to get shoppers and commuters into Ipswich in sustainable but convenient ways;
  - No single high quality public transport interchange within the town centre;
  - The gradual erosion of the town centre's urban form and structure over a number of years;

Figure 4.2: The area included within IP-One



3. The need to accommodate more people living within IP-One to avoid sterile, single-use areas and meet growth targets;
4. The need for additional facilities to support growth, change and urban renaissance – whether cultural, sporting, community or other facilities;
5. A weak image, not helped by poor ‘gateways’ to the town centre (such as St Matthews roundabout), and specific locations in need of improvement, such as Carr Street;
6. A need to continue the good work already done to make the best of the river corridor as an asset fully integrated into the town centre;
7. Old buildings needing new economically viable uses – especially redundant medieval churches - and how to make the most of widely dispersed buildings of historic interest within central Ipswich;
8. Delivering employment generation targets within IP-One and ensuring quality as well as quantity of jobs;
9. Addressing deprivation, health inequality and social exclusion so that everyone living within IP-One, as well as Ipswich and beyond, can share the benefits of the changes that take place and have equal access to opportunities;
10. Planning for the effects of climate change and the risk of flooding – areas of IP-One along the River fall within flood risk zones 2 and 3;

Also critical to this plan is the issue of how to deliver urban renaissance. Ipswich does not have a purpose-made delivery vehicle and will therefore need to mobilise existing investors, agencies and other key players to help address these issues.

#### **4.4. Limitations of information and assumptions made**

The baseline data is relatively comprehensive and has raised a number of important environmental issues. There are, however, many gaps in information remaining where information is currently incomplete or unavailable. Monitoring and research is ongoing at the Borough Council and data is continually received from external sources. It is hoped that these gaps in information can be filled over time so that the baseline can be fully set out and any missing trends identified.

At this stage, the topics/indicators where information is either limited, currently not available or where data requirements need to be defined are:

- Groundwater Quality
- Number of days of Air Pollution
- Achievement of Emission Level Values
- How Children Travel To School
- Accessibility To Key Services
- Level of Carbon Emissions By Cars
- Incidence of Fluvial Flooding
- Effects of Drought
- Effects of Wind Damage
- Effects of Heat
- Condition of SSSIs
- Bird Survey Results
- Condition of Key Habitats (BAPs)
- Planning Permissions Affecting Known or Potential Designated Assets
- Obesity
- Number of People Who Smoke
- Number of people with Type 2 Diabetes
- Provision of Open Space and Play Space
- Childcare
- Special Needs Housing (Types and Sizes)
- Comparative Industrial and Office Rental Costs Within The Borough
- Port Freight Carried By Rail
- Access To Adult Learning Opportunities

## 5. Sustainability objectives and criteria

### 5.1. Links to other policies, plans and programmes

Stage A of the SA process demands that the context in which the LDF is being prepared is considered and referred to within this document. The context refers to other relevant policies, plans, programmes, strategies and initiatives. The reason for the inclusion of other relevant documents and programmes is because they may act as an influence on the LDF. Environmental protection objectives are set out in many policies and legislation. These may influence the SA process and preparation of new LDF documents. Any relationship between plans and programmes must be identified so that advantage can be taken of overlapping sections and any inconsistencies and constraints dealt with. This review will help to identify issues and objectives that must be covered by SA.

The context review considers guidance that has been issued at the international, European, national, regional and local level with regard to the SA process. Targets and specific requirements of the plans, programmes and objectives have been identified and included where possible in the SA process. Environmental assessments conducted for any of the relevant plans, programmes and objectives may be useful sources of information that can act as baseline data. Environmental protection objectives that have been established so that the SEA Directive can be complied with must be carefully noted.

Appendix 2 contains a list of policies, plans and programmes that may influence the Ipswich LDF. Table 5.1 below provides a sample summary of the documents listed in Appendix 2. The tables also give an example of the relevant links between their environmental objectives and considerations for the development of documents within the Ipswich LDF. Therefore, this illustrates that when identifying new policies and proposals within the individual documents of the LDF, these other plans and programmes will need to be considered.

*Table 5.1: Example Summary of Related Plans and Policies (Task A1)*

Plan / Programme	Relationship to the LDF	Comments
<b>International</b>		
European Directives	Legislation from the European Commission regarding the protection of the environment. Translated through planning guidance and national legislation.	For example: EIA Directive, Water Framework Directive 'Habitats' Directive and the 'Birds' Directive
International UN agreements	Non-binding unilateral agreements regarding sustainability at varying levels.	For example: Rio Conference – Local Agenda 21; Kyoto; Aarhus Convention
<b>National</b>		
Planning Policy Guidance Notes and Planning Policy Statements	Government policy on various aspects of planning.	PPGs to be eventually replaced by PSSs
Government White Papers	Government statements of specific areas of policy.	For example: Transport White Paper
Planning Circulars	Guidance on specific issues that relate to planning	Various
<b>Regional</b>		
Regional Planning Guidance 6 (RPG6)	Sets out regional guidance for the preparation of local plans and LDFs.	
Regional Spatial Strategy (RSS) (draft)	Prepared by the East of England Regional Assembly (EERA)	Adoption expected in 2008.
Regional Economic Strategy	Prepared by the East of England Regional Assembly (EERA)	
Regional Transport Strategy	Prepared by the East of England Regional Assembly (EERA)	Produced in 2003.
Regional Sustainable Development Framework	Regional framework for sustainability in East Anglia.	Produced in 2002.
Regional Housing Strategy	Regional framework for housing.	

Plan / Programme	Relationship to the LDF	Comments
<b>Sub-Regional</b>		
Haven Gateway Employment Land Study	Breakdown of employment land demand and supply for Haven Gateway area (by district) and future needs to 2021.	Produced by DTZ Pidea in 2005.
Haven Gateway Housing and Infrastructure Study	Assessment and analysis of future requirements for the Haven Gateway area and component districts and boroughs.	Produced by Roger Tym & Partners in 2005
Haven Gateway Regeneration Study	Assessment of regeneration needs and potential in the Haven Gateway area and component districts and boroughs.	Produced by RHK Consulting in 2005.
Sub-Regional Housing Strategy (draft)	Sub-regional framework for housing.	Strategy for the period 2005 – 2010.
<b>County</b>		
Suffolk Structure Plan	County framework for development of local plans.	Produced in 2001.
Suffolk Local Transport Plan	County transport planning matters.	New LTP submitted for period 2006-2011
Suffolk Waste Local Plan	County waste planning matters	Produced in 2004.
Suffolk Replacement Minerals and Waste Local Plan	County waste and minerals planning matters.	In production. Expected to be completed 2006/07.
Suffolk Biodiversity Action Plan	County Biodiversity matters	
Suffolk Habitat Action Plan	County habitat matters.	
Suffolk Local Agenda 21 Strategy	County sustainability matters.	Produced in 2000.
<b>Local</b>		
Babergh Local Plan	Adjoining local authority.	Adopted in 2006.
Suffolk Coastal local Plan	Adjoining local authority.	Adopted in 2001.
Mid Suffolk Local Plan	Adjoining local authority.	Adopted in 1998.
<b>Ipswich Borough Council Plans, Policies &amp; Strategies</b>		
Corporate Strategy: Transforming Ipswich	Sets out the corporate goals of Ipswich Borough Council.	Produced in Summer 2005.
The Ipswich Prospectus: growth for prosperity	Sets out the future vision for Ipswich and an overview of the strategic aspirations of the borough.	Produced in September 2005
One-Ipswich Community Strategy	Sets out the borough strategy for community development.	Produced in 2004.
Adopted Ipswich Local Plan	Sets out the adopted planning policies and strategies for the borough.	Adopted in 1997.
First Deposit Draft Ipswich Local Plan	Sets out the amended and updated planning policies and strategies for the borough.	Draft document produced in 2001.
IP-One Area Action Plan	Focuses on the future development of central Ipswich	Produced as a draft LDD in 2003 by Urban Initiatives.
Economic Development Strategy	Objectives for the economic development of the borough.	Relates to policy development of the regeneration of Ipswich and employment land.
Ipswich Housing Strategy / Local Housing Needs Study	The aims of the borough for the provision of housing. Study has implications on housing supply issues.	Housing Needs Study produced in 2000.
Ipswich Retail Study	Sets out retailing demand and supply issues and forecasts capacity for Ipswich to 2016.	Produced by DTZ Pidea for Ipswich Borough Council in August 2005.
Cultural Strategy	Sets out the borough council's strategy with regards to culture.	Produced 2005.

Plan / Programme	Relationship to the LDF	Comments
Environmental Strategy	Sets out the borough council's strategy for enhancing and managing environmental quality.	Produced July 2007.
Area Investment Framework for Ipswich	Sets out a five-year framework for the co-ordination of regeneration investments in Ipswich.	Produced by DTZ Peda for Ipswich Borough Council in January 2004.

## 5.2. How and why the SA objectives were adopted

Ipswich's SA objectives are structured to take into account the Government's four themes for sustainable development which are:

- effective protection of the environment;
- prudent use of natural resources;
- maintenance of high and stable levels of economic growth and employment; and
- social progress that meets the needs of everyone.

Many of the indicators chosen come from within Ipswich Borough Council and the work of the Suffolk Sustainability Appraisal Group (SSAG), a multi-agency group including all the Suffolk Local Authorities. The indicators cover environmental, social and economic issues. For local purposes, the objectives have been grouped into themes that reflect those set out in the *One-Ipswich Community Plan* namely:

- Environment and Transport;
- Health and Well-Being;
- Culture and Learning;
- Economy and Regeneration; and
- Crime and Disorder.

This approach is considered to be the most appropriate in terms of linking together the aims of the community plan and the Ipswich LDF more clearly.

SA themes, indicators and sub-indicators and trends, where possible, have been identified from the baseline data available. In addition, key issues and other relevant comments have been incorporated.

## 5.3. The SA framework, including objectives, targets and indicators

The sustainability objectives and key indicators that form the Sustainability framework listed in Table 4.3 were defined upon in the Scoping Report. The SA framework used in this appraisal is included in Appendix 1.

*Table 5.2: SA Objectives*

ET1. To improve water and air quality
ET2. To conserve soil resources and quality
ET3. To reduce waste
ET4. To reduce the effects of traffic upon the environment
ET5. To improve access to key services for all sectors of the population
ET6. To reduce contributions to climate change
ET7. To reduce vulnerability to climatic events and increasing sea levels
ET8. To conserve and enhance biodiversity
ET9. To conserve and where appropriate enhance areas and sites of historical importance
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs
HW1. To improve the health of those most in need
HW2. To improve the quality of life where people live and encourage community participation
ER1. To reduce poverty and social exclusion
ER2. To offer everybody the opportunity for rewarding and satisfying employment



ER3. To help meet the housing requirements for the whole community
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area
ER5. To revitalise town centres
ER6. To encourage efficient patterns of movement in support of economic growth
ER7. To encourage and accommodate both indigenous and inward investment
CL1. To maintain and improve access to education and skills for both young people and adults
CD1. To minimise potential opportunities for crime and anti-social activity

This framework differs slightly from that agreed by the Suffolk Sustainability Appraisal Group (of which Ipswich Borough Council is a member), in that water and air quality are not separate indicators, and that the issue of geodiversity is not included together with biodiversity. Should any further assessment be undertaken, it is recommended that these changes be made as they are important factors requiring consideration.

#### **5.4. Approach to the site specific SA**

Using indicators as outlined by Ipswich Borough Council in their SA Framework, a list of indicators and sub indicators was generated which could be scored to return the overall result for each site. This list is included in Appendix 2 as it highlights the sustainability constraints for sites. These indicators were scored using a positive, neutral or negative impact system. Once all indicators have been scored, the sum of all positives and negatives was calculated to give an overall score for each site.

This then formed the initial sustainability appraisal for each site, and comments on individual sites were added to highlight any issues regarding sustainability.

A sub total of the scores for environmental effects has been created as it is thought that these are perhaps the more significant constraints to sustainable development. These should be considered alongside the overall scores for the site.

After considering that several indicators were repeated, they were included because they form a weighting system reflective of the criteria outlined by IBC.

**SECTION C**

**CORE STRATEGY AND POLICIES**

**(INCLUDING  
DEVELOPMENT CONTROL)**

## **6. MAIN OBJECTIVES OF THE PLAN**

### **6.1. Statutory purpose**

In formal terms this Core Strategy and Policies Preferred Options Development Plan Document is intended to fulfil the requirements of the second stage of the five stage Local Development Framework production process (i.e. the Regulation 26 stage under the Town and Country Planning Act (Local Development) (England) Regulations 2004.

### **6.2. Links with national policy**

The Core Strategy and Policies DPD had to be prepared in the context of national policy documents, specifically the Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs), Government White Papers and planning circulars. It is not necessary to repeat national policy in the plan but it often needs to be interpreted in a local context or mentioned in the supporting text to assist the use of the document by potential developers.

### **6.3. Links to regional, structure or local plans**

The links to the regional spatial strategy, yet to be adopted and the Ipswich Community Strategy are described in the Preferred Options document.

### **6.4. Outline of content**

The preferred options paper produced in November 2007 sets out ten objectives related to development within the borough. These are as follows:

1. High standards of sustainable and environmentally friendly development shall be required and standards of acceptability shall be raised for all developments in the town in design and sustainability terms;
2. Every development should result in lower carbon emissions than was acceptable up to 2007;
3. At least (a) 15,400 new dwelling units shall be provided between 2001 and 2021 with at least 90% of them being on previously developed land and at least 35% of them being affordable homes; and (b) 18,000 additional jobs shall be provided in Ipswich between 2001 and 2021;
4. The development of the Borough should be focussed primarily within the central "IP-One" area and within and adjacent to identified district shopping centres;
5. Opportunities shall be provided to improve strategic facilities in Ipswich by:
  - Significantly improving the town centre in terms of the quantity and quality of the shops;
  - Ensuring a new strategic employment site is developed in the Ipswich area by 2021; and
  - Continuing to support the development of University Campus Suffolk and Suffolk New College.
6. To ensure the transport system supports people's mobility and: (i) promotes choice and better health; (ii) facilitates sustainable growth, development and regeneration; and, (iii) improves integration, accessibility and connectivity, and that specifically:
  - Significant improvements should take place to the accessibility to and between the three key nodes of: the station (including the wider Ipswich Village environment); the Waterfront (and particularly the education quarter) and; the town centre;
  - Additional east-west highway capacity is provided within the plan period in the Ipswich area to meet the needs of the wider population and to provide the potential to reallocate some central roadspace;
7. That enhanced flood protection should be in place to protect the town's existing and expanding communities from the threat of tidal flooding
8. To retain and provide high quality community facilities and accessible open spaces for people to visit and use
9. To ensure schools, health facilities and other key elements of community infrastructure are provided in locations accessible by sustainable means and in time to meet the demands put on such services from the town's growth;

10. To work with other local authorities in the Ipswich Policy Area to ensure a co-ordinated approach to planning and development.

### 6.5. Consultations carried out

Consultation on the Issues and Options for the proposed DPD was undertaken in January and February 2005. These were set out in very broad terms of content and more detail was added so further consultation could take place in June 2006 and then February 2007.

### 6.6. Compatibility of plan objectives with SA objectives

As part of the SA, it is necessary to assess the compatibility of the 10 core strategy objectives against the 22 SA objectives listed in Table 4.2. The result of this assessment can be seen in Table 5.2. Positive correlation is represented by a ✓, negative correlation with an X, uncertain correlations with ? and cases with no apparent effect on each other by a 0. Brief reasons for the scores are given.

*Table 6.1: Overall scores of the plan objectives measured against the SA objectives*

<b>Core Strategy Objectives</b>	<b>✓</b>	<b>0</b>	<b>X</b>	<b>?</b>
1. Sustainable development	18	4	0	0
2. Lower carbon emissions	8	14	0	0
3. Housing, PDL and jobs	9	8	5	0
4. Development locations	5	17	0	0
5. Strategic facilities	7	15	0	0
6. Transport	9	10	0	3
7. Flooding	5	17	0	0
8. Community facilities and open space	5	17	0	0
9. Key public services	7	15	0	0
10. Partnership working	12	10	0	0
<b>Total</b>	<b>85</b>	<b>127</b>	<b>5</b>	<b>3</b>

The appraisal of the core strategy objectives showed them to be overwhelmingly positive, with 85 positive correlations and only five negatives. A further three correlations were uncertain. All ten objectives had a positive score overall, though in only two cases (objectives 1 and 10) did positives outnumber neutrals.

All five negative correlations fell under objective 3, which dealt with the development of new housing and new employment sites. Although this level of development is prescribed by the RSS, there were concerns that it may result in an increase in traffic, which in turn may worsen air quality, an increase in waste and energy consumption, and damage to biodiversity caused by building on PDL (it is assumed PDL may have a higher biodiversity potential than greenfield agricultural monoculture).

These issues are at least partially mitigated by the all-encompassing objective 1, as it is taken that a commitment to sustainable and environmentally friendly development will aim to reduce traffic or limit its growth, reduce waste levels and increase recycling, reduce energy consumption (through low carbon or carbon-neutral developments with increased efficiency and/or use of renewable energy or CHP schemes) and avoid damage to biodiversity.

The three uncertain correlations were all on objective 6, transport. These all related to possible increases in traffic, and its effects (worsening air quality). This is because the objective voiced support for both improvements to sustainable transport and an increase in road capacity. Thus whilst boosting public transport (which would be a positive correlation), it would also increase road traffic (a negative). In turn, these cancel each other out, resulting in a stalemate.

This issue may be mitigated to some extent by more clearly stating support for improving public transport and facilities for cyclists and pedestrians, something which the existing text is not direct enough on.

*Table 6.2: Comparison of the Core Strategy objectives with the SA objectives*

	1. Sustainable development	2. Lower carbon emissions	3. Housing, PDL and jobs	4. Development locations	5. Strategic facilities	6. Transport	7. Flooding	8. Community facilities & open spaces	9. Key public services	10. Partnership working
<b>ET1. To improve water and air quality</b>	✓ Seeks environmentally friendly development		X More housing and jobs may increase traffic	✓ Aims for development around district shopping areas		? Aims to improve public transport, but also increases road capacity			✓ Aims to locate key services in sustainably accessible areas	
<b>ET2. To conserve soil resources and quality</b>	✓ Seeks high standards of sustainable development		✓ Aims for at least 90% use of PDL		✓ New strategic employment site is on PDL					
<b>ET3. To reduce waste</b>	✓ Seeks high standards of sustainable development		X New housing & development may mean more waste							
<b>ET4. To reduce the effects of traffic upon the environment</b>	✓ Seeks environmentally friendly development		X More housing and jobs may increase traffic	✓ Aims for development around district shopping areas		? Aims to improve public transport, but also increases road capacity			✓ Aims to locate key services in sustainably accessible areas	✓ Co-ordinated approach to development
<b>ET5. To improve access to key services for all sectors of the population</b>	✓ Seeks sustainable development		✓ Key services available throughout town	✓ Aims for development around district shopping areas		✓ Aims to improve accessibility				
<b>ET6. To reduce contributions to climate change</b>	✓ Seeks high standards of sustainable development	✓ Seeks to reduce carbon emissions	X More housing & employment may mean more emissions							
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	✓ Seeks high standards of sustainable development	✓ Reducing CO <sub>2</sub> emissions will help reduce sea level rise					✓ Aims to protect the town from flooding			
<b>ET8. To conserve and enhance biodiversity</b>	✓ Seeks environmentally friendly development		X Building on PDL may damage biodiversity					✓ Aims to provide open spaces		✓ Co-ordinated approach to development
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	✓ Seeks environmentally friendly development		✓ Building on PDL may help conserve areas of importance							✓ Co-ordinated approach to development
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	✓ Seeks environmentally friendly development		✓ Building on PDL may help preserve local townscape							✓ Co-ordinated approach to development
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	✓ Seeks environmentally friendly development									✓ Co-ordinated approach to development

	1. Sustainable development	2. Lower carbon emissions	3. Housing, PDL and jobs	4. Development locations	5. Strategic facilities	6. Transport	7. Flooding	8. Community facilities & open spaces	9. Key public services	10. Partnership working
<b>HW1. To improve the health of those most in need</b>	✓ Seeks environmentally friendly development					✓ Aims to promote better health		✓ Aims to provide accessible open spaces	✓ Aims to ensure that health facilities meet demands	
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	✓ Seeks environmentally friendly development					✓ Promotes choice of mobility		✓ Aims to provide accessible open spaces	✓ Aims to provide key facilities in accessible location	
<b>ER1. To reduce poverty and social exclusion</b>			✓ Aims for 18,000 new jobs		✓ Aims for a new strategic employment site	✓ Promotes choice of mobility		✓ Aims to provide quality community facilities	✓ Aims to provide key facilities in accessible location	
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	✓ Development should be sustainable	✓ Development should result in lower CO <sub>2</sub> emissions	✓ Aims for 18,000 new jobs		✓ Aims for a new strategic employment site					✓ Co-ordinated approach to development
<b>ER3. To help meet the housing requirements for the whole community</b>	✓ Development should be sustainable	✓ Development should result in lower CO <sub>2</sub> emissions	✓ Aims for 15,400 new dwellings (35% affordable)			✓ Aims to facilitate sustainable growth	✓ Flood protection will facilitate release of sites			✓ Co-ordinated approach to development
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	✓ Development should be sustainable	✓ Development should result in lower CO <sub>2</sub> emissions	✓ Aims for 18,000 new jobs		✓ Aims for a new strategic employment site	✓ Aims to facilitate sustainable growth	✓ Flood protection will facilitate release of sites			✓ Co-ordinated approach to development
<b>ER5. To revitalise town centres</b>	✓ Development should be sustainable	✓ Development should result in lower CO <sub>2</sub> emissions	✓ New residents will boost town centre	✓ Aims to revitalise town centre	✓ Aims to revitalise town centre	✓ Improves integration accessibility and connectivity	✓ Flood protection will facilitate site redevelopment			✓ Co-ordinated approach to development
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	✓ Seeks high standards of sustainable development	✓ Development should result in lower CO <sub>2</sub> emissions		✓ Aims for development around district shopping areas		? Aims to improve public transport, but also increases road capacity			✓ Aims to locate key services in sustainably accessible areas	✓ Co-ordinated approach to development
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>					✓ Aims for a new strategic employment site	✓ Aims to facilitate regeneration	✓ Flood protection will facilitate release of sites			✓ Co-ordinated approach to development
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>		✓ Development should result in lower CO <sub>2</sub> emissions			✓ Aims to support the development of UCS and Suffolk New College	✓ Aims to improve access to education quarter			✓ Aims to ensure that schools meet demands put upon them	✓ Co-ordinated approach to development
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>								✓ Aims to provide quality community facilities		



## 7. MAIN ALTERNATIVES TO THE POLICY FRAMEWORK

### 7.1. Preferred policies and options considered

The core strategy preferred options lays out 38 policies, of which 11 are related to development control. In addition to the preferred options, the document covers a number of alternative options which were considered alongside the chosen one. This section will provide a brief review of the policies and the alternatives.

#### Policy Area 1: The Approach to Sustainable Development

Considerable weight should be placed on environmental issues throughout the framework. This should reflect not just the contribution that Ipswich should make to this national and international issue but also the importance of sea level and tidal rises for a town such as Ipswich. As such there should be a strong focus on the need for new developments to be low carbon developments with a view to over the medium term reaching carbon neutral development and then checking the carbon footprint of Ipswich back to 2004 levels. Policies outlining how this would work should be included within Part D of this document. It is important that developments are designed for adaptable lifestyles and our changing environment and as such sustainable choices should be made as developments are designed and built. It is also suggested that the infrastructure needs associated with the risk of flooding are of such significance that a solution should be supported within the preferred options.

Five alternative approaches were considered:

- a. Not have any standards for a development's environmental footprint: This would still mean that developments would have to meet any standards set out within Building Regulations but would not enable the Council to set any standards nor to make it clear that such matters are of considerable importance to the Council.
- b. Require all developments to be carbon neutral: Whilst desirable in an aspirational sense it is not considered to be a viable proposition at this point in time.
- c. Require some types of development to be low carbon or carbon neutral but not others: There does not seem to be any logical basis upon which to determine what should need to meet a standard and what shouldn't and therefore this option is not thought to be a practical suggestion.
- d. Relate the carbon footprint of all developments to the overall carbon footprint of Ipswich: Whilst there is some merit in suggesting that Ipswich's carbon footprint should not exceed a set amount it is unclear how any such approach would work when dealing with individual development proposals.
- e. Have standards that relate to other issues than the carbon footprint – e.g. to eco-homes standards: Whilst there are other entirely sensible standards it is felt that the carbon footprint of a development is the best single over-arching measure of a development's environmental impact.

#### Policy Area 2: The Approach to the Location of Development

It is suggested that the appropriate approach to the location of development in Ipswich should be based around a focus on the centre and a focus on the main local / district shopping centres. This should apply to all the uses in paragraph 8.6 with the exception of industrial uses (use classes B2 and B8) which should be focussed on the town's major out of town employment areas. Open space based leisure uses should also be dispersed throughout the town. This approach would centre on the Town Centre, the Village and the Waterfront. These areas would be expected to receive the highest densities of development in the town – including high density housing developments. Medium density and locally focussed facilities would then be provided within and around district centres. Further information about how this might be enshrined in policy is contained within Policy Area 9 below.

This approach would also effectively set out the town's retail hierarchy (i.e. town centre, district centres, other centres) In the context of the relevant district centres it is suggested that this should include the following 12 centres:

- Meredith Road;
- Norwich Road / Bramford Road;
- Sproughton Road / East way (to be developed);
- Hawthorn Drive;
- Stoke Park;
- Wherstead Road;
- Duke Street (to be developed);
- Cauldwell Hall Road / Woodbridge Road;
- Felixstowe Road;
- Nacton Road
- Ravenswood;
- Woodbridge Road / Heath Road.

If a northern fringe development takes place it should also contain a district centre that would join the above list. It is suggested that zones be drawn around these centres of 400m straightline distance within which the Council would support the provision of identified key facilities. A wider zone of 800m should also be drawn within which the Council would support in principle medium density housing provision to try to increase the proportion of people living near to key facilities. Appendix 3 along with a list of possible key facilities. It should be noted that many of the centres above already have many of the facilities mentioned within 400m of their centres. Zonal maps of the above centres should be included in the IP-One Area Action Plan and the Site Allocations and Policies documents.

Three alternative approaches have been considered:

- a. Concentration of all development in the centre of Ipswich: This would arguably be supported by a very strict interpretation of the sequential test but realistically it would leave the vast majority of the town without an adequate framework for the provision and location of locally based services. It would not result in any recognition of the important role that local services can play in community cohesion and influencing travel patterns;
- b. Dispersing development all over Ipswich: Whilst arguably this option would also spread and disperse the impacts of development it would be contrary to national and regional policy that seeks to focus development in central locations. At a local level it could result in a serious detrimental impact on the vitality of the centre of the town and provide fewer opportunities for 'joined-up' trips and any elements that might seek to reduce the need to travel;
- c. Following the same general approach as put forward within this paper but identifying different centres, different key local facilities or different uses to focus in the centre of the town: The selection of uses appropriate to the centre of town and to the town's employment areas reflect national policy as set out in PPS6. In the context of the district centres suggested it may be possible to justify an alternative list although it is not an approach that would work with all 40+ local shopping centres in the town.

### Policy Area 3: The Approach to Mixed Use Development

It is suggested that there is a strong link between this Policy Area and Policy Area 3 (location of development) and that in practice this means that:

- Major developments in the central area should include a mix of uses;
- Major developments within the district centres highlighted in policy area 2 should include a mix of uses;
- That a mix will not be required for other developments unless the specific circumstances of the site (by virtue of their scale or location) suggest that a mix should be required.

In terms of defining 'major' in relation to this approach it is suggested that this refers to commercial developments of 1000m<sup>2</sup> or more or residential developments of 10 units or more. Where a mix is required it is considered important that there is some flexibility and also that the Council does not come up with too complicated a policy approach. It is therefore suggested that for every site allocation, and in dealing with major applications that do not relate to site allocations that the following approach is used:

That sites are allocated for:

- (a) 100% of a single use;
- (b) Up to 80% of a single use and flexibility, subject to other policy requirements, for the other 20%;
- (c) Around 50% of a single use and either a specified other use for the other 50% or flexibility, subject to other policy requirements, for the other 50%;

Two main alternative approaches have been considered:

- a. To not have a mixed use policy and assume mixes would be proposed: A policy basis is considered important as without one there would be a strong probability that single use developments would be the norm and that the Council would find it even more difficult to achieve sustainable communities;
- b. To treat each site separately and potentially have a different mix for every site: Whilst in some ways this might be the ideal approach it would result in an incredibly complex system to produce and probably understand.

#### Policy Area 4: The Approach to Protecting our Assets

Dealing firstly with the historic environment, listed buildings are well protected by national legislation and guidance. Since they are all listed on their individual merits, it is not considered necessary or possible to have a general local policy or strategy applicable to them as any such policy would not add anything to the national protection they receive. Conservation areas are slightly different since they do have their own wider area character and it is therefore possible to construct some policy approaches applicable to them. It is suggested that this be done via Conservation Area Character Appraisals for each of the fourteen areas (and any subsequent ones that are confirmed). Major change is not expected or proposed within the rest of the Local Development Framework for 12 of the 14 so it is suggested that those Appraisals should be given weight as a material consideration via appropriate text within the Core Strategy document. Many of them have now been produced and community engagement and consultation with land and property owners is a key part of the production process.

For two Conservation Areas, the Wet Dock and the Central Conservation Area, major change is anticipated and indeed advocated. Therefore, it is proposed to produce the two appraisals for those areas alongside the production of the IP-One Area Action Plan. The Council will consider whether it they would be best incorporated within the appendices to that document or produced as Supplementary Planning Documents. In terms of the natural environment, the Council recognises the importance of following the guidelines set out in PPS9, and that development in the vicinity of areas with nature/ wildlife designations must take into account the wider effects on those sites. This coupled with other statutory requirements associated with the designation of sites suggests that there is no specific need for an additional policy basis within the Core Strategy since any such policy would duplicate existing national policy or legislation. However, it is considered that a basic protection policy should be set out within Part C of this document.

Three alternative approaches were considered:

- a. Including Lots of Protection Policies: These would have to have been fairly general and replicate national policy and as such would have been contrary to one of the core elements of the new Framework – i.e. to be distinctive to Ipswich. However there is considered to be some merit in addressing this issue within Part C of this document;
- b. Including All Conservation Area Character Appraisals: This would significantly increase the length of relevant Framework documents and increase the length of time it takes to produce the Appraisals. From experience of producing them they are not generally controversial and do not need the potential added weight a formal position within the Framework would give them. Over-time a review will be carried out as to whether it would be sensible to produce and adopt them formally as Supplementary Planning Documents;
- c. Including None of the Conservation Area Character Appraisals: This would be an acceptable solution if there was not major or controversial change proposed in or around any of the towns conservation areas. However there is major change proposed and therefore it is thought

appropriate that the two relevant Appraisals be fully integrated to enable maximum community engagement and to ensure maximum weight can be given to the end product.

#### Policy Area 5: Urban Design

It is recognised that urban design features in the Core Strategy objectives (see Chapter 7) and that that can be built upon within Part C of this document and the IP-One Area Action Plan. It is not considered necessary or appropriate to produce an over-arching Core Strategy policy on this issue.

Two alternative approaches were considered:

- a. Including Urban Design policies: These would have to be fairly general and replicate national policy and as such would have been contrary to one of the core elements of the new Framework – i.e. to be distinctive to Ipswich;
- b. Not including Urban Design at all within the Core Strategy: This would imply that the issue is not of significance to the Council and since it is important this possible approach has not been pursued.

#### Policy Area 6: The Ipswich Policy Area

It is suggested that within the final Core Strategy document, Ipswich Borough Council should recognise the importance of joint working on development issues around the fringes of Ipswich. However it is particularly important at this point in time that Ipswich Borough focuses on its area and its local development documents rather than try to alter course to produce joint documents. To undertake joint documents would require the agreement of the neighbouring authorities which cannot be guaranteed and would inevitably significantly delay the process. It is possible that there will be some issues where it might be appropriate to produce joint documents (e.g. in examining issues associated with the fringes of the town). This should be investigated further and, if supported, implemented as part of any forthcoming Regional Plan / Local Development Framework review – i.e. the next time around and not this time.

In the meantime the Borough Council will have the opportunity to comment on key strategic planning applications in neighbouring authorities as well as work on their respective Local Development Frameworks. Neighbouring authorities, including parish councils, will have the opportunity to comment at all stages of the production of the Ipswich Local Development Framework. As a starting point the Borough Council has recently been instrumental in setting up an Ipswich Policy Area Board involving councillors from the Borough Council, the neighbouring authorities and the County Council to focus on and discuss development issues. More details on this are provided within Chapter 11.

Three alternative approaches have been considered:

- a. Commit to undertaking joint local development documents now: Firstly this would involve suspending all work underway on the Framework and may necessitate work starting again and secondly no other Suffolk authority has taken this course of action or suggested they wish to follow that course of action.
- b. Delay everything and wait for the Regional Plan to be adopted in the hope that that would clarify whether joint documents should or must be produced: This would result in at least a six month delay and quite probably wouldn't make the decision any easier / different at the end of the day. It is thought unlikely that the final Regional Plan will state that joint documents must be produced immediately.
- c. Decide that the Council is opposed to the notion of ever producing joint local development documents: It is clearly the case that Ipswich has an interest in development issues outside its boundaries (and vice versa). It may be the case that there might be merit in the future to producing joint documents – it is thought to be too early to rule out that option completely.

#### Policy Area 7: The Amount of Housing Required

The table below sets out a suggested approach:

*Table 7.1: Suggested approach to housing requirements*

	Number	Discounted no.	Cumulative no.
Units completed between 2001 and 2007 <sup>1</sup>	3,868	-	3,868
Units under construction <sup>2</sup>	1,109	-	4,977
Units with planning permission <sup>3</sup>	3,585	3,406	8,383
Units with a resolution to grant planning permission (subject to prior completion of a section 106 agreement) <sup>4</sup>	720	666	9,049
Predicted re-use of vacant residential units (2007-2021) <sup>5</sup>	250	-	9,299
Number of units need on new site allocations <sup>6</sup>	6,101	-	15,400

<sup>1</sup> Actual numbers for 2001 to 2007

<sup>2</sup> Units under construction at 31st March 2007 – assumed that all will be completed;

<sup>3</sup> Other units with planning permission at 31st March 2007 – assumed that 5% of these will not be completed

<sup>4</sup> Units with a resolution to grant planning permission from the Council's Planning and Development Committee but which are awaiting completion of a section 106 Agreement before planning permission is issues – assumed that 7.5% of these will not be completed

<sup>5</sup> An allowance is made for the re-use of vacant properties. This allowance would bring Ipswich into line with the national average at 2001.

<sup>6</sup> To reach the regional target of 15,400 units by 2021 further land will need to be allocated for housing.

This means that just over 11,500 units need to be provided between 2007 and 2021. If it is assumed that 10% of predictions within land use allocations will not actually be built within the plan period, it is suggested that the Council should allocate land for 6,779 units. The allocation of the sites would be done within the Site Allocations and Policies and IP-One Area Action Plan documents, having regard to the Strategy set out within this document. The above data coincides with the need to allocate for a 10 year period after the adoption of relevant development plan documents (see paragraph 8.134 and 8.135 of the Core Strategy). It should be noted that this table will change within the submission version of the Core Strategy as it will be updated to include what happens during the 2007 / 2008 financial year.

Two alternative approaches have been considered:

- a. Different assumptions about non-delivery of dwelling units: Alternatives around making no discount for non-delivery, or different percentage discounts have been considered. However, it needs to be recognised that not every dwelling unit predicted will get built by 2021 and that the likelihood of the units being built will vary depending on the stage of the planning process that has been reached. The percentages used are largely based on past experiences.
- b. Different assumptions about the amount of vacant units to be re-occupied: It is inevitable that at any given moment some of the housing stock in any local authority area will be vacant. Units may be vacant long-term or they may be vacant for a limited period between occupiers. At 2001 Ipswich had a slightly higher proportion of vacant units than the England, East of England, Suffolk and Regional Cities East average. The figure given in the above table is considered to be a realistic target and reflects the England and the Suffolk average – it is not thought sensible to set a substantially higher figure as there would be serious concerns as to how deliverable that would be.

#### Policy Area 8: The Balance between Flats and Houses

It is suggested that a balance of types of properties are needed - housing and flats and that there needs to be delivery of both forms across the plan period rather than a significant majority of one type at one time. Thought will need to be given as to how to achieve this via the planning system – this is in part addressed by Policy Area 2. In terms of the proportion of houses to flats it is recognised that the market has a key role to play in this issue and that that the market view may change over time. It is also noted that the majority of the main residential sites outside the Borough but within the Ipswich Policy Area are proposed for housing rather than flats. It is suggested that central sites should be high density developments (probably mainly flats), sites in or close to district shopping centres be medium density developments (probably a mix of flats and houses)

and sites elsewhere be for low density developments (probably mainly housing). It is important to strike an appropriate balance between providing freedom and flexibility for the housing market to operate and ensuring that a range of sites are available for different areas of the housing market.

In the context of that framework and the suggestion that some control should be exercised over the delivery of houses or flats via the planning process it is also suggested that there should be a presumption in favour, subject to complying with the Policies that will be in Chapter 8 and Part D of this document, of developments that fall within their allocated density band. There should be a presumption against developments that fall outside their allocated band – be they above or below the allocated band - unless satisfactory evidence is provided to the Council with the relevant application that relates to the following three issues:

- Site location and design factors that would justify a different approach;
- A development specific housing market assessment demonstrating that the proposal positively meets an identified need in the local housing market;
- Commitment on behalf of the applicant to commence the development within a short-time period, say 2 years, and complete it to an agreed programme.

A variety of other approaches have been considered. However these broadly fit into two categories:

- a. To set a target for flats / houses: The Council is not in a position to control what actually gets built it is important that it guides development where possible – i.e. through the determination of planning applications. The approaches within the Strategy will assist with the allocation of sites in different areas of the town and result in the allocation of sites that are suitable for housing rather than flats. It is also recognised that: (i) Ipswich historically has a low level of flats; (ii), that national policy suggests that the Council should be encouraging higher density development such as flats; (iii) that the trends are towards smaller household units; (iv) that the development pipeline as approved contains around 75% flats; and (v) developments elsewhere in the Ipswich Policy Area tend to be houses rather than flats;
- b. To offer no flexibility for proposals that might be outside their 'normal' density band: Whilst it is appropriate to have a standard and to use it to assist with development control decisions some flexibility is important to take account of individual circumstances related to the site, the proposal or the time. The approach suggested will provide this flexibility in cases where flexibility can be warranted.

#### Policy Area 9: The Density of Residential Development

It is suggested that three density bands are used within Ipswich as follows:

- High Density Sites: Above 110 units per hectare (at an average of 165 units per hectare);
- Medium Density Sites: Between 40 and 110 units per hectare (at an average of 55 units per hectare);
- Low Density Sites: Between 30 and 40 units per hectare (at an average of 35 units per hectare)

In practical terms it would then be expected that relevant developments are within the ranges shown (or above it in the case of high density sites) and that for the calculation of expected residential numbers per site the average figures be used. This standard is based on what has actually been achieved or approved in Ipswich since 2001. A separate paper entitled: Supporting Paper on Housing Density in Ipswich explaining how these figures have been produced is available from the Council.

Two other approaches have been considered:

- (a) To utilise the relevant national density standards set out within PPS3: It is considered that the figures derived from experience in Ipswich are of greater relevance to the town than national figures which are inevitably an average of what is suitable to different types of places; and
- (b) To use a different point in the range than the average of development densities (e.g. the mid point): It is considered that the average represents a more realistic level to use for other developments than the mid-point in the range.



#### Policy Area 10: Previously Developed Land Target

Past development history in Ipswich indicates that a target well in excess of the national 60% is achievable. It is suggested that the target for the full 20 year plan period should be for 90% of all new housing to be developed on previously developed land. This will encourage the early delivery of previously developed land rather than greenfield land.

*Table 7.2: Previously developed land target*

	2001-2006 (Actual)	2006-2011 (Predicted)	2001-2016 (Predicted)	2016-2021 (Predicted)	2001-2021 (Predicted)
PDL (at least)	89%	90%	90%	90%	90%
Greenfield (up to)	11%	10%	10%	10%	10%

Two main alternative approaches were considered:

- To have a different target over the 20 year period: The above target would limit the amount of greenfield development and make it particularly difficult to justify greenfield development apart from those developments already approved or allowed for within the IP-One and Site Allocations documents. A higher target could only realistically be justified by concluding that no further greenfield developments would be permitted; and
- To differentiate between different phases of the 20 years: The principle of having five year housing phases is supported by national and regional policy. This can be used to prioritise previously developed land, but having regard to the small levels put forward and the conclusions on the major greenfield issue set out below, there is not thought to be any benefit in differentiating within different five year bands.

#### Policy Area 11: Greenfield Land

It is suggested that there is no need to allocate greenfield land at north Ipswich within the Local Development Framework for the period to 2021. North Ipswich is the only substantial element of greenfield land within the Borough boundary where it might be appropriate to locate development. However it is necessary to identify part of the northern fringe area as a possible broad location for future growth for the period after 2021. In principle it is considered that parts of the northern fringe could be suitable for residential led development in appropriate circumstances. This would include some or all of the elements between Henley Road and Tuddenham Road (sites B, C and / or D as identified in the 2006 Issues and Options Consultation). These are illustrated on the Key Diagram (see Chapter 9 of the Preferred Options paper). In practical terms there are no other areas within the Borough boundary that the Council could realistically identify as having the potential as a broad location of future growth for the full 15 year period. This does not mean that the land is formally allocated for development. The detailed merits of doing that would need to be considered via the next version of the Regional Spatial Strategy, which will provide a housing target for Ipswich up to around 2031, and the next versions of the Core Strategy and other development plan documents.

Three main alternative approaches were considered:

- To allocate a large site for up to 1500 units in the period before 2021: It is not considered that it is necessary to allocate land at the northern fringe to meet the housing target set out within Policy Area 7. The justification above (paragraph 8.223) also explains that it is considered that the northern fringe should be planned as a whole not in parts – although this should not be read to mean that the Council agrees that it has to be developed at all (or for any given number) over the longer term. Equally the Council does not believe a small greenfield release of a few dozen or hundred would be justified as it would not have the scale necessary to create a sustainable development with an appropriate range of facilities.
- To formally allocate land for housing with a time-frame looking beyond 2021 – i.e. to cover the full 15 year period referred to in Policy Area 7: The current draft Regional Strategy sets very high and challenging housing targets for Ipswich that are far higher (i.e. nearly double) targets contained in previous documents. It does not automatically follow that it would be sustainable (in demographic and economic terms as much as in land availability terms) to continue those levels in the longer term. Nor is it automatically the case that they should be within the Borough

boundary rather than in the wider Ipswich area. Not formally allocating any land at the northern fringe would be consistent with the objective (as reflected in Policy Area 10) of maximising the delivery of housing on previously developed land. The planned date of the next Regional Spatial Strategy and the likely parallel preparation of the next version of this document mean that there would be plenty of time to plan for a northern fringe development, if and when appropriate, and still ensure it could be delivered within the timeframe that might be necessary.

It should also be noted that the Council is proposing via Policy Area 7 to over-allocate by assuming some planned housing will not take place by 2021 and that no allowance has been made for any form of windfall allowance (be it small sites of less than 10 units or large sites which come forward outside the plan process). Finally, it is recognised that there will be a realistic limit to the amount of housing that can be delivered in any year of a four or five year period (i.e. 2021 to 2025 or 2026) within any development – be it at the northern fringe or elsewhere. But having regard to all the issues set out above it is not considered that this factor justifies an allocation at the northern fringe at this stage. It may however mean that if northern fringe development does take place following a future round of planning document production that it may need to commence a year or two before 2021 and continue throughout much of the 2020s decade. In any event, it remains possible that the Site Allocations and IP-One document will actually allocate more land than the 6,779 needed when the detailed assessment of land availability are completed and incorporated within final versions of those documents – i.e. those documents might actually meet part of the need to 2025 or 2026 by identifying previously developed land for that period.

- c. To not identify land to cover the period after 2021: PPS3 is clear that this issue should be addressed by Councils within their local development documents. To not do so would put the Council's documents at significant risk of being found 'unsound' when they are independently examined by the Planning Inspectorate. This would probably mean the Council would not be able to adopt the document and would have to start production work again. Having considered the potential consequences of this, this is not a risk the Council is prepared to take.

#### Policy Area 12: Gypsy and Traveller Accommodation

The need for permanent pitches as demonstrated by the most recent and most localised assessment demonstrates that there is a very small need for additional permanent pitches. The Council believes this issue should be addressed on an Ipswich Policy Area basis. The allocation of such a small site (i.e. for 1 to 3 pitches) is not practical since that would be of a site size well below the size of any other site that will be allocated within the Framework. It is also questionable whether that size site is the most efficient from a management perspective. The Council could also consider whether some redesign of the existing West Meadows site could meet such a comparatively small need. The issue of the transit pitches is more significant numerically. The June 2007 report advocates a trial transit site within the Policy Area but this transit site issue has not been addressed within the regional consultation. Therefore it is not suggested there is an evidence base that justifies the provision of a site at this stage.

It is also recognised that the adoption time-frames for this document and the other documents (i.e. 2009 to 2011) will be after any site planning would need to be undertaken to actually meet the statistical needs which are largely identified as being up to 2011. Finally, it is considered that this issue would be better addressed via a review of the Core Strategy following the adoption of the Regional Spatial Strategy that covers this issue. However in principle the Council should support proposals for permanent or transit sites should any applications be made within the boundary, providing they meet other relevant planning policies.

Two main alternative approaches were considered:

- a. To propose the allocation of sites (either permanent or transit): The need for permanent sites within Ipswich Borough is not thought to be sufficient to necessitate the allocation of an actual site. In terms of transit sites this issue is currently outside the scope of the regional strategy work and at a more local level it is suggested that it is addressed at the Ipswich Policy Area level.

- b. To oppose any form of provision within the Ipswich Policy Area: The evidence suggests there is a need in the area and therefore it is not suggested that there is a rationale for doing nothing or not supporting the principle of new provision.

#### Policy Area 13: The Development of a Residential Planning Gain Tariff Approach

It is suggested that the Council should support a tariff based approach based around the following guidelines:

- Each development to resolve any factors specifically relevant to the site outside the tariff approach (e.g. contaminated land and access issues);
- All items of planning gain associated with development (see the list below) should be the subject to the tariff approach as shown in the table below;
- This excludes affordable housing which is dealt within Policy Area 14 and open space which is dealt with within Policy Area 22;
- For very large developments some on-site provision may be required to ensure local availability of services / facilities (and this may have an impact on the tariff level for those developments) – e.g. health centres, schools, communities buildings and sports facilities. The IP-One and Site Allocation documents would need to identify which sites this would apply to;
- There is flexibility within the open space provision (see Policy Area 22) for the Borough to locate play areas on site if that is the best way of meeting local needs and for the costs of them to be met from the tariff rather than from the development in question; and
- It is suggested that the tariff should apply to every residential unit. Whether or not the approach should apply to other uses is considered in Policy Area 19.

In the context of the tariff it is proposed that an indication is given that the Council believes income from it should be allocated to:

- Transport = 17.5%
- Education = 10%
- Health = 10%
- Environment = 7.5%
- Culture = 7.5%
- Sport and Recreation = 7.5%
- Community = 5%
- Emergency Services = 5%
- Conservation = 2.5%
- Economic Development = 2.5%

In addition it is suggested that 25% of the tariff receipts will be pooled centrally to aid with delivery, as early as possible, of major capital projects associated with growth. These are set out within Part D of this document. It is anticipated that the submission Local Development Framework documents will identify specific projects for all ten areas outlined above. Appendix 4 provides further clarity as to the activities or services that would or could be relevant under each of the above headings. All monies would need to be spent on capital projects although this could probably include revenue costs associated with scheme development and start up costs. It is also likely that this money would be used as match funding to help secure funding from other external sources and maximise the amount that can be delivered via the planning tariff. This should be monitored and reported on within each Annual Monitoring Report. At this stage it suggested that a tariff level is not actually put forward but:

- The means of calculating the charge would need to be within the submission Core Strategy;
- Having regard to comparators elsewhere it is unlikely to exceed £20,000 per unit;
- Work would need to be undertaken to work out what the tariff should be.
- Any such work would need to consider the issue of the timing of tariff payment(s).

The Council anticipates commissioning this work early in 2008. It also recognised by the Council that it is unlikely that it will be possible to require developers to go down the tariff route until after a policy is finally adopted. Therefore in the intervening period the Council will continue to rely on the

current system. However, developers may choose to opt for the tariff system in relation to individual schemes in advance of any adoption of a tariff system. It should be noted that, if a tariff approach is adopted, then the Council would look to use it for all relevant planning applications determined after the date of the policy's adoption. The Council will also have regard to how these issues are addressed outside the Borough and it is acknowledged that the Council may choose to use some of the tariff money collected via developments in Ipswich to contribute towards projects outside the boundary (e.g. on transport projects).

Three main alternative approaches were considered:

- a. To continue with the topic by topic and site by site planning gain system: Whilst such a system can and does work it is very complex and tends not to provide certainty as to what is needed or flexibility as to where, when and how it can be provided. It would also be more difficult to fund big infrastructure projects. In addition the national moves in this area, led by government, tend to be towards a more standardised approach as set out above;
- b. To have a very precise system linking a tariff to specific projects: This approach would have merit but would provide very little flexibility. It is not considered that it would be practically possible to set out such a system down to every last item. Some key projects are set out within Part D.
- c. To just have a tariff with complete discretion as to where it would be spent: Whilst this would provide considerable discretion for the Council it would also not provide any framework to guide the Council in terms of spending the money. More significantly it would not demonstrate the important linkage between the development, its tariff and linking the tariff to needs arising from growth.

#### Policy Area 14: Affordable Housing

It is recognised that these issues inter-relate with other planning gain issues and having considered all these issues the Council suggests that its approach should be that:

- At least 40% affordable housing to be provided on each site on or above the main national 15 unit threshold;
- Sites of between 10 and 14 units should be required to provide 25% of their units as affordable;
- Smaller sites of between 5 and 9 units should be required to provide 20% of their units as affordable.
- That at least 65% of units on the larger sites (i.e. on or above 15 units) must be rented.

Other more detailed affordable housing policies should be set out in Part C of the Preferred Options paper.

Three main alternative approaches were considered:

- a. A different approach to the main affordable housing proportion (i.e. 40%): This level will ensure that the Council meets the Regional Strategy aspiration and also reflects the high affordable need levels in Ipswich. It is balanced by the need to effectively prioritise affordable housing against the other planning gain items set out within Policy Area 13.
- b. A different approach to affordable housing on smaller sites of less than 15 units: In recognition of the high levels of affordable housing need in Ipswich it is considered that it is appropriate to seek the provision of affordable housing on sites smaller than 15 units. The proposal put forward would do that whilst providing suitable flexibility for developers of small sites.
- c. A different approach to the main rented proportion (i.e. 65%): At least 65% rented is the current policy basis in Ipswich. It is considered to be appropriate in balancing recognised needs with prioritisation, funding and delivery issues.

#### Policy Area 15: The Number of Jobs to be Planned For

It is suggested that Ipswich plan for a net addition of 18,000 jobs between 2001 and 2021.

- a. To have a different target: The only work undertaken to date to split this target would suggest that the 18,000 figure proposed above is an appropriate one and therefore there is no real basis for the figure being anything else;
- b. To not have a target at all: It is important that the Core Strategy is in general conformity with the Regional Spatial Strategy which contains a three authority target. In addition the target enables the Council to plan for employment provision and to also provide a basis for addressing the issue of balancing the need for housing and the need for jobs and to consider this factor when determining which uses are appropriate on each site.

#### Policy Area 16: The Implications for Different Employment Sectors

It is suggested that an indication be given of the net job change that the Council should be working towards for the period 2001 to 2021. This will include some job sectors where a reduction might be expected, others where no or limited growth is expected and some where substantial growth is expected. Table 7.3 is taken from the Employment Land Study for the Haven Gateway (December 2005). Site allocations will need to be made having regard to the table's contents.

*Table 7.3: Jobs change in Haven Gateway between 2001 and 2021*

<b>Industry sector</b>	<b>Net change</b>
Agriculture	-100
Manufacturing	-1,500
Electricity, gas and water	-100
Construction	0
Distribution	600
Retail	2,200
Hotels and catering	200
Transport and communications	2,500
Baking, finance and insurance	800
Other business services	7,900
Public administration and defence	-500
Health and education	3,300
Other services	2,500
<b>Total</b>	<b>17,800</b>

Three other approaches have been considered:

- a. Not breaking down the target at all: It is recognised that there will need to be some flexibility around the above table and that realistically the market will drive the outcome. However, having a notional guide within a policy will assist with the development of the rest of the Local Development Framework. Without doing so would make the development of the Framework particularly difficult;
- b. Having a more detailed breakdown than the 13 areas identified in Table 7.3: It is important to recognise that this table will be unlikely to act as much more than a notional guide and that flexibility is important. In that context it is thought that there are enough groupings and that they are widely recognised titles within the economic development sector;
- c. That the breakdown between the 13 areas should be different: It is considered important that experts in the field, utilising an appropriate statistical and evidence based approach, have worked this up – rather than the Council using guesswork or other less evidence based routes.

#### Policy Area 17: The Approach to Strategic Employment Sites

The Regional Spatial Strategy does not require that there is a strategic site within the Borough boundary – just that there is (at least) one in the Ipswich area. There are a number of sites outside the Borough boundary that could fulfil this requirement – some greenfield and some on previously developed land. However the Council considers it important that if there is an appropriate site in Ipswich that it should be identified within the Local Development Framework as a 'strategic employment site' to ensure that the Regional Spatial Strategy is complied with as well as helping with the jobs target referred to in Policy Areas 15 and 16.

It is considered that there is only one possible area within the boundary that meets the requirements of such a site – i.e. a very large site that is likely to be available within a reasonable time-frame and that is well connected to the transport network (both roads and public transport). This is the Cranes site on Nacton Road in the south east area of the town. This should be set out in more detail within the Site Allocations and Policies document.

Three other approaches have been considered:

- a. Not to allocate a site: The Council could conclude that any site(s) would or should be in a neighbouring district. However, as there is a site that meets the basic requirements within the Borough and as there can be no guarantee about sites outside the Borough it is considered that the site should be allocated;
- b. To allocate a different site: It is not considered that there are any other appropriate sites within the Borough boundary;
- c. To not be site or area specific within this document but to leave the allocation to other development plan documents: This is considered to be an issue of strategic importance that should be addressed within this Core Strategy document and as there is only considered to be one suitable site then it is particularly appropriate to identify it in principle here whilst identifying a need for further detailed comment within the Site Allocations and Policies document.

#### Policy Area 18: The Approach to Retail Development

As set out in Chapter 7 of the Preferred Options paper, improving the retail offer in Ipswich is an important objective especially in terms of the quality of the retail offer available. It is recognised that this needs to be done in as sustainable a manner as possible having regard to transport issues and the importance of increasing the vitality and viability of the central area and key district centres (see Policy Area 2). It is suggested that the Council maintains its long held position that there is not a justification for further major out-of-town retailing as that would detrimentally impact on the existing town centre and local shopping centres as well as reduce the chances of substantial investment in the central area. In reaching this view it is recognised that there are suitable sites within the centre of Ipswich for major retail investments. An increase in the retail offer of key district centres is likely to be supported provided the retail offer is of a scale relevant to the catchment of that centre rather than the town as whole. Issues associated with the uses permitted within centres are addressed within Part C of the Preferred Options document.

Two other approaches have been considered:

- a. To support further out-of-town retailing but to leave site selection to other documents: Having regard to the national and regional policy position and the finding of the Ipswich Retail study it is not thought that there is any justification for general support of further out-of-town centres;
- b. To identify specific sites for out-of-town retail development: It is possible that a specific case could be made that merits the inclusion of a specific site due to its own characteristics. However, having regard to the evidence on retailing and transport matters it is not thought that there is a site specific case that would merit an allocation.

#### Policy Area 19: The Approach to a Non-Residential Planning Gain Tariff

It is considered that there is some merit in utilising a planning gain tariff approach for non-residential uses. However it needs to be recognised that non-residential uses do not impact in the same way as residential uses on the same range of possible planning gain items. It is suggested that the Council should support a tariff based approach that builds on that set out in Policy Area 13, i.e.

- Each development to resolve any factors specifically relevant to the site outside the tariff approach (e.g. contaminated land and access issues);
- That all items of planning gain associated with development (see the list below) should be the subject to the tariff approach as shown in the table below;
- It is suggested that the tariff should apply to all non-residential uses with the exception of non-profit making community uses;
- It would apply as a set amount for every 100m<sup>2</sup> of gross internal floorspace (see list below).



In the context of the tariff it is proposed that an indication is given that the Council believes that tariff should be split as follows:

- Transport = 50%
- Environment = 25%

In addition it is suggested that 25% of the tariff receipts will be pooled centrally to aid with delivery, as early as possible, of major capital projects associated with growth. These are set out within Part D of this document. It is anticipated that the submission Local Development Framework documents will identify specific projects for both areas outlined above. Appendix 4 of the Preferred Options document provides further clarity as to the activities or services that would or could be relevant under each of the above headings. All monies would need to be spent on capital projects although this could probably include revenue costs associated with scheme development and start up costs. It is also likely that this money would be used as match funding to help secure funding from other external sources and maximise the amount that can be delivered via the planning tariff. This should be monitored and reported on within each Annual Monitoring Report,

At this stage it suggested that a tariff level is not actually put forward but:

- The basis for its calculation would be set out within the submission Core Strategy;
- It is unlikely to exceed 25% of the residential amount per unit;
- Work would need to be undertaken to work out what the tariff should be.
- Any such work would also need to consider the issue of the timing of tariff payment(s).

The Council anticipates commissioning this work early in 2008. It also recognised by the Council that it is unlikely that it will be possible to require developers to go down the tariff route until after a policy is finally adopted. Therefore in the intervening period the Council will continue to rely on the current system. However, developers may choose to opt for the tariff system in relation to individual schemes in advance of any adoption of a tariff system. It should be noted that, if a tariff approach is adopted, then the Council would look to use it for all relevant planning applications determined after the date of the policy's adoption. The Council will also have regard to how these issues are addressed outside the Borough and it is acknowledged that the Council may choose to use some of the tariff money collected via developments in Ipswich to contribute towards projects outside the boundary (e.g. on transport projects).

Four other approaches have been considered:

- a. To continue with the topic by topic and site by site planning gain system: Whilst such a system can and does work it is very complex and tends not to provide certainty as to what is needed or flexibility as to where, when and how it can be provided. In addition the national moves, in this area led by government tend to be towards a more standardised approach as set out above;
- b. To have a very precise system linking a tariff to specific projects: This approach would have merit but would provide very little flexibility. It is not considered that it would be practically possible to set out such a system down to every last item. Some key projects are set out within Part D;
- c. To just have a tariff with complete discretion as to where it would be spent: Whilst this would provide considerable discretion for the Council it would also not provide any framework to guide the Council in terms of spending the money. More significantly it would not demonstrate the important linkage between the development, its tariff and linking the tariff to growth need;
- d. To not have a tariff system for non-residential uses: It should be noted that the advocates to include non-residential uses within any such approach were the Government Office and on reflection the Council believes it is appropriate to recognise that such uses do impact on and benefit from infrastructure matters and therefore should be subject to a limited tariff system.

#### Policy Area 20: The Approach to Education Provision

The developments at Suffolk New College and University Campus Suffolk are hugely exciting and vitally important to the future well-being and prosperity of the town. The Council has been fully supportive of these initiatives and it is important that this support continues and is set out within the Core Strategy document. Both developments are focused within Ipswich Waterfront and the IP-

One Area Action Plan will need to ensure they are supported and key land elements protected for education led use. The proposal for a new 14 – 19 centre that would provide enhanced facilities and opportunities for people in the western half of the town is supported by the Council although the likely site is outside the Borough boundary. This should significantly improve opportunities in this area and complement the existing strengths within secondary schools in the eastern half of the town. As a consequence the 14-19 centre would take some of the pressures of secondary school accommodation issues. It is not considered that a new secondary school site is required within the Borough boundary although if a northern fringe development were to take place (see Policy Area 11) in the future it is possible that a new secondary school may be needed as part of it due to the scale of development and the capacity in the nearby schools.

The Council is supportive of the core principle of the government's Building Schools for the Future initiative – i.e. to substantially upgrade education facilities – and recognises that there is a need for substantial regeneration within existing sites. At primary level whilst local issues are set out within the IP-One and Site Allocations documents, the specific growth related development pressures are considered to necessitate a new primary school on the east side of the Waterfront. This should be facilitated within the IP-One document and is included within the list of strategic projects in Part D. At pre-school level the Council recognises the importance of nursery and children's centre provision and the importance of these being located in sustainable location. As such these uses should be encouraged within or adjacent to the district centres listed in Policy Area 2.

Two other approaches were considered:

- a. Not to include anything on education within the Core Strategy: Whilst there may not be a huge focus on education with the submission Core Strategy it is nonetheless considered a key issue that needs to be included;
- b. To actively propose a new secondary school in the northern fringe: Whilst there is some merit to the suggestion of a new secondary school at north Ipswich there is not considered to be a justification for this in isolation from a northern fringe housing development. In any event without the related housing development the chances of obtaining the land and delivering a school are very slim.

#### Policy Area 21: The Approach to Green Corridors

It is suggested that the Council's approach to green corridors should be continued and that the Site Allocations and Policies Documents identify the corridors and policies relevant to them. In addition it is proposed that this 'spoke' base approach should be extended to create and protect a range of publicly accessible greenspaces on the edge of the town with a view to creating a 'rim' of spaces around the town. It is suggested that this approach should be promoted to neighbouring local authorities as realistically parts of any such network will be outside the Borough boundary. The corridors should ideally join up with this rim of spaces. The Site Allocations document should set out some key policies and sites relevant to this approach.

Two other approaches were considered:

- a. Not to have a green corridor policy: Since it is considered that the existing green corridor policy has been reasonably successful but needs longer to fully succeed it is logical to include such an approach with this document;
- b. Not to have a green rim approach: Whilst this is effectively a new policy approach it builds on the rationale of the existing green corridor approach and should link the fringes of the town together better – it should also increase the protection that can be given to key sites and routes around the edge of the town.

#### Policy Area 22: The Approach to Open Space

It is suggested that the Council should require all major developments (i.e. housing developments of 10 or more units and commercial developments of greater than 1000m<sup>2</sup> floorspace to provide at least 10% of the site area as useable public green open space (i.e. in addition to private gardens). It should be noted that some site allocations might specifically require more than 10% of the site to be for open space type uses due to the specific circumstances of the site.

Two other approaches were considered:

- a. To include open space within the tariff: This would mean that developments would not have to provide any significant on-site open space. Irrespective of the environmental consequences of that it is not considered that such an approach would lead to acceptably designed developments since the result would be developments with little greenery;
- b. To have a different figure than 10%: 10% is considered appropriate since it is the level that has been enshrined within the Council's Supplementary Planning Guidance on Public Open Space;
- c. To not require the space to be 'green': The suggested requirement that the open space should be green or natural is based largely on environmental consideration and the Council's view that greenery is an important component in all developments. It is recognised that this may be contentious in the case of some central sites where hard landscaped open-space might be the preference of the developer. However the Council considers a simple blanket policy would be more appropriate and does not mean that individual proposals cannot put forward alternatives that the Council would consider on their individual merits.

#### Policy Area 23: Strategic Flood Defence

It is suggested that the need and importance of the Ipswich Flood Defence Strategy should be central to the Core Strategy document. This is reflected within the objectives set out in Chapter 7 of the Preferred Options document. As such it should be recognised as one of the key pieces of infrastructure to which funding from the Planning Gain Tariff (Policy Area 13) could be used as matched funding to help secure national flood defence funding. It is recognised that the tidal surge barrier is unlikely to be in place for a number of years but the Council will work with the Environment Agency to try to ensure it is implemented as soon as possible and that, in the short term, as much preparatory work as possible is undertaken to enable the scheme to be delivered as soon as the funding can be secured.

The IP-One Area Action Plan will need to have particular regard to the flooding issues and the need to phase some developments to relate to the delivery of the tidal surge barrier. Part C of the Preferred Options document should include policies relating to flooding to reflect PPS25 and the detailed findings of the Ipswich Strategic Flood Risk Assessment. In the interim period it is recognised that the Council needs to work with its partners to put in place better arrangements to cope with emergency planning scenarios associated with flooding.

Three other approaches were considered:

- a. To conclude that flooding considerations should be completely outweighed by other considerations: The Council believes that flooding is a serious issue for the town and one that should be addressed fully by the implementation of the Flood Defence Strategy. The other relevant considerations (mainly set out in 8.505) do not outweigh the flooding concerns – particularly when the Council believes there is a suitable solution to the problem.
- b. To rule out all further developments within the floodplain until the barrier is in place: There are already many approvals for development within the floodplain (mainly approved prior to the introduction of the December 2006 PPS25). Whilst some further developments (of certain types in certain locations) should probably be ruled out, each development and site will need to be considered on its merits and it may be possible for some developments to be acceptable from a flooding perspective or that other considerations outweigh flooding ones in individual cases. PPS25 provides extensive guidance on this area.
- c. To rule out all future developments within the flood plain even if the barrier were put in place: This would be based on the fact that even with a barrier in place there would still be a residual element of flood risk due to the fact that it may fail or be over-topped. However these eventualities are considered to be worth the risk.

#### Policy Area 24: Provision of Health Services

It is suggested that the Council should support the bringing together of health sector facilities onto the Heath Road site, including some mental health services and a new GP surgery, providing:

- they can be fully justified by patient needs;

- they take account of the need to plan for anticipated population growth and other demographic changes that might impact on health service provision in the Ipswich area;
- a broader health sector strategy for the wider Heath Road Hospital site is produced that takes account of the patient and growth needs issues outlined above and the need for adequate car parking and travel plan measures.

It is essential to the Council that the health sector can demonstrate that the Heath Road site can accommodate the combination of various health care uses in a satisfactory self contained way. In the event that the above can be adequately demonstrated then the Council would be prepared to positively consider the release of parts of the St Clements site for residential use – this should be set out in more detail within the Site Allocations document.

Two other approaches were considered:

- a. To not address the issue in this document: Taking this approach would mean no guidance would be provided on the strategic aspects of health provision and bearing in mind the importance of the subject and the significance of the issue raised above the Council considers it should be included here.
- b. To actively proposed new GP surgeries: On balance it is not considered that this is a strategic issue requiring a policy within the Core Strategy. However the Council feels it is important that the issue is referred to within this document and an expectation therefore set out that issues associated with specific surgeries be dealt with within other documents.

#### Policy Area 25: Waterfront & Town Centre Transport

There are serious concerns about highway capacity in the town centre particularly within the Star Lane area. These capacity implications are closely linked to issues associated with the wider transport network - including the A14 and the Orwell Bridge. As a consequence of this concern and the continuing pressure being applied in this area by further major developments the Council supports the provision of significant alternative east / west capacity. This could, as an example, take the form of a Wet Dock Crossing which is proposed within the IP-One document or a northern bypass which is referred to within Policy Area 26. In terms of the Wet Dock Crossing it should also be acknowledged that the Council's long-term aim includes the redevelopment of the Island site, as this is essential to the successful completion of the Waterfront regeneration. It is recognised that the provision of a Wet Dock Crossing is unlikely to happen without the Island site coming forward for redevelopment. If the capacity implications were acceptable (e.g. following the provision of alternative capacity) then significant change should be proposed for the Star Lane area and that the principle of the Buchanan's work makes sense - i.e. to reduce both Star Lane and College Street to a single lane from their existing two lanes. This would need to be set out in more detail within the submission document for the IP-One Area Action Plan.

The above factors taken together means that significant change in the Star Lane area is more likely to happen in the medium-long term, rather than the short-medium term. Public transport is an important part of the transport package and as such the Core Strategy should continue the Council's in principle support for the Ipswich: Transport Fit for the 21st Century scheme. This would improve bus station provision, passenger information, shuttle bus provision and pedestrian links between the town centre and the railway station and Waterfront. More details on these proposals should be included in the IP-One Area Action Plan. The issue of funding any such work would need further examination but possible sources include Local Transport Plan, Growth Point, a link to flood defence funding and developer contributions via the tariff proposed within Policy Areas 13 and 19.

Three other approaches were considered:

- a. Not including support for the Ipswich: Transport Fit for the 21st Century scheme: Public transport and pedestrian improvements in the centre of the town are vital to the town's future prosperity. The above scheme forms, in principle, the basis for delivering such improvements and has already met with broad support and regional recognition. Therefore it seems particularly appropriate to continue the Council's in principle support for it.

- b. Proposing the Buchanans solution without alternative capacity: The Council believes that this would have a seriously detrimental impact on other roads within Ipswich and also the A14 due to significant dispersal of traffic across the network. It is considered that this would be likely to negatively impact on the vitality and viability of the centre of the town by making it less accessible to all modes of transport.
- c. Not proposing significant change to the Star Lane gyratory: It is recognised that this area is a significant problem and because the Council believes there is an achievable and acceptable solution then this option is not supported.

#### Policy Area 26: The A14

As set out within Policy Area 25 the Council considers that major changes are needed to the Star Lane gyratory system but that alternative capacity is needed to make any such major changes acceptable. As a consequence the Council is supporting a Wet Dock Crossing within its Core Strategy. However it is recognised that there are significant uncertainties about the delivery of such a scheme. Therefore the Council also supports the active investigation of the main alternative east – west route. This is a possible northern bypass to the town. It is recognised that any such route would be within the Suffolk Coastal District Council and Mid Suffolk District Council areas and therefore it is not practical to include such a route within this Strategy. The Council will encourage those authorities together with Suffolk County Council and other interested parties to actively investigate such a route and would be prepared to contribute to any such investigation. In terms of a possible new junction onto the A14 the Council recognises that there are merits in a new link road for the Port and local communities currently affected by Port traffic. But the Council does not propose to allocate a new east bank link road at this stage for the reasons set out in the Preferred Options document.

Two other approaches were considered:

- a. Taking a different approach to a northern bypass: Whilst the Council cannot actively propose the bypass, since it is outside the Borough, it is appropriate to suggest that it be properly considered as part of work on the wider Ipswich Policy Area and as, in some ways, an alternative to the Wet Dock Crossing – which in itself has delivery challenges;
- b. Proposing an East Bank Link Road: Whilst, environmental issues notwithstanding, there are benefits to a new Link Road it is not considered that there is a reasonable likelihood of it being delivered prior to 2021 due to the current Highways Agency position and the policy problems associated with proposed retail development which is the only likely source of funding.

#### Policy Area 27: Electricity Capacity

It is suggested that land be allocated within the IP-One Area Action Plan for the provision of a larger sub-station in the vicinity of the existing Turret Lane sub-station.

One other approach was considered: To not address the issue in this document: Taking this approach would mean each development trying to resolve electricity issues on a case by case basis and would be likely to be counter-productive in the long-term and a restraint on development.

### **Development control policies**

#### Policy Area 28: Carbon Footprint

It is suggested that a relatively simple policy approach should be introduced that relates to the Strategy and that should prescribe targets without actually constraining the developer as to how these should be achieved. These should relate to:

- The direct climate change consequences of the development itself in terms of its design, construction, use of buildings and likely travel patterns; and
- The whole life costs of the development.

It is considered that a policy can be worded to reflect this and linked to the Vision, Guiding Principle 1, Objectives 1 and 2 and Policy Area 1.

A number of other approaches have been considered but they fall into three broad categories:

- a. To not address the issue in this document: Whilst this is a national issue there are some distinct Ipswich factors to it – and bearing in mind the importance given to this area in the Strategy and the fact there is not an established all encompassing national standard in place it is appropriate to introduce an Ipswich level policy;
- b. To focus on one aspect of the sustainability agenda; This would be likely to result in that one thing being done well in Ipswich but probably at the expense of other areas;
- c. To set specific targets for different issues: The Council is of the view that it is the total impact that is the most important factor and that specific area based targets can in any event become dated quite quickly.

#### Policy Area 29: Flooding and Sustainable Urban Drainage

Dealing with each of the two areas highlighted in the Preferred Options document:

- The Strategic Flood Risk Assessment sets out the relevant issues and developments within the floodplain should be required to address them;
- All developments should be required to minimise their impacts on the town's drainage system by a range of means including sustainable urban drainage systems where they are appropriate.

One other approach has been considered: To not address the issue in this document: Whilst this is a national issue there are some distinct Ipswich factors to it – and bearing in mind the importance given to this area in the Strategy it is appropriate to introduce an Ipswich level policy.

#### Policy Area 30: Urban Design Policy

It is felt that it is essential to produce an Ipswich specific policy basis for urban design. This should deal with setting a requirement that proposals include appropriate design statements that demonstrate that they:

- Recognise the key features of the urban environment within which they are proposed;
- Retain key features on site – be they natural (e.g. trees), buildings (whether listed or not) and boundary features;
- Limit taller buildings to the arc to the south and west of the town centre;
- Respect the largely smaller scale of the town centre;
- Positively contribute to the public spaces of the town;
- Are to a better standard of design than that which would have been deemed acceptable in 2007.

One other approach has been considered: To not address the issue in this document: Whilst this is a national issue there are some distinct Ipswich factors to it – and bearing in mind the importance given to this area in the Strategy it is appropriate to introduce an Ipswich level policy.

#### Policy Area 31: Protecting Our Assets

The growth of the town proposed within the Regional Spatial Strategy increases the importance of the towns assets on various levels:

- There will be more people to enjoy them;
- More key assets and facilities are likely to be needed;
- The pressure for the development, and sometimes loss, of the towns assets may also increase.

It is considered that it would be appropriate to construct a protection policy to cover in a generic manner the natural and historic built environment that addresses issues including:

- Recognising the over-riding primacy of whatever national (etc) designation is relevant;
- Taking account of the contribution the asset makes in its own right in natural, built heritage or cultural terms;
- Taking account of the importance of the asset to the town as a whole;
- Proposals for the loss of a recognised asset – even if only locally recognised – will be resisted unless an equivalent of equal, or better, quality is first provided.

In all of the above the key factor is arguably that its importance needs to be from a wide public perspective rather than just to an individual or one or two people.

One other approach has been considered: To not address the issue in this document: Whilst this is a national issue there are some distinct Ipswich factors to it – and bearing in mind the importance given to this area in the Strategy it is appropriate to introduce an Ipswich level policy;

#### Policy Area 32: Small Scale Residential Development

It is suggested that a policy be introduced that picks up on the issues highlighted in paragraph 10.72 of the Preferred Options document and that in addition it includes a requirement to prevent any surface water run-off from the site onto any other land, be it highway or otherwise.

One other approach has been considered: To not address the issue in this document: Whilst this is a national issue there are some distinct Ipswich factors to it, e.g. the 'terracing effect', and it is considered to be a policy area that has been particularly effective in recent years – hence the effective proposal to continue it.

#### Policy Area 33: Bedsits and Other Types of Houses in Multiple Occupation

It is suggested that the approach outlined in paragraphs 10.87 of the Preferred Options document is built on by including reference to appropriate cycle parking and the need to ensure compliance with relevant environmental health standards.

Two other approaches have been considered:

- a. To not address the issue in this document: Whilst this is a national issue there are some distinct Ipswich urban factors to it – and bearing in mind the possible increases of accommodation sought in this area it is appropriate to retain an Ipswich policy basis;
- b. To set an overload standard: This could have taken the form of stating that no more than a certain % of units in any road would be acceptable as bedsits. However it is considered that there is not likely to be one standard % that would be acceptable, or unacceptable, in all cases so it is felt more appropriate to leave it in the fairly flexible nature the current policy wording uses.

#### Policy Area 34: Travel Demand Management

It is suggested that an approach is developed which requires the submission of a travel assessment for all major developments and that they should deal with a set series of key issues including:

- Normal modal split targets for the type and scale of development;
- Proposals to reduce the car component of that substantially due to the design of the development;
- Production of a travel plan that sets targets and penalties for the nondelivery of targets;
- An assessment of the impact on the local highway network with appropriate mitigation measures proposed as necessary; and
- An assessment of the air quality and noise impacts of the development with appropriate mitigation measures proposed as necessary.

One other approach has been considered: To not address the issue in this document: Whilst this is not just an Ipswich issue the Council believes it is important that it sets out its expectations for demand management and the importance of green travel plans.

#### Policy Area 35: Parking

It is suggested that a policy is set out that has components to it that provide for:

- Limited (i.e. only operational) car parking associated with non-residential development in the centre of town and appropriate controls over public car parking (i.e. not increasing the long-stay parking stock);
- Minimum standards of cycle parking for all new residential proposals and major commercial proposals; and

- Maximum car parking standards for other developments.

These should be based on the documents set out in paragraphs 10.112 and 10.113 of the Preferred Options document.

One other approach has been considered: To have a radically different policy from that which exists: It is considered that the current policy basis could be better brought together into one document but other than that the current system works reasonably well.

#### Policy Area 36: Proposals in Retail Areas

It is suggested that the current Local Plan planning policy is built upon by establishing:

- A primary, secondary and speciality shopping area within the town centre that relates to the existing one within the First Deposit Draft Local Plan. This should be defined in the IP-One Area Action Plan;
- Control of frontages within those areas to ensure certain proportions of A1 use – in line with the standards in the First Deposit Draft Local Plan;
- Similar standards for the district and local shopping centres as set out within Policy Area 2 and the First Deposit Draft Local Plan;
- Support for community facilities, particularly within and adjacent to the District Centres.

It suggested using the revised Use Classes Order to look at refining the approach to food and drink. As a result, cafes and restaurants that are active during the day time (A3 uses) would now be permitted within the retail percentage of the primary, secondary and speciality areas, whilst bars and hot food takeaways (A4 and A5 uses) would not as they tend to present dead frontages during the daytime.

One other approach has been considered: To radically change the existing policy basis: The current policy position is little changed in the last decade and has been used successfully to protect the retail position of the town – although some flexibility is suggested for certain food and drink proposals.

#### Policy Area 37: Proposals involving the Loss of Housing Units

It is suggested that a policy is set that would only allow proposals that would lead to a net loss in residential units if the new use were a necessary community facility or the existing units did not meet market demands.

One other approach has been considered: To not address the issue in this document: Whilst this is not just an Ipswich issue the Council believes that on balance there is not clear enough protection provided by other Policy Areas, national or regional policy. As a result, it is considered that a separate policy is necessary.

#### Policy Area 38: Detailed Affordable Housing Policies

It is suggested that the Policy should make it clear that the percentage should be calculated on floorspace or habitable rooms rather than unit numbers. Development should also have regard to their provision reflecting the mix of unit types within the development unless an alternative form is agreed with the Council based on local needs. In exceptional circumstances, the Council will allow the off-site provision of a development's affordable housing requirement. This is only likely to be supported in the event that: (i) the off site provision would result in more units than would have been provided on-site (ii) they would better meet identified local housing needs; (iii) an actual off-site scheme is identified that would make up the provision; (iv) there is a valid justification as to why on-site provision is not considered appropriate; and, (v) the overall result supports the concept of sustainable communities with affordable housing appropriately located and integrated across the town.

One other approach has been considered: To not address the issue in this document or to address it within the Strategy section of this document: It is considered to be too much of a detailed issue to



sit appropriately within the Strategy however it is considered to be important in ensuring the Council achieves an appropriate balance of affordable units that best meet local needs rather than focussing purely on the number of units.

## 7.2. Comparison of the social, environmental and economic effects of the options

### Assessment methodology

The policies and their alternatives were assessed against the 22 SA objectives listed in Chapter **Error! Reference source not found.** using the scoring system in Table 7.4. For each SA objective the impact on the indicators associated with them (see Appendix 1) were considered and possible direction of impact recorded.

*Table 7.4: SA scoring system*

Symbol	Effect
++	Strong positive
+	Positive
0/+	Weak positive
0	Neutral
-/0	Weak negative
-	Negative
--	Strong negative
+/-	Both positive and negative

A summary of the results can be seen in Table 7.5, whilst the full results for each policy option can be seen in Appendix 3. Appendix 3 also records any secondary, short, medium or long term effects for each policy and options. Synergistic effects have been noted with the secondary effects. The overview and summary is based on the long term effects.

### Appraisal results

Of the 38 policy areas, the preferred policies scored the highest in 27 and the joint highest in another two. In the nine other policy areas, one of the alternative options was given a higher score. There were seven policy areas in which one or more of the alternative(s) could not be scored due to lack of information or poor wording, and therefore were given a ?, with the preferred policy gaining the highest score by default. The ten policy areas in which the alternative options scored more highly are dealt with below:

#### *Policy Area 4*

For policy area 4, the preferred option was outscored by alternative 1. This was largely because the aim of alternative 1 was to include “lots of protection policies”. Whilst this is a generalised statement, it was deemed to suggest a stronger focus on defending protected sites from development than the preferred option. Nevertheless, the preferred option itself was found to be generally positive, though could have scored higher had it been opposed to the “major change” advocated for the Wet Dock and Central Conservation Area.

#### *Policy Area 5*

For policy area 5, the preferred option was outscored by alternative 1. As with PA4, this was largely because the alternative aimed to include specific policies on urban design, whilst the preferred option would have left it to the more generalised core strategy approach. Not including specific policies may also lead to a situation where it is harder to attract investment due to poor urban design.

#### *Policy Area 6*

For policy area 6, the preferred option was outscored by alternative 1. This was due to the fact that alternative 1 suggests that joint working with surrounding district councils and the county council should begin immediately, rather than the preferred policy’s suggestion of waiting until the new

local plan is published. Beginning joint working now would prevent any mismatching of development around the borough's boundaries (i.e. not locating housing, employment or transport infrastructure appropriately). Nevertheless, the preferred option still scores positively.

*Table 7.5: SA scores for the 38 policy areas*

Policy Area	Preferred policy	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Highest score
1	+10	-8	+2	+1	+1	+2	Preferred policy
2	+13	-9	-7	?			Preferred policy
3	+8	-8	?				Preferred policy
4	+2	+8	+4	-2			Alternative 1
5	+2	+8	-6				Alternative 1
6	+8	+10	+2	-6			Alternative 1
7	-7	?	?				Preferred policy
8	+10	+2	+8				Preferred policy
9	+9	-9	+18				Alternative 2
10	+10	?	0				Preferred policy
11	0	-4	-1	-3			Preferred policy
12	+2	+4	-4				Alternative 2
13	+19	+13	0	-10			Preferred policy
14	+2	+4	?	-2			Alternative 1
15	-2	-6	-4				Preferred policy
16	+6	-5	+5	?			Preferred policy
17	+12	-10	?	?			Preferred policy
18	+13	-8	-8				Preferred policy
19	+6	-3	0	-4	-3		Preferred policy
20	+6	0	+4				Preferred policy
21	+8	-5	0				Preferred policy
22	+3	-2	?	-1			Preferred policy
23	+4	+1	0	-11			Preferred policy
24	+2	0	+5.5				Alternative 2
25	-2	-6	+3	-3			Alternative 2
26	-7	0	-9				Alternative 1
27	+3	-2					Preferred policy
28	+4	-3	?	?			Preferred policy
29	+6	0					Preferred policy
30	+9	-1.5					Preferred policy
31	+4	-5					Preferred policy
32	-1	-5					Preferred policy
33	+4	-2	+4				Preferred / Alt. 2
34	+5	-8					Preferred policy
35	+4	?					Preferred policy
36	+9	-3					Preferred policy
37	+4.5	+1					Preferred policy
38	+2	0					Preferred policy

#### *Policy Area 9*

For policy area 9, the preferred option was outscored by alternative 2. This was because alternative 2 suggested a higher density of housing, which would reduce the amount of land required for housing development (thus reducing the amount of greenfield land needed or increasing the amount of land available for employment), increase the possibilities for CHP schemes and potentially reduce trip generation as more people would be within walking/cycling distance of services. Nevertheless, the preferred option still scores positively, though it could score more highly by supporting a higher density.

#### *Policy Area 12*

For policy area 12, the preferred option was outscored by alternative 1. This was solely because alternative 1 supported allocating more sites for travellers, whilst the preferred policy stated that there was no need. Nevertheless, the preferred option still scores positively, though it could score more highly by supporting the allocation of more sites.

#### *Policy Area 14*

For policy area 14, the preferred option was outscored by alternative 1. As with policy area 12, this was solely because the alternative proposed a higher number of affordable homes than the preferred policy. Nevertheless, the preferred option still scores positively though it could score more highly by supporting a higher level of affordable housing.

#### *Policy Area 24*

For policy area 24, the preferred option was outscored by alternative 2. This was because alternative 2 suggested actively proposing new GP surgeries (something the preferred policy did not do), thereby increasing access to key services. Nevertheless, the preferred policy still scored positively overall, and the policy of alternative 3 could be merged into it.

#### *Policy Area 25*

For policy area 25, the preferred option was outscored by alternative 2. This was entirely due to the fact that the preferred policy lent its support to additional east-west road capacity (which is likely to increase traffic) and for a wet dock crossing (which may damage the Wet Dock conservation area and the River Orwell wildlife site), whereas alternative 2 supported an overall reduction in road capacity and no wet dock crossing.

#### *Policy Area 26*

For policy area 26, the preferred option was outscored by alternative 1. This was because the preferred policy supported the building of a northern bypass and a Wet Dock crossing. The northern bypass is likely to increase road traffic, worsen air quality, use greenfield land, and may damage an SLA and archaeological sites, whilst the Wet Dock crossing may damage a wildlife site and conservation area as well as increasing traffic. In contrast, alternative 1 does not support either development, and therefore is effectively neutral, though in the long-term it may constrain development in Ipswich.

### **7.3. Description of the significant sustainability effects**

The significant sustainability effects of the preferred options (prior to the acceptance of any recommendations for change made in section 7.5) are described in section 8.

### **7.4. Why the preferred options were chosen**

The Core Strategy contains justifications for choosing each of the preferred options over the alternatives.

### **7.5. Any proposed mitigation measures**

Even in cases where their scores were positive overall, most of the preferred policies still had negative scores on one or more sustainability indicators. However, in many cases, these negative impacts are mitigated by the existence of other policies intended to be used in tandem or it is possible to remove or mitigate possible negative impacts by changes to wording. In some cases where it is not possible to mitigate a negative effect, monitoring is necessary to check if it actually occurs and to enable action to be planned to deal with at a later date. These measures are detailed below on a policy-by-policy basis. If a policy is missing, this means that there were no negative impacts.

#### *Policy Area 2*

The preferred option for policy area 2 (location of development) scores negatively on two aspects; conservation of soil resources and flood risk. In the first case, the policy states that any development on the northern fringe should contain a district centre; however, such development would use greenfield land. This negative can be avoided by stating opposition to development in the northern fringe (as occurs in Policy Area (PA) 11). In the second case, it suggests focussing development around district centres; however, at least two of the district centres are in or adjacent to flood risk zones (e.g. Bramford Road and Duke Street). This can be mitigated by specifically

including a proviso on development in flood risk areas, requiring designs to minimise flood damage to homes and businesses in the absence of the protection of the proposed flood barrier (PA23).

#### *Policy Area 4*

The preferred option for policy area 4 (protecting assets) advocates major change for the Wet Dock and Central Conservation Area. This development may damage the townscape of central Ipswich. However this is mitigated by IP-One policy 63 Urban design guidelines, which requires development be appropriate for the character of the area including consideration of appropriate height.

#### *Policy Area 5*

The preferred option for policy area 5 (urban design) scores negatively because it does not include any specific policies on urban design. This is mitigated by PA30: Urban design policy included in the Development control policies.

#### *Policy Area 7*

The preferred option for policy area 7 (amount of housing) generated several negative impacts, largely as it concerned large amounts of development for housing (possibly built in flood risk zones, requiring greenfield land, damaging biodiversity), and the related impacts of an increased population (higher energy use and waste levels), increased traffic and worsened air quality. Some of these issues can be avoided completely, by stating that greenfield land, protected areas and flood risk zones will not be considered for development, (although it is recognised that this is difficult given the level of growth expected by the RSS) or that development in such areas will ensure no damage or increased risk (e.g. in the case of flood risk zones, that the ground floor would not be inhabited). The issues of energy use, waste and traffic are almost impossible to avoid, but can be mitigated through support for carbon-neutral or low carbon developments, (as suggested by development control policy PA 28 Carbon footprint) ensuring space for recycling facilities, and support for sustainable transport.

#### *Policy Area 8*

The preferred option for policy area 8 (house/flat balance) has one negative; the possibility of an increased risk of flooding if dwellings are built in the flood plain. This can be mitigated by either stating that no development will be allowed in flood risk zones, though this is problematic in central Ipswich, or supporting policies which minimise risk (e.g. building flats where the ground floor is not inhabited, or flood-proofing homes).

#### *Policy Area 10*

The preferred option for policy area 10 (previously developed land) scores negatively on two issues; flood risk and biodiversity. Significant amounts of PDL in Ipswich are in the flood risk zone along the river, though this can be mitigated as mentioned in the policy area 8 section above. In terms of biodiversity, PDL sites may have greater biodiversity potential than agricultural greenfield sites, and developing them may harm wildlife. This can be mitigated by ensuring that development includes green space.

#### *Policy Area 11*

The preferred option for policy area 11 (greenfield land) scores negatively on one issue; not designating a development site means that PDL must be used (which may harm biodiversity). This is mitigated by Policy Area 4 and 31 as it seeks to protect important natural assets, assumed to include BAP species.

#### *Policy Area 15*

The preferred option for policy area 15 (number of jobs) generated several negative impacts, largely as it concerned a significant increase in the number of jobs (18,000). The negatives included an increase in traffic and a subsequent worsening of air quality, an increase in the amount of waste and energy used, the possibility that greenfield land may be required for development, and the possibility of a large influx of people to fill the new jobs disrupting the community. Whilst

most of the issues are largely unavoidable, mitigation is possible through specific support for measures such as improving sustainable transport (bus services and cycle lanes, see PA 34 for major development), co-location of jobs and housing, low carbon or carbon-neutral development and waste plans. National policy already requires that development of land follows a sequential approach that would seek to maximise the use of previously developed land before Greenfield.

#### *Policy Area 19*

The preferred option for policy area 19 (non-residential planning gain tariff) scores negatively on one particular issue, traffic generation, because it supports investment in transport infrastructure. This could be mitigated by including a commitment to ensuring that infrastructure for sustainable transport modes would be enhanced using the tariff funding.

#### *Policy Area 20*

The preferred option for policy area 20 (education provision) scores negatively on several issues, all of them related to the new sixth form centre. This is due to the fact that the site for the centre is (a) greenfield land, (b) home to protected species, and (c) contains an archaeological site. Whilst the use of greenfield land can only be mitigated by choosing a new, brownfield, site, the impact on biodiversity and archaeology can be mitigated by ensuring that the grounds of the new school include a biodiversity area and that rescue archaeology takes place during the construction phase.

#### *Policy Area 22*

The preferred option for policy area 22 (approach to open space) scores negatively on one particular issue, conserving soil resources. This is because a 10% requirement for open space may result in extra land being needed for development. However, this issue is difficult to mitigate against beyond suggesting an increase in housing density (though this cannot apply to commercial developments), or scrapping the requirement for open space (which would make the policy null).

#### *Policy Area 23*

The preferred option for policy area 23 (strategic flood defence) scores negatively on one particular issue, flood risk. Whilst the policy is aimed at combating this, it notes that although the tidal surge barrier will not be in place in the short-term, development will still be allowed to proceed in the flood risk zone. This could be mitigated against by preventing development until the barrier is completed, though this in turn has several negative consequences, such as constraining development and leaving derelict land. In the short term a clear requirement for design sympathetic to potential flood risk is recommended.

#### *Policy Area 24*

The preferred option for policy area 24 (health services) scores negatively on two particular issues, the possible development of greenspace at the St Clements site if the hospital is closed and the site used for housing, and the impact of protected species known to be living on the site. This can be mitigated against by a statement to the effect that any development would not reduce the level of greenspace, and ensuring that the development was (a) sympathetic to biodiversity and (b) carried out at a time at which the species would be least effective (as suggested in PA31 Protecting our assets).

#### *Policy Area 25*

The preferred option for policy area 25 (waterfront and town centre transport) scores negatively on three particular issues; the possibility of increased traffic levels and potential damage to a Conservation Area and wildlife site. This is because it lends support to increasing east-west road capacity and the construction of a Wet Dock crossing. The issues of damaging the Conservation Area and wildlife site can be mitigated by careful construction and appropriate design. However, the negative effects of an increase in road capacity are virtually impossible to mitigate against. Monitoring traffic levels, congestion (vehicle delay) and air quality would be appropriate to enable mitigatory actions to be planned as necessary in the longer term.

#### *Policy Area 26*

The preferred option for policy area 26 (the A14) scores negatively on several issues; increased traffic levels, the use of greenfield land, potential damage to wildlife sites, archaeological sites, a conservation area and an SLA. Most of these are related to the construction of a northern bypass, and whilst damage to archaeological sites can be mitigated against, the effect on the landscape, the use of greenfield land, are irreversible impacts and an increase in traffic are almost impossible to mitigate against. Mitigation measures for the Wet Dock crossing are described under policy area 25.

#### *Policy Area 27*

The preferred option for policy area 27 (electricity capacity) scores negatively on two particular issues; energy use and potential damage to the conservation area. The issue of damage to the conservation area can be mitigated by ensuring that any development is appropriate for the area and that it is carefully designed. The issue of energy use cannot be mitigated for this particular policy, but PA28 Carbon footprint should include a general goal to reduce energy consumption.

#### *Policy Area 31*

The preferred option for policy area 31 (protecting our assets) scores negatively on one particular issue; hampering development. Protecting the built and natural environments may mean constraining development of potential housing and employment sites. This can be mitigated against by ensuring that if construction occurs, it does not disturb biodiversity and that design is appropriate to the surroundings.

#### *Policy Area 32*

The preferred option for policy area 32 (small scale residential development) scores negatively on several issues; it notes the need for parking facilities, but ignores the need for recycling provision and energy use minimisation/renewable energy production. This could be mitigated by dropping the demand for parking, or demanding minimum levels of parking availability, and by stating support for waste facilities and low carbon or carbon neutral development (e.g. renewable energy schemes such as solar water heating, or CHP schemes).

#### *Policy Area 33*

The preferred option for policy area 33 (bedsits and other types of houses in multiple occupation) scores negatively on one issue, energy use. This can be mitigated by including support for renewable energy or CHP schemes.

#### *Policy Area 37*

The preferred option for policy area 37 (proposals involving the loss of housing units) has one minor negative regarding a possible decrease in housing availability. However, as this would only happen at the expense of community facilities, or if the existing units did not meet market demands, it is probably better to retain the policy as it is, as changing it may create more negative issues than it solves.

## 8. LIKELY SIGNIFICANT EFFECTS OF THE PLAN

### 8.1. Significant social, environmental and economic effects of the preferred policies

The significant effects of the 38 preferred policies are summarised in Table 8.1 overleaf. The final column shows the combined impact on the 22 sustainability indicators of the preferred policies. For the most part the overall effect is positive, though there are a few issues.

On the criteria of reducing waste, the policies record a combined score of –2 suggesting the plan is not likely to encourage waste minimisation or recycling. Although there were positive scores for policies 1 (sustainable development) and 33 (bedsits), these were outweighed by negative scores for policies 7 (amount of housing) and 15 (number of jobs), and a double negative for policy 32 (small scale residential development). There is no clear statement anywhere that promotes waste minimisation or provision of local or community facilities to enable recycling for residential and employment developments. Therefore action must be taken to correct this deficiency, ideas for which are outlined in chapter 10.

Two other issues, reducing contributions to climate change and conserving and enhancing biodiversity, both had very low scores of just 1 and 3 respectively, suggesting the strategy needs to focus more on these issues. Five policies were negative on reducing greenhouse gas emissions; amount of housing (7), number of jobs (15), electricity capacity (27), small scale residential development (32) and bedsits (33). However there is potential to mitigate these by specific wording concerning energy minimisation being included in the 2 policies (1 and 28) that scored ++. For biodiversity, seven policies had negative impacts; amount of housing (7), PDL (10), greenfield land (11), education provision (20), health services (24), waterfront and town centre transport (25) and the A14 (26). Policy 31 Protecting our assets has the potential to provide mitigation if it is strongly worded regarding protection and enhancement to the biodiversity asset.

Whilst they scored positively overall, a significant number of policies recorded possible negative effects for reducing traffic (9), air quality (9) and encouraging efficient patterns of movement in support of economic growth (8). This does suggest that the plan lacks a clear statement encouraging the use of sustainable modes of transport. There is a Development control policy (34) that encourages Travel plans for major development. The supporting text will need to clarify what constitutes major development, which if it uses normal planning standards is quite small in an urban context (over 10 housing units). The number of negatives was also a concern regarding conserving soil resources (6) and conserving areas of historical importance (5). These issues were strongly linked with policies advocating development of housing, employment land or transport infrastructure, particularly preferred policies 7, 15, 20, 25 and 26.

In contrast, there were four indicators for which none of the 38 policies recorded a negative score; improving access to key services, revitalising town centres, maintaining and improving access to education and skills and minimising crime and anti-social activity. Although some of these did not score particularly high overall it is good that these aspects will benefit from the implementation of the plan.

Table 8.1: Sustainability appraisal of the core strategy preferred policies

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	T		
ET1. To improve water and air quality	+	+	+	0	0	+	-	+	+	+	0	0	+	0	-	0/+	+/-	++	+/-	+/-	+	0	0	+	-	--	0	0	+	0	+	-	+/-	+	+	+	+	0	0	12	
ET2. To conserve soil resources and quality	+	-	0	0	0	+	-	+	+	++	?	0	0	0	-	0	++	0	+	-	++	-	+	+	0	--	+	0	0	0	+	0	0	0	0	0	0	0	0	0	8
ET3. To reduce waste	+	0	0	0	0	0	-	0	0	0	0	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	--	+	0	0	0	0	0	-2		
ET4. To reduce the effects of traffic upon the environment	+	+	+	0	0	+	-	+	+	+	0	0	+	0	-	0/+	+/-	++	-	+/-	0	0	0	+	-	--	0	+	0	0	0	0	-	+/-	+	+	+	0	0	9	
ET5. To improve access to key services for all sectors of the population	0	++	+	0	0	+	0	+	0	+	0	0	+	0	0	0	0	+	0	0	0	0	0	+	+	0	0	0	0	0	0	0	?	0	0	++	0	0	12		
ET6. To reduce contributions to climate change	++	0	0	0	0	0	-	+	+	0	0	0	0	0	-	0	0	0	0	+	0	0	0	0	0	0	0	-	++	0	0	0	--	-	0	0	0	0	1		
ET7. To reduce vulnerability to climatic events and increasing sea levels	++	-	0	0	+	0	-	-	0	-	0	0	0	0	0	0	+	0	0	0	0	0	++	0	0	0	0	0	+	0	0	+	0	0	0	0	0	0	5		
ET8. To conserve and enhance biodiversity	+	0	0	+	0	0	-	0	0	-	-	0	+	0	0	0	++	0	+	-	+	+	0	--	-	-	0	0	0	++	+	0	0	0	0	0	0	0	0	3	
ET9. To conserve and where appropriate enhance areas and sites of historical importance	0	+	0	+	0	0	-	0	0	+	0	0	+	0	0	0	++	0	0	-	0	0	0	0	-	--	-	0	0	++	+	0	++	0	0	0	0	0	5		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0	0	0	-	0	0	-	0	0	+	0	0	+	0	0	0	+	0	0	0	0	+	0	0	-	--	+	0	0	++	+	+	0	0	0	0	+	0	5		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	+	0	0	+	0	0	-	0	0	+	0	0	+	0	0	0	0	0	+	0	+	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	6		
HW1. To improve the health of those most in need	0	++	+	0	0	+	0	+	+	0	0	0	++	0	0	0	0	0	0	0	0	+	+	0	+/-	0	0	0	0	0	+	+	0	+/-	+	+	+	0	0	15	
HW2. To improve the quality of life where people live and encourage community participation	0	+	0	0	+	0	0	0	0	+	0	0	++	0	-	0	+	0	+	+	+	+	+	-	--	0	0	0	0	0	+	+	++	+	+	0	0	++	0	14	
ER1. To reduce poverty and social exclusion	0	+	+	0	0	+	0	+	0	+	0	+	+	+	++	0	+	+	+	+	0	0	-	0	0	0	0	0	0	0	0	?	-	0	0	0	+	0	13		
ER2. To offer everybody the opportunity for rewarding and satisfying employment	0	+	+	0	0	+	0	+	0	0	0	0	+	0	++	0/+	+	+	+	+	0	0	+	0	+	0	0	0	0	0	-	0	0	0	0	+	0	0	13		
ER3. To help meet the housing requirements for the whole community	0	+	0	0	+	0	++	+	+	0	0	+	0	+	-	0	0	0	0	0	0	0	0	+	+	0	++	0	0	+	0	-	+	+	0	0	0	0/-	++	14	
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	0	+	+	0	0	0	0	0	0	0	0	0	+	0	++	0	0	+	+	+	0	0	0	0	+	++	+	0	+	0	-	0	0	0	0	+	0	0	12		
ER5. To revitalise town centres	0	+	0	0	0	0	+	+	+	+	+	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0	0	0	0	+	0	0	11	
ER6. To encourage efficient patterns of movement in support of economic growth	0	+	+	0	0	+	0	+	+	+	0	0	+	0	-	0/+	+/-	++	-	+/-	0	0	0	+	-	--	0	+	0	0	0	-	+/-	+	+	+	0	0	9		
ER7. To encourage and accommodate both indigenous and inward investment	0	0	0	0	-	0	-	0	+	0	0	0	+	0	0	0/+	+	+	+	+	0	0	+	0	+	++	+	0	+	0	-	0	0	0	0	0	0	0	0	9	
CL1. To maintain and improve access to education and skills for both young people and adults	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	+	0	0	0	++	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6		
CD1. To minimise potential opportunities for crime and anti-social activity	0	+	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	+	+	0	0	0	+	0	6			
Total	10	13	8	2	2	8	-8	10	9	10	0	2	19	2	-2	3.5	12	13	6	6	8	3	4	2	-2	-7	3	4	6	9	4	-1	4	5	4	9	4.5	2			



### **8.1.1. Short, medium and long term**

The assessment of the policies suggested that in several cases, there would be different effects in the short-, medium- and long-term. These are listed below:

#### Employment

In policies advocating development, it is likely that in the short-term there would be a large number of construction jobs created. This requires planning for dealing with a possible influx of construction workers, many of whom may be migrant workers.

#### Transport

The effects of the suggestions for a Wet Dock crossing and a northern bypass are likely to be only in the long term, as it would not be developed for several years, and therefore have no immediate impact.

#### Carbon emissions

A long term effect of reducing carbon emissions is a reduction in vulnerability to climatic events and flooding.

### **8.1.2. Secondary**

The assessment of the policies suggested that in several cases, there would be secondary effects. These are listed below:

#### Biodiversity

A secondary effect of the flood barrier is that it may affect the Stour & Orwell Estuaries Special Protection Area downstream from it by reducing water flow, or by changing the flooding pattern. This may mean that an Appropriate Assessment is required, as detailed in Section 3.8.

#### Crime and anti-social behaviour

Several policies advocate economic growth for Ipswich. This may have a secondary effect of reducing crime and anti-social activity, as tends to occur in more economically successful areas. In contrast, policies which block development (such as 31) may have the opposite effect.

#### Energy use

For policy 37 (loss of housing units), it is suggested that the demolition of housing units and rebuilding of new, different style may result in the average energy efficiency of homes being increased.

#### Health

Several policies advocate economic growth for Ipswich. Together with improved education levels (policy 20), this may have a secondary effect of improving the average health status of Ipswich residents, as those in employment tend to be more healthy both physically and mentally than those out of work. In contrast, policies which block development (such as 31) may have the opposite effect.

#### Inward investment

Under the green corridors policy (21) and the urban design policy (30), it is suggested that a greener or better designed environment may help to make Ipswich more attractive as an investment location.

#### Retail

Policies advocating an increased number of residents in Ipswich may have the secondary effect of increasing the town centre's customer base, thereby increasing its vitality.

#### Waste

A serious concern with waste is the effect of an increased number of flats. Where there are shared recycling facilities, the system often breaks down because one out of 20 residents may put in the

wrong sort of rubbish, resulting in the binmen refusing to empty the bin and no-one being willing to take responsibility for the situation. In some cases bins can remain unemptied for months, meaning that residents have to put all their waste in the black bins. Flats also do not have brown bins, and therefore residents cannot send suitable kitchen waste for composting.

Under policy area 15 (number of jobs), it is suggested that an increased number of businesses will make business waste recycling more economically viable, thereby increasing the possibilities for recycling. Improving education levels of Ipswich residents (policy 20, education provision) may also help to increase the recycling rate.

#### Water quality

A secondary effect of reducing surface-run off (policy 32, small scale residential development) may mean that less water is absorbed into the ground, negatively affecting groundwater levels.

#### **8.1.3. Cumulative**

The cumulative effects of the preferred policies appear particularly strong on facilitating improvements to health, quality of life and provision of housing (highest scores in Table 8.1). High cumulative scores are also recorded for reducing poverty which is linked to the availability of employment plus improving air and water quality (mainly due to air quality impacts stemming from traffic management), improved access to services and economic growth. These are perhaps the areas you would hope to see high in an urban context so it is encouraging that the SA suggests many of the policies proposed contain components that should lead to these outcomes.

The weakest sustainability aspects stemming from the cumulative appraisal of the policies are for the reduction of waste, climate change and biodiversity. The implications of this are looked at in Section 10.

#### **8.1.4. Synergistic**

Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects can occur as habitats, resources or human communities get close to capacity. Possible synergistic effects that could occur in this plan could stem from a density of housing being achieved that triggers the provision of new services (e.g. doctors surgery, bus service, recycling scheme or combined heat and power scheme). In a sense this is planned for and anticipated in policies 13 and 19 that seek to establish residential and non residential planning gain tariffs.

#### **8.1.5. Permanent and temporary**

There are two main temporary effects of the preferred options. The first of these relates to construction; as a significant amount of development is planned, this will result in the need for more construction workers in the area. This may result in an influx of migrant workers, which may affect community relations. The workers will require housing, though only until the construction has ended.

A specific temporary effect of policy area 23 (strategic flood defence) is that until the tidal surge barrier is completed, flood risk will remain at its present level, or possibly worse due to the effects of climate change. In the long-term, risk should be significantly reduced by a barrier.

A significant permanent effect would be the building of a northern bypass for Ipswich, as the effects on the landscape would be effectively irreversible.

## 9. REPORTS ON POLICY COVERAGE

### 9.1. Range of policies in the plan document

The Council considered whether or not to include a wide array of policy areas within this document. The list below sets out the main one's that it has been concluded not to propose as preferred options within this document along with a brief explanation as to why not.

Protection of the countryside, wildlife sites; trees; open space, playing pitches and/or allotment land  
Policy Areas 4 and 31 provide a basis for protecting assets. It is not considered necessary to have separate policies dealing with each and every type of asset particularly as many possible policies would just be duplicating protection standards set out at national level.

#### Water Supply and Conservation

Water supply and particularly conservation is effectively addressed within Policy Areas 28 and 29 and it is not felt necessary at this stage to have a separate policy on this. This will be reviewed following the completion of the Water Cycle Study that is currently being undertaken for the Haven Gateway Partnership.

#### Energy Supply and Conservation

Energy supply and conservation is effectively addressed within Policy Areas 28 and 29 and it is not felt necessary at this stage to have a separate policy on this.

#### Air Quality

Air quality is referred to within Policy Area 34 and is also a factor in Policy Areas 28 and 29. Specific site based issues associated with air quality are likely to be addressed within the IP-One Area Action Plan and the Site Allocations and Policies documents – particularly in relation to the town's three existing Air Quality Management Areas. In addition, Planning Policy Statement 23: Planning and Pollution Control provides strong guidance on air quality issues. Having considered all these factors it is not considered that a separate policy is necessary.

#### Developments in Conservation Areas

The town's Conservation Areas are key assets and would therefore be covered by Policy Areas 4 and 31. It is also the intention to complete the preparation and publication of conservation area character appraisals for all 14 areas. In addition the Planning (Listed Building and Conservation Areas) Act 1990 and Planning Policy Guidance Note 15: Planning and the Historic Environment (1994) provide an appropriate legislative and guidance background. Having considered all these factors it is not considered that a separate policy is necessary.

#### Protection of residential amenity

This is a long-standing and central component of the planning system and is enshrined within many Planning Policy Statements and Guidance Notes as well as planning appeal case law. It is also a central component of the Vision (see paragraph 7.20). Whilst it is an issue that is relevant to a number of Policy Areas, particularly Policy Area 32, it is not considered necessary to have a separate policy on the subject.

#### Proposals affecting scheduled ancient monuments and other archaeological sites

These are key assets of the town and are therefore protected by Policy Area 31. In addition Planning Policy Guidance 16: Planning and Archaeology (1990) provides strong guidance on the issue. Having considered all these factors it is not considered that a separate policy is necessary.

#### Protection of community facilities, tourism and arts and entertainment Facilities

Policy Area 31 provides a basis for protecting cultural assets. It is not considered necessary to have separate policies dealing with each and every type of asset.

#### Advertisements

The control of advertisements is controlled by national Regulations and Planning Policy Guidance Note 19: Outdoor Advertisement Control (1992). It is not considered that a separate policy is necessary.

#### Proposals affecting listed buildings

The town's listed buildings are key assets and would therefore be covered by Policy Areas 4 and 31. In addition the Planning (Listed Building and Conservation Areas) Act 1990 and Planning Policy Guidance Note 15: Planning and the Historic Environment (1994) provide an appropriate legislative and guidance background. Having considered all these factors it is not considered that a separate policy is necessary.

#### Proposals for tall buildings

Policy Areas 5 and 30 address urban design issues. In addition proposals that include tall buildings related to conservation areas or listed buildings would need to be considered in the context of the Planning (Listed Building and Conservation Areas) Act 1990 and Planning Policy Guidance Note 15: Planning and the Historic Environment (1994). Having considered all these factors it is not considered that a separate policy is necessary that deals with tall buildings in general. However, the IP-One Area Action Plan should set out policies and guidance on the appropriate scale of development for key sites within the central.

#### Control of goods that can be sold from out-of-town retail warehouses

Retailing is addressed within Policy Areas 18 and 36. As stated at paragraph 10.140 of the Preferred Options document, it is not considered necessary to have policies that address out-of town shopping since the position on further out-of-town retailing is made clear in Policy Area 18 and any proposals for out-of-town retailing could be assessed against the Strategy and Planning Policy Statement 6.

#### Trees

Trees protected via Tree Preservation Orders (TPOs) benefit from appropriate protection via relevant legislation and regulation and the Council has the ability to make further TPOs where trees merit protection. The Council also has a degree of control over works to other trees in conservation areas. Policy Area 30 sets out an additional basis for protected key trees. As a result of all these factors, it is not considered that a separate policy is necessary.

#### Gypsies and Travellers

This issue is covered within Policy Area 12 and it is not considered that a separate policy is needed.

#### Land adjacent to the river and recreational opportunities

In part this is addressed via Policy Areas 23 and 29. In addition, specific opportunities for recreation should be identified, if, as and where appropriate within the IP-One Area Action Plan and the Site Allocations and Policies document.

#### Telecommunications development

It is not considered that there is a distinctive policy that could be produced for Ipswich to address this subject. The Council believes it is sufficient to rely on the advice contained within Planning Policy Guidance Note 8: Telecommunications (2001).

## 10. LIST AND DESCRIPTION OF THE MITIGATION MEASURES

### 10.1. Changes to the plan resulting from the SA process

This appraisal concentrates on assessing individual Policy Areas and sites that are set out within the Borough Council's Preferred Options documents for its Local Development Framework. In that context it is important to bear in mind the following three factors:

- That in practice proposals would be assessed against the policies of the local development framework as a package rather than against a single policy. As a consequence it is not necessary for individual policy areas to cover every possible aspect that might effect its assessment within this report. This does mean that some of the negative scoring referred to within the individual Policy Area assessments in this document is mitigated by what is included in other Policy Areas. Chapters 8, 14 and 19 bring the individual assessments for each Policy Area contained in Chapters 7, 13 and 18 together for each of the three documents;
- The Preferred Options are in general conformity with the draft East of England Regional Spatial Strategy. In particular this means that they seek to ensure that the housing and jobs targets for Ipswich within that document are addressed within the Preferred Options documents. For some individual assessments negative impacts have been highlighted within this report largely because of the growth levels involved and it is recognised that it is not the role of this assessment to reappraise the draft Regional Spatial Strategy;
- The Borough Council has taken a clear decision within its Preferred Options documents not to duplicate the contents of national guidance or legislation. In some areas, particularly those relating to the 'protection of assets', this has resulted in some negative impact scores because such matters are not always directly mentioned in the Preferred Options because in the Borough's view they are addressed at other levels.

The assessment of the relative sustainability of the policies and their options leads to 1 main recommendation:

1. Policy Area 24: Provision of health services – Active support for the establishment of new GP surgeries should be included in the final core policy wording. This would strengthen the implementation of the plan in the longer term in achieving the outcome of increasing access to key services. The current preferred policy seems to concentrate on site specific issues and hence does not have a longer policy view to deal with possibly currently unanticipated developments in the future. (section 7.2 Policy Area 24)

It is also noted:

2. There is a Development control policy (34) that encourages Travel plans for major development. The supporting text will need to clarify what constitutes major development, which if it uses normal planning standards is quite small in an urban context (over 10 housing units).

Section 7.5 suggests a number of areas that need mitigation, some of which are achieved by the application in parallel of other policies. The following sets out the common themes emerging that need to be addressed when construction the final wording of the preferred policies. (References to where the issues are evidenced are given in brackets).

3. Flood risk: There is a need to include mention of the need for design sensitive to flood risk for properties in flood zones in the short to medium term before the tidal barrier is completed. This is not adequately included in any of the proposed policies (PA 2, 23 and 29) and it is needed to enable sustainable development to take place in the short and medium term.  
(Section 7.2 PA 2 and PA23)

4. Use of previously developed land: A presumption in favour of developing previously developed land before greenfield is included in the vision but it would be helpful to mention it in the supporting text to PA15 to remind users of the plan that this is overriding national policy.  
(Section 7.2 Policy area 15)

5. Carbon neutral, renewable energy schemes, Combined Heat and Power – It is noticeable that these are not promoted in the plan even though large scale high density development is proposed where these could be practicable. Support for these should be expressed and would link with Policy area 28 (carbon footprint).  
(section 7.2 Policy Area 32 and 33)

6. Waste minimisation – The plan overall appears to do little to encourage waste minimisation. Reference to residential and non residential development conforming BREEM standards of construction incorporate design aspects to ensure that new development has planned space for 3 bins to facilitate recycling. On going work linked to the Business Improvement District (BID) is seeking to reduce the distribution of plastic carrier bags. This aspect needs to be included in detail in Policy Area 28 Carbon Footprint.  
(Section 8.1 and 8.1.1)

7. Biodiversity – This is another aspect where the plan has not scored well. This highlights the need for strong wording to be included in Policy Area 31 (Protecting our assets) which at the moment is a bit of a catch –all (covering natural, built and cultural). Judging by the relatively low scores for the SA objectives 9 and 10 covering sites of historical importance and distinctive landscape and townscapes, Policy Area 31 is not very effective in implementing protection for them either. The policy needs to be amplified so that it seeks not to just protect assets but to enhance them as well.  
(Section 8.1)

8. Carbon footprint: The appraisal suggests that the plan policies are not very effective in reducing contributions to climate change despite Policy Area 28 covering the carbon footprint. It is recommended that the wording of Policy Area 28 makes specific reference to energy minimisation, including support for renewable energy schemes, waste minimisation and recycling and support of sustainable transport.  
(Section 7.2 Policy Area 27 and Section 8.1)

9. Sustainable transport: Negative effects recorded for reducing traffic, air quality and encouraging efficient patterns of movement in support of economic growth suggested the plan lacks a clear statement encouraging the use of sustainable modes of transport. Policy Areas 13 (Residential Planning gain tariff) and 19 (Non residential planning gain tariff) both need to make clear that they will be seeking contributions to improvements to sustainable modes of transport (public transport, cycling and walking). They currently only refer to “transport” and major capital infrastructure associated with growth. Smaller scale sustainable infrastructure needs to be provided and the plan needs to be clear that it promotes the use of sustainable transport by residents and visitors.  
(Section 7.2 Policy Area 7, 15 and 19)

## **10.2. Proposed mitigation measures**

It is considered that the recommended changes in 4.1 will provide mitigation for most of the significant effects identified in this appraisal.

For Policy Area 25 where proposals for increased road capacity cannot be mitigated it is suggested that monitoring of traffic levels, congestion and air quality need to be undertaken and actions considered before levels get so high that an Air Quality Management Area is declared.

## **10.3. Uncertainties and risks**

Several of the alternatives mentioned in the plan did not have sufficient details to enable an appraisal of their effect to be undertaken. These have been recorded as uncertainties in addition to

circumstances where the appraisal is so complicated that the direction of an impact cannot be made, although it is thought it might have an impact. Table 8.1 has very few uncertainties which is good because it means that on the whole policy areas are clear in what they are intending and outcomes relate well to the SA objectives. Some effects are recorded as being + or - because they are summarising composite situations that could go either way depending on what is implemented on the ground. This is not the same as there being uncertainty about the impact. Where there are uncertainties, monitoring is required to check that an undesirable negative impact is not occurring and if it is mitigation action can be taken.

The three Policy Areas with uncertain effects shown on table 8.1 are associated with indicators included in the SA Framework and so change will be monitored.

## **11. MONITORING MEASURES**

### **11.1. Links to other tiers of plans and programmes and the project level**

Some of the indicators included in the SA Framework are associated with targets in other plans and programmes. The relationship to the Regional Spatial Framework and Ipswich Community Strategy are mentioned in Plan. The SA framework seeks to reuse indicators where ever possible to reduce the burden of data collection. It particularly uses indicators that are statutory requirements for the RSS and LDFs. The Suffolk Community Strategy is currently being developed and targets agreed. However new indicators have recently been proposed in the National Indicator Set that will be replacing the Best Value Performance Indicators in 2008/9. It is recognised that the SA indicator set will need to be updated to reflect new measures introduced.

Core strategy policies proposing major infrastructure projects are likely to have monitoring programmes associated with them and they could form a sub set of data to the indicators included below. This will help in monitoring the sustainability of particular policies.

### **11.2. Proposals for monitoring**

It is proposed that all of the indicators included in the SA framework (Appendix 1) are monitored. Particular attention needs to be given to the following to monitor the uncertainties identified in Table 8.1:

% of new development on PDL

% of new developments within 30 minutes public transport time of: a GP; hospital; primary school; secondary school; areas of employment; an major retail centre (Mandatory LDF indicator)

% of population living a Lower Super Output Area which ranks in the top 10% of most deprived according to the index of multiple deprivation.

For Policy Area 25 where proposals for increased road capacity cannot be mitigated it is suggested that monitoring of traffic levels, congestion and air quality need to be undertaken.



## **SECTION D**

# **SITE ALLOCATIONS AND POLICIES**

## **12. MAIN OBJECTIVES OF THE PLAN**

### **12.1 Statutory Purpose**

In formal terms this Site Allocations and Policies Preferred Options Development Plan Document is intended to fulfil the requirements of the second stage of the five stage Local Development Framework production process (i.e. the Regulation 26 stage under the Town and Country Planning Act (Local Development)(England) Regulations 2004.

### **12.2 Links with national policy**

Site Allocations and Policies Preferred Options Development Plan Document has to be prepared in the context of national policy documents, specifically the Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs), Government White Papers and planning circulars. It is not necessary to repeat national policy in the plan but it often needs to be interpreted in a local context of mentioned in the supporting text to assist in the use of the document.

### **12.3 Link to Core Strategy, Structure or Local Plans**

The links to other documents are described within the Preferred Options document. In particular the Site Allocations document builds on the Policy Areas set out within the Core Strategy and Policies document.

### **12.4 Outline of Content**

The Preferred Options paper produced in November 2007 does not contain a vision or objectives since these are contained within the Core Strategy document. It contains three Policy Areas which would apply to sites or areas within the Borough of Ipswich but outside the IP-One Area Action Plan area. It also contains a series of proposed site allocations for different uses which are summarised in tables and then more detail provided within the appendices on a site by site basis.

### **12.5 Consultations Carried Out**

Consultation on the Issues and Options for the proposed Development Plan Document was undertaken in January and February 2005. That 2005 consultation was very broad and further consultation undertaken on specific sites and possible use options in June 2006. A final stage of Issues and Options consultation took place in February 2007 when further sites and possible options were put forward following them being suggested during the 2006 consultation.

### **12.6 Compatibility of Plan Objectives with SA Objectives**

Since this plan does not contain any objectives this section is not relevant.

## 13. MAIN ALTERNATIVES TO THE POLICY FRAMEWORK

### 13.1 Preferred policies and options considered

The site allocations and policies document lays out three policies. In addition to the preferred options, the document covers a number of alternative options which were considered alongside the chosen one. This section will provide a brief review of the policies and the alternatives.

In addition the site allocations document puts forward proposals for over 80 sites. Appraisal tables for all of these are contained in the Appendices.

#### Policy Area 39: The Protection of Identified Sites for the Uses Proposed

It is suggested that policies should be produced that would effectively reserve the sites for the use(s) put forward.

An alternative approach was considered:

a. Not to have a policy covering this issue: This would really mean that any site could then be developed for any use providing it met other policy aspects. Following this route would mean the Council would have no control over whether it would meet its targets and equally would not provide any certainty to potential developers or other interested parties.

#### Policy Area 40: The identification, protection and development of Green Corridor

It is suggested that the Council continues the same policy basis as set out in the First Deposit Draft Local Plan. This would involve identifying the following Green Corridors:

- Between Bramford Lane Allotments and Whitton Sports Centre playing fields and grounds, Whitton Church Lane and adjoining countryside;
- Between Christchurch Park and the playing fields north of Whitton Church Lane and adjacent countryside;
- Between Christchurch Park and the countryside to its north;
- Between the Cemetery and the AXA Playing Fields, Tuddenham Road and adjacent countryside;
- Between Woodbridge Road and Bixley Heath;
- Between St Helens Street and the Orwell Country Park and surrounding countryside;
- Between the Gipping Valley path near Station Bridge and Belstead Brook Park and adjacent countryside;
- Between Gyppeswyk Park and Belstead Brook Park and adjoining countryside;
- Between Gyppeswyk Park and Chantry Park and adjacent countryside;
- Between the Wet Dock and Sroughton Millennium Green and adjacent countryside.

In addition an additional corridor is proposed that would effectively aim to link spaces around the edge of the town by means of a 'green rim' around the town. A policy would then need to be created relating to proposals for development on sites falling within the green corridors or green rim where the Council would seek to establish attractive green links, improvements to local biodiversity, and to provide for public access wherever practicable through:

- the retention of natural features and wildlife habitats such as trees, hedgerows and ponds;
- comprehensive landscaping which is appropriate to local wildlife, being of native origin and local stock and appropriate to the defined habitats of the area; and
- the establishment of public access.

Two alternative approaches have been considered:

- a. To have a green corridor policy: The approach suggested above is basically in general conformity with the Core Strategy and builds on the Council's existing policy basis. It is considered that the existing green corridor policy has been reasonably successful but that it needs longer to fully succeed and therefore it is logical to include such an approach with this document (*note for the purpose of the appraisal it is assumed that this was meant to read to 'not' have a green corridor policy*);
- b. Not to have a green rim approach: The approach suggested above is basically in general conformity with the Core Strategy. The policy basis suggested at paragraph 6.33 of the Preferred Options document is considered appropriate for this concept as well as for the long-standing green corridors.

Policy Area 41: The identification and protection of employment areas.

It is suggested that the Council should identify its existing employment areas and have a policy basis that supports, in principle, office, light industrial, general industrial and warehouse and distribution proposals and like with Policy Area 39 effectively sets any other uses as contrary to policy. Other policies of the Core Strategy and Policies document, and national documents such as Planning Policy Statement 6: Planning for Town Centres would also apply to certain development proposals. This would effectively build on policies EMP3, EMP4 and EMP5 of the First Deposit Draft Local Plan.

The employment areas would be:

- Anglia Park, Bury Road;
- White House Industrial Estate, White House Road;
- Hadleigh Road Industrial Estate;
- Knightsdale Road / Wharfedale Road;
- Land south of London Road / east of Scrivener Drive;
- Cliff Quay/Sandy Hill Lane / Landseer Road area;
- Greenwich Business Park;
- Cobham Road Area;
- The Drift / Leslie Road / Nacton Road;
- Ransomes Europark.

Two alternative approaches have been considered:

- a. To not address the issue in this document: Whilst this is not just an Ipswich issue the Council believes that on balance there is not clear enough protection provided by other Policy Areas, national or regional policy. As a result, it is considered that a separate policy is necessary.
- b. To establish a policy basis to protect other uses that relate to the jobs target (e.g. retail): It is felt that there is a stronger degree of protection provided by other national and local policies for other types of job provision. In addition for retailing there is less development sector pressure via proposals for the possible loss of shops, and thereby related jobs, than there is on employment areas.

## 13.2 Comparison of the social, environmental and economic effects of the options

### Assessment methodology

The policies and their alternatives were assessed against the 22 objectives list in Chapter 5 using the scoring system in Table 13.1. For each SA objective the impact on the indicators associated with them (see Appendix 1) were considered and the possible direction of impact recorded.

*Table 13.1: SA scoring system*

Symbol	Effect
++	Strong positive
+	Positive
0/+	Weak positive
0	Neutral
-/0	Weak negative
-	Negative
--	Strong negative
+/-	Both positive and negative

A summary of the results can be seen in Tables 13.2 and 14.1.

### Appraisal Results

Of the three policy areas, the preferred options scored highest on the two which it was possible to score. Policy Area 39 could not be scored since it is seeking to reserve the sites proposed to the uses allocated to them and therefore the impact will vary from site to site. Further detail on this is provided on a site by site basis and this is contained in the Appendices. A summary of the overall outcome if included and commented upon after table 13.2.

*Table 13.2: SA scores for the three policy areas*

Policy Area	Preferred policy	Alternative 1	Alternative 2	Highest score
39	?	?		Not enough information (see below)
40	+10	-4	-4	Preferred policy
41	+4	-4	?	Preferred policy

### *Summary of the Sites Assessment*

In terms of the outcomes from site specific assessments these are detailed in the appendices. The general over-arching issues are commented upon with section 14.1. In terms of individual sites the sustainability appraisal scores inevitably vary. It is the better scoring sites which should, in sustainability assessment terms be considered for development before addressing the more complicated alternatives.

Considerable detail on the site assessments is contained in the Appendices and it is recognised that to minimise possible negative impacts of development and maximise possible positive impacts there are often requirements for development to be planned and designed in a way which, for instance, avoids the removal of protected trees, and preserves sites which are of archaeological importance.

## 13.3 Description of the significant sustainability effects

The significant sustainability effects of the preferred options (prior to the acceptance of any recommendations for change made within the appraisal) are described in section 14.

#### **13.4 Why the preferred options were chosen**

Two of the three Policy Areas (39 and 41) effectively provide some certainty as to what uses are appropriate for specific sites or areas. As such this should also help the Council meet its core Regional Spatial Strategy housing and jobs targets. The links between these two Policy Areas and the outcome of the SA are not strong.

The green corridor Policy Area (40) is significantly influenced by SA outcomes since the continuation and extension of this existing Policy Approach is strongly supported by sustainability considerations.

The individual sites were influenced by the Core Strategy Policy Areas which are assessed within Part B and have clearly been influenced by a range of data collected and consulted upon at Issues and Options stage.

#### **13.5 Any proposed mitigation measures**

As a result of the nature of the three Policy Areas it is not considered that mitigation measures are required. The findings of the site specific appraisals indicate some negative impacts for some sites and in some areas. In some cases it will be possible to mitigate these impacts either within specific proposals within each site allocation or as a result of the general Core Strategy and Policies proposals that should guide development proposals.

In some cases where it is not possible to mitigate a negative effect, monitoring is necessary to check if it actually occurs and to enable action to be planned to deal with at a later date. These measures are commented upon within the Appendices.

## 14. LIKELY SIGNIFICANT EFFECTS OF THE PLAN

### 14.1 Significant social, environmental and economic effects of the preferred policies

The significant effects of the 3 preferred policies are summarised in table 14.1. The final column shows the combined impact on the 22 sustainability indicators of the preferred policies. For the most part the overall effect is positive, though there are a few issues associated with the site specific proposals contained within the Appendices.

In terms of the Overall Outcomes from site specific assessments these are detailed in the appendices. There were two main issues which emerged, notably the need to address flood risk at a strategic level, and to ensure that an assessment of the ecological value of sites proposed was undertaken.

There are frequent requirements to development to be planned and designed in a way which avoids the removal of protected trees, and preserves sites which are of archaeological importance.

Where there are multiple sites proposed for various uses, it is generally the case that some sites are significantly simpler in terms of constraints and mitigation, when compared to alternatives; it is these sites which should, in sustainability assessment terms be considered for development before addressing the more complicated alternatives.

*Table 14.1: Sustainability appraisal of the preferred policies*

	39 (P)	39 (1)	40 (P)	40 (1)	40 (2)	41 (P)	41 (1)	41 (2)	T (P)
ET1. To improve water and air quality	+/-	+/-	+	0	0	0	0	0	1
ET2. To conserve soil resources and quality	+/-	+/-	+	0	0	0	0	0	1
ET3. To reduce waste	+/-	+/-	0	0	0	0	0	0	0
ET4. To reduce the effects of traffic upon the environment	+/-	+/-	+	0	0	0	0	0	1
ET5. To improve access to key services for all sectors of the population	+/-	+/-	0	0	0	0	0	0	0
ET6. To reduce contributions to climate change	+/-	+/-	+	-	-	0	0	0	1
ET7. To reduce vulnerability to climatic events and increasing sea levels	+/-	+/-	0	0	0	0	0	0	0
ET8. To conserve and enhance biodiversity	+/-	+/-	++	-	-	0	0	0	2
ET9. To conserve and where appropriate enhance areas and sites of historical importance	+/-	+/-	0	0	0	0	0	0	0
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+/-	+/-	++	-	-	0	0	0	2
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	+/-	+/-	0	0	0	0	0	0	0
HW1. To improve the health of those most in need	+/-	+/-	0	0	0	0	0	0	0
HW2. To improve the quality of life where people live and encourage community participation	+/-	+/-	+	0	0	0	0	0	1
ER1. To reduce poverty and social exclusion	+/-	+/-	0	0	0	0	0	0	0
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+/-	+/-	0	0	0	+	-	+/-	1
ER3. To help meet the housing requirements for the whole community	+/-	+/-	0	0	0	0	0	0	0

<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+/-	+/-	0	0	0	+	-	+/-	1
<b>ER5. To revitalise town centres</b>	+/-	+/-	0	0	0	0	0	0	0
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+/-	+/-	+	-	-	+	-	+/-	2
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+/-	+/-	0	0	0	+	-	+/-	1
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	+/-	+/-	0	0	0	0	0	0	0
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+/-	+/-	0	0	0	0	0	0	0
<b>Total</b>	<b>?</b>	<b>?</b>	<b>10</b>	<b>-4</b>	<b>-4</b>	<b>4</b>	<b>-4</b>	<b>?</b>	

In the above table the column headings mean:

39 (P), 40 (P), 41(P) = The Preferred Option for each of the three Policy Areas  
39 (1), 40 (1), 41 (1) = The first alternative given in section 13.1 for each of the three Policy Areas  
40(2), 41(2) = The second alternative given in section 13.1 for each of the three Policy Areas

#### **14.1.1 Short, medium and long term**

The assessment of the Policy Areas suggests that it would be unlikely that there would be different effects in the short, medium and long-term.

However it is possible that there may be different effects as a consequence of the order sites are developed in. It is not possible to predict within the SA how this will occur but to ensure sustainability impacts are maximised where impacts are positive and minimised where impacts are negative it would seem important that the Local Development Framework exercises appropriate control over the release and phasing of different sites for different types of development.

This is not addressed within the Site Allocations and Policies document although it is noted that some comments on timing are made within the individual site allocation sheets contained in the Preferred Options document. It is considered that as far as is reasonable practical the principles of this issue should be addressed within the Core Strategy and Policies document.

#### **14.1.2 Secondary**

Again the assessment of the Policy Areas suggests that it would be unlikely that there would be unlikely to be any secondary impacts.

However it is possible that there may be different effects as a consequence of the order sites are developed in. This will be particularly important in the context of the capacity of existing infrastructure and services in the area of the site and, where appropriate the timely provision of new infrastructure and services.

This is not addressed directly within the Site Allocations and Policies document although it is noted that some comments on timing are made within the individual site allocation sheets contained in the Preferred Options document. It is considered that as far as is reasonable practical the principles of this issue should be addressed within the Core Strategy and Policies document.



#### **14.1.3 Cumulative**

The cumulative effects of the preferred policies appear to be reasonable but their core effect is to provide certainty around what is likely to be acceptable, in use terms, for specific sites and areas.

In terms of the individual sites the cumulative impact is likely to be two fold. Firstly on specific areas of the town where development may be concentrated and the comments in 14.1.2 are relevant in that regard. Secondly on the town as a whole due to the high levels of growth directed to Ipswich within the draft Regional Spatial Strategy where again the comments in 14.1.2 are important but where it would be expected that consideration might need to be given to identifying required major pieces of infrastructure within the relevant development plan document. As examples, within the Site Allocations document land is allocated for a further park and ride site on Nacton Road and for doctors' surgeries in key locations around the town.

#### **14.1.4 Synergistic**

Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects can occur as habitats, resources or human communities get close to capacity. Possible synergistic effects that could occur in this plan could stem from a density of housing being achieved within a particular area that triggers the provision of new services (e.g. doctors surgery, bus service, recycling scheme or combined heat and power scheme). In a sense this is planned for and anticipated in Policy Area 13 and 19 in the Core Strategy document that seek to establish residential and non residential planning gain tariffs.

#### **14.1.5 Permanent and temporary**

There is a potential temporary effect of the preferred options. This relates to construction; as a significant amount of development is planned, this will result in the need for more construction workers in the area. This may result in an influx of migrant workers, which may affect community relations. The workers will require housing, though only until the construction has ended.

A significant permanent effect would clearly be the development that takes place on individual sites.

## **15. LIST AND DESCRIPTION OF THE MITIGATION MEASURES**

### **15.1 Changes to the plan resulting from the SA process**

The assessment of the relative sustainability of the policies and their options leads to 1 main recommendation:

1. Timing of development: The key issue on a general basis related to the timing of development, the potential cumulative impacts this might have and the need to ensure appropriate mitigation measures, infrastructure provision and / or services are in place at the appropriate time to prevent potential negative impacts from happening and to maximise the possible positive impacts. It is recognised that these issues might not all be covered within the Site Allocations and Policies document.

It is also noted:

2. There are detailed comments on the individual sites contained with the appendices that should be considered as part of the on-going Local Development Framework process and also as and when planning applications are received and considered.

### **15.2 Proposed mitigation measures**

It is considered that if the issues in 15.1 were successfully addressed within the Framework then this would provide mitigation for most of the significant effects identified in this appraisal.

### **15.3 Uncertainties and risks**

Several of the alternatives mentioned in the plan, particularly for individual sites, did not have sufficient details to enable a full appraisal of their effect to be undertaken. It is recognised that the growth levels set out in the draft Regional Spatial Strategy effectively influence the preferred use for many sites.

There are a number of uncertainties in addition to circumstances where the appraisal is so complicated that the direction of an impact cannot be made, although it is thought that in some areas there might be an impact. In particular, Policy Area 39 relates to an overall assessment of every allocation proposed within the plan and a direction of impact on a cumulative basis has not been made although the overall outcome summary comments in 13.2 and 14.1 are of particular relevance.

In any event the Policy Areas will be particularly closely monitored as they directly relate to whether the main jobs and housing targets for Ipswich are achieved.

## **16. MONITORING MEASURES**

### **16.1 Links to other tiers of plans and programmes and the project level**

Some of the indicators included in the SA Framework are associated with targets in other plans and programmes. The SA framework seeks to reuse indicators wherever possible to reduce the burden of data collection. It particularly uses indicators that are statutory requirements for the RSS and LDFs. The Suffolk Community Strategy is currently being developed and targets agreed. However new indicators have recently been proposed in the National Indicator Set that will be replacing the Best Value Performance Indicators in 2008/9. It is recognised that the SA indicator set will need to be updated to reflect new measures introduced.

### **16.2 Proposals for monitoring**

It is proposed that all of the indicators included in the SA framework (Appendix 1) are monitored. Annual monitoring will assess progress on each of the sites that are included within the Framework as well as progress towards housing and jobs targets.

## **SECTION E**

### **IP-ONE AREA ACTION PLAN**

## **17. MAIN OBJECTIVES OF THE PLAN**

### **17.1. Statutory purpose**

In formal terms this IP-One Area Action Plan document is intended to fulfil the requirements of the second stage of the five stage Local Development Framework production process (i.e. the Regulation 26 stage under the Town and Country Planning Act (Local Development) (England) Regulations 2004).

### **17.2. Links with national policy**

The IP-One Area Action Plan had to be prepared in the context of national policy documents, specifically the Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs), Government White Papers and planning circulars. It is not necessary to repeat national policy in the plan but it often needs to be interpreted in a local context or mentioned in the supporting text to assist the use of the document by potential developers.

### **17.3. Links to regional, structure or local plans**

The links to Regional Spatial Strategy and Ipswich Community Strategy are described in the IP-One Area Action Plan Preferred Options and Proposals Consultation report.

### **17.4. Outline of content**

The role of the area action plan is to:

1. Provide a clear vision and objectives for IP-One that link with the Sustainable Community Strategy and Core Strategy development plan document and help to meet the community's needs and aspirations;
2. Coordinate the investment decisions of public agencies and private investors to get the best for the area and the town as a whole;
3. Stimulate development;
4. Provide a clear planning framework for the development of the area; and  
Ensure a focus on delivery.

The preferred options paper produced in November 2007 sets out ten objectives related to development within the borough. These are as follows:

1. Support the integration of existing and new communities around the Waterfront through the use of shared community facilities and public spaces;
2. Improve the retail offer of the town centre by providing additional sites for shopping in the Central Shopping Area and encouraging small independent shops outside the Central Shopping Area at the Waterfront;
3. Provide for high quality, high density and diverse housing growth within IP-One that meets local needs and attracts new households;
4. Provide for high quality, high density jobs growth within IP-One and ensure that IP-One residents are equipped to fill the new jobs;
5. Promote higher and further education and training opportunities that are accessible to all;
6. Improve sporting and cultural facilities in IP-One to serve the whole borough;
7. Prioritise the convenience and safety of pedestrians, cyclists and public transport users by improving connections between the railway station, Waterfront, town centre, Ipswich Village and the Education Quarter and improving public transport interchanges;
8. Strengthen the role, image and distinctiveness of the town centre, including the conservation or reinstatement of historic street patterns and the conservation of historic buildings in the centre;
9. Safeguard land needed for new infrastructure necessary to facilitate growth within IP-One, e.g. land for a tidal flood barrier at the New Cut;

10. Improve the urban form and environmental performance of central Ipswich, including the river corridor as a key element of green infrastructure, more 'greening' of the streets, and sustainable construction.

It contains 24 policy areas setting out:

1. Sites to be allocated for development within the plan area;
2. The distribution of uses and connections between areas in IP-One;
3. The strategy for Ipswich Town Centre;
4. Land to be protected from development within the plan area;
5. Timetables for the implementation of proposals and any phasing of developments where necessary;
6. Action needed by agencies and landowners to bring sites forward for development;
7. The appropriate scale, mix and quality of development;
8. An urban design framework for developments within the plan area;
9. Environmental improvements needed; and
10. How other planning documents the Council intends to produce will link to the IP-One Area Action Plan

### 17.5. Consultations carried out

Consultation on the Issues and Options for the proposed Development Plan Document was undertaken in January and February 2005. That 2005 consultation was very broad and further consultation undertaken on specific sites and possible use options in June 2006. A final stage of Issues and Options consultation took place in February 2007 when further sites and possible options were put forward following them being suggested during the 2006 consultation.

### 17.6. Compatibility of plan objectives with SA objectives

As part of the SA, it is necessary to assess the compatibility of the 10 core strategy objectives against the 22 SA objectives listed in Table 5.2. The result of this assessment is summarised in Table 18.1 and can be seen in detail in Table 18.2. Positive compatibility is represented by a ✓, negative compatibility with an X, uncertain compatibility with ? and cases with no apparent effect on each other by a 0. Brief reasons for the scores are given.

*Table 17.1: Overall scores of the plan objectives measured against the SA objectives*

Core Strategy Objectives	✓	0	X	?
1. New communities	5	17	0	0
2. Retail	9	10	3	0
3. Housing growth	9	9	4	0
4. Jobs growth	12	6	4	0
5. Education	11	11	0	0
6. Sport and culture	3	19	0	0
7. Sustainable transport	6	16	0	0
8. Town centre	13	9	0	0
9. New infrastructure	4	14	4	0
10. Urban form and environment	9	13	0	0
<b>Total</b>	<b>81</b>	<b>124</b>	<b>15</b>	<b>0</b>

The appraisal of the IP-One Area Action Plan objectives showed them to be generally positive; there were 81 positive compatibilities, 124 neutrals, 15 negatives and no uncertain. All but one of the policies had a positive score overall; in policy 9 (new infrastructure) the problem in terms of compatibilities stemmed from one of the infrastructure proposals that would result in additional road capacity.

Objective 5 Education was interpreted as meaning accessible in the widest sense, covering types of courses for different types of training needs and in transport terms meaning that central learning facilities would be accessible by sustainable transport modes.

The majority of the negative compatibilities (14 of the 15) related to the impact of new development. This included concerns about increased traffic and worsened air quality if a Wet Dock crossing is built (objective 9), development in a flood risk zone (2, 3 and 4), possible damage to the conservation area and townscape (2, 3 and 4), and an increase in waste production (3 and 4). In the latter case, none of the ten objectives had a positive correlation with the SA objective of reducing waste. Another SA objective, ET11 (to protect and enhance favourable conditions on SSSIs, SPAs and SACs), had no correlations; however, this is because there are no SSSIs, SPAs or SACs in the IP-One area.

Several of the negative compatibilities are possible to mitigate; developers can be required to include waste plans, and space can be allocated for recycling facilities. Damage to the conservation area and the townscape can be prevented by careful construction and urban design. Flood risk can be completely mitigated by not building in such areas. However, this is unrealistic in central Ipswich, and so reducing the risk is a more likely measure. This can be done by flood-proofing development (e.g. building flats where the ground floor is not inhabited, or ensuring that houses have waterproof plaster). In the case of the Wet Dock crossing, and the likely impact on increasing traffic, mitigation is extremely difficult.

The other negative impact was related to a lack of development. Safeguarding land for new development (e.g. Wet Dock crossing) may mean that it is left derelict in the meantime. Whilst this is good for biodiversity, it may attract anti-social activity. This can be mitigated by ensuring that derelict sites are difficult to enter (i.e. boarded/fenced properly) and easy to police.





	1. New communities	2. Retail	3. Housing growth	4. Jobs growth	5. Education	6. Sport & culture	7. Sustainable transport	8. Town centre	9. New infrastructure	10. Urban form & environment
<b>HW1. To improve the health of those most in need</b>	✓ Aims to maintain public spaces		✓ High density development may encourage walking/cycling	✓ High density development may encourage walking/cycling	✓ Aims to promote education and training for all	✓ Aims to provide sports facilities	✓ Aims to priorities walking and cycling			✓ Aims for more greening
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	✓ Aims to integrate new & existing communities					✓ Aims to provide cultural facilities		✓ Aims to strengthen image of town centre		✓ Aims for more greening
<b>ER1. To reduce poverty and social exclusion</b>	✓ Aims to integrate new & existing communities	✓ Aims to boost town centre		✓ Aims for high quality jobs	✓ Aims to promote education and training for all			✓ Aims to strengthen town centre		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>		✓ Aims to boost town centre		✓ Aims for high quality jobs	✓ Aims to promote education and training for all			✓ Aims to strengthen town centre		
<b>ER3. To help meet the housing requirements for the whole community</b>			✓ Aims for housing growth that meets local needs							
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>		✓ Aims to boost town centre		✓ Aims for high quality jobs	✓ Aims to promote education and training for all			✓ Aims to strengthen town centre		
<b>ER5. To revitalise town centres</b>		✓ Aims to boost town centre	✓ Increased population may boost town centre	✓ Aims for jobs growth			✓ Aims to improve links to town centre	✓ Aims to strengthen town centre		✓ Aims to improve urban form
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>		✓ Aims to boost town centre	✓ High density development reduces travelling	✓ High density development reduces travelling			✓ Aims to priorities walking and cycling	✓ Aims to strengthen town centre role, reducing trips outwards	X Aims to safeguard land for possible Wet Dock crossing	
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>		✓ Aims to provide new sites		✓ Aims for jobs growth	✓ Higher education levels boosts Ipswich's attractiveness			✓ Aims to strengthen town centre's image	✓ Aims to safeguard land for infrastructure	✓ Aims to improve urban form, which may make Ipswich more attractive
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				✓ Aims to ensure that residents are equipped for new jobs	✓ Aims to promote education and training for all		✓ Aims to improve links to education quarter			
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	✓ Seeks community facilities				✓ Aims to promote education and training for all	✓ Aims to provide sports facilities		✓ Aims to strengthen town centre image	X May result in derelict land, which may have anti-social activity issues	

## 18. MAIN ALTERNATIVES TO THE POLICY FRAMEWORK

### 18.1. Preferred policies and options considered

#### Policy Area 42: The town centre boundary

The Council's preferred approach is to extend the town centre boundary as indicated on the proposals map in the IP-One Area Action Plan:

- Eastwards to include the Education Quarter;
- Southwards to include the Northern Quays of the Waterfront and down the Eastern Quays as far as the brewery, and down Princes Street all the way to Ipswich station; and
- Westwards to include much of the area known as Ipswich Village where an emerging office-led mixed use quarter already includes the AXA building on Civic Drive, the Crown Court and the headquarters of Suffolk County and Ipswich Borough Councils.

Two alternatives were considered:

- Keeping the town centre boundary as it is.
- Extending the town centre boundary differently.

#### Policy Area 43: Site allocations for B1 use

The Council proposes 100% B1 office allocations at:

Site ref.	Site name	Opportunity area	Issues/options site ref	Area (Ha)
UC104	Land to the rear of Grafton House	H	N/A	0.87
UC060	Car park at Princes Street	-	S059	0.42
UC270	Car park to west of Portman Road	I	N/A	0.17
UC043 (part)	Land to the south of Toller Road	C	S041	0.17

The Council proposes B1 office-led mixed use development (80% office +/- 5%) at :

Site ref.	Site name	Opportunity area	Issues/options site ref	Area (Ha)
UC045	Land south of Mather Way	E	S043	0.78

The Council proposes mixed use consisting of 50% B1 (plus or minus 5%) at:

Site ref.	Site name	Opportunity area	Issues/options site ref	Area (Ha)
UC057	Land between Old Cattle Market & Star Land	B	S056	1.71
UC046	Land at Holywells Road West/Toller Road	C	S044	2.06
UC067	Land at Holywells Road East	C	S070	2.30
UC004	Bus Depot South of Sir Alf Ramsey Way	H	S003	1.07
UC042	Police Station	J	S040	0.52
UC047	Land at Wolsey Street	-	S045	0.26

The Council proposes mixed use consisting of 20% B1 and 80% other uses (plus or minus 5%) at:

Site ref.	Site name	Opportunity area	Issues/options site ref	Area (Ha)
UC036	Burttons/St Peters Port	-	S036	0.54
UC054	Southern part of Old Cattle Market, Portmand Road	I	S053	1.90
UC006	Co-op warehouse, Pauls Road	F	S005	0.63
UC011	Smart Street/Foundation Street	B	S009	0.85
UC041	Civil Centre area/Civic Drive	J	S040a	0.73
UC015	West End Road surface car park	G	S013	1.22
UC038	Island site	A	S038	6.02
UC040	Land between Vernon Street and Stoke Quay (community use,		S040a	1.09

Site ref.	Site name	Opportunity area	Issues/options site ref	Area (Ha)
	warehouses)			
UC043	Land between Cliff Quay and Landseer Road (part only)	C	S041	3.78
UC048	Commercial Road	G	S047, S048, S049	4.59
UC053	Land West of New Cut, South of Felaw Street (employment or small scale leisure)	E	S052	0.46
UC055	Land between Lower Orwell Street and Star Land	B	S054	0.40
UC057	Land between Old Cattle Market and Star Land	B	S056	1.71
UC058	Crown Street car park	-	S057	1.95
UC071	Truck & Car company, Cliff Road	C	S075	0.22
UC086	Land north of Ranelagh Road	-	S096	0.36

#### Policy Area 44: Hotels

The Council proposes that hotel development be specified as part of a mixed use development at the following sites:

Site ref.	Site name	Opportunity area	Issues/options site ref	Area (Ha)
UC036	Burtens/St Peters Port	-	S036	0.54
UC052	Shed 8 Eastern Quays	D	S051	0.76

One other approach was considered: To leave it to the market to decide on what is needed, where and when.

#### Policy Area 45: Leisure developments

The Council's preferred approach is to include larger scale leisure as an element in several of the mixed use allocations within IP-One.

Site ref.	Site name	Opportunity area	Issues/options site ref	Area (Ha)	% leisure use
UC054	Old Cattle Market Portman Road (northern part)	I	S053	0.90	100%*
UC029	Jewsons, land west of Greyfriars Road	G	S028	1.03	80%
UC048	Land at Commercial Road	G	S049	0.97	20%

\* Site safeguarded for major leisure complex

Two alternative approaches were considered:

- To not allocate leisure sites.
- To allocate alternative sites.

#### Policy Area 46: Protecting existing employment areas

The Council considers that it would be wise to continue to protect certain employment-based areas within IP-One. The areas to be protected are at:

- Employment Area 1 Offices at Russell Road
- Employment Area 2 Offices at Civic Drive (AXA)
- Employment Area 3 Offices between the Alderman Canal and Handford road
- Employment Area 4 Greyfriars and Princes Street
- Employment Area 5 Cliff Quay

Within these employment areas, other non-employment uses (i.e. not in Use Classes B1, B2 or B8) would not be permitted.

One alternative approach was considered: To reflect the greater mix of land uses being sought.

Policy Area 47: Residential and residential-led mixed use allocations

The Council proposes to allocate the following sites for residential development, as single or mixed use developments as specified:

Site ref	Site name	Opportunity area	Issues & options ref	Area (Ha)	Density H/M/L	Indicative capacity dwellings
<b>Sites for 100% residential use</b>						
UC096	Waterworks Street	B	-	0.31	M	17
UC254	235/255 London Road	F	-	0.16	L	6
UC111	Transco	C	-	0.57	H	94
UC201	Land west of West End Road	-	-	1.03	M	57
UC199	Land east of West End Road	-	-	0.93	M	51
UC007	Ranelagh Road	F	S005	0.50	L	18
UC032	Burrell Road	G	S032	0.74	H	122
UC003	Waste tip north of Sir Alf Ramsey Way	H	S003	1.57	H	259
UC002	Handford Road East	H	S002	0.46	M	25
UC109	NCP car park, Handford Road East	H	-	0.22	M	12
UC012	Peter's Ice Cream	-	S010	0.32	H	53
UC014	Orwell Church	-	S012	0.21	H	35
UC085	240 Wherstead Road	-	S095	0.58	L	20
Sub total						769
<b>Sites for 80% residential use, +/- 5%</b>						
UC011	Smart Street/Foundation Street	B	S009	0.85	H	112
UC055	Land between Lower Orwell St and Star Lane	B	S054	0.40	H	53
UC040	Land between Vernon St & Stoke Quay	E	S039b	1.09	H	144
UC053	Land west of New Cut	E	S052	0.46	H	61
UC056	Orwell Retail Park	F	S055	3.61	L	101
UC006	Co-op warehouse, Paul's Road	F	S055 (part)	0.63	L	17
UC086	Land north of Ranelagh Road	G	S096	0.36	H	48
UC249	St Matthews Street	J	S060	0.40	H	53
UC044	BOCM Pauls	-	S042	0.66	H	211
UC251	Silo, College Street	-	-	0.16	H	21
Sub total						821
<b>Sites for 50% residential use, +/- 5%</b>						
UC038	Island Site	A	S038	6.02	H	497
UC057	Land between Old Cattle Mk & Star Ln	B	S056	1.71	H	141
UC071	Truck and Car Co	C	S075	0.22	H	18
UC046	Holywells Road West/Tollers Road	C	S044	2.06	H	170
UC067	Holywells Road East	C	S070	2.30	M	63
UC052	Shed 8	D	S051	0.76	H	62
UC037	Shed 7	D	S037	1.92	H	158
UC004	Bus depot, Sir Alf Ramsey Way	H	S003	1.07	H	88
UC042	Police Station, Elm Street	J	S040b	0.52	H	43
UC047	Wolsey Street		S045	0.26	H	21
UC001	Land between 81-97 Fore Street		S001	0.12	M	10
UC271	2-6 Russell Road	-	-	1.01	H	83
Sub total						1,336
<b>Sites for 20% residential use, +/- 5%</b>						
UC045	Land south of Mather Way	E	S043	0.78	H	26
UC048	Land at Commercial Road	G	S047,	4.59	H	152

			S048, S049			
UC015	West End Road surface car park	G	S013	0.22	H	40
UC029	Land west of Greyfriars Rd (Jewsons)	G	S028	1.03	H	33
UC054	Old Cattle Market, Portman Road (S)	I	S053	1.6	H	83
UC041	Former Civic Centre	J	S040a	0.73	H	24
UC051	Mint Quarter	K	S050	2.70		89
UC058	Crown House etc., Crown Street	L	S057	1.95		64
UC224	NCP car park, Tower Ramparts	L	-	0.29		4
Sub total						515
<b>TOTAL</b>						<b>3,441</b>

#### Policy Area 48: Cultural Facilities

The Council wishes to see further cultural development in central Ipswich and particularly in the Waterfront area, for the benefit of residents and visitors alike. However, this Area Action Plan has to focus on delivery. At present plans for a specific new cultural facility on a specific site are not well enough advanced to warrant a site allocation within IP-One. This is an area where more work will be needed before such detail can be determined. The Council believes that there is a need for a new art gallery on the Waterfront to display modern art and an appropriate site will be identified within the submission version of this document.

The Council does, however, propose to include the provision of a heritage or cultural based 'attraction' as part of the mix at the Island site, as set out within the opportunity area studies and the site profile in Appendix A. It is envisaged, at a minimum, as a heritage-led regeneration project that relates to the lock that once effectively split the Island Site and its associated buildings (harbour master's office, etc.).

One alternative approach was considered: To earmark a site for a facility as yet undetermined.

#### Policy Area 49: Community Facilities

It is suggested that the Area Action Plan should require the provision of community facilities, either free standing or as part of mixed use developments. This will ensure that the new communities being created can be sustained and have opportunities to integrate with existing ones. Specifically, the proposals would be for:

- A new primary school at Duke Street;
- A community centre/meeting place within the allocations at Holywells Road/Toller Road in opportunity area C, and Ranelagh Road in Opportunity Area F;
- Public toilets and potentially visitor information at Orwell Quay; and
- A community centre/meeting space in Opportunity Area E (Over Stoke/West Bank).

One alternative approach was considered: To leave provision to chance.

#### Policy Area 50: Design and Amenity in Town Centre Living

The Council proposes to include a policy within IP-One that requires:

- The provision of adequate private balcony or roof terrace space in all flats (possible minimum size to be recommended) which avoids overlooking as far as possible, and/or access to high quality communal but private outdoor space that does not face north;
- The provision of adequate storage within the buildings sufficient for at least one cycle and two storage crates per flat;
- The highest possible standard of sound proofing between flats and laying out internal space to minimise potential noise conflicts;
- The avoidance of excessive overshadowing between blocks and by blocks over neighbouring land uses, and of other adverse microclimatic effects resulting from medium and high rise buildings at a high density;
- Daylight to all habitable rooms and no single aspect north-facing homes;

- A management and maintenance plan to be prepared and implemented to ensure the future maintenance of the building and external spaces;
- Flexibility in the internal layout of flats to allow adaptability to different lifestyles;
- A minimum floor area for apartments (English Partnerships are considering introducing 51m sq for a one bed flat and 77 sq m for a two bed flat on sites they own);
- An accessible bin storage area; and
- At least some internal communal space.

Two alternatives were considered:

- To not include a specific policy on this and instead to leave it to general design policies to guide high density developments within IP-One; and
- To impose noise standards in excess of the Building Regulation requirements.

#### Policy Area 51: Sequential Approach to the Location of Development

The suggested approach is set out in the Core Strategy under Policy Area 2 of the Core Strategy. For the IP-One Area Action Plan the suggested approach is to identify the two district centres on the proposals map and show where the 400m 'buffer' extends to. Two district centres would be affected: the existing centre at Wherstead Road and a planned centre at Duke Street (see Policy Area T).

There was one alternative option: To not identify the district centres.

#### Policy Area 52: Key Cycle and Pedestrian Routes

The Council proposes a range of improvements. Further details of the improvements listed below are provided in Part C of the IP-One Area Action Plan.

##### *Opportunity Area A*

- Provision of cycle and pedestrian access across the lock gate at the entrance to the Wet Dock;
- A new foot and cycle bridge across the New Cut from Stoke Quay to link to the Island site and St Peter's Wharf on the Northern Quays;

##### *Opportunity Area B*

- An improved pedestrian environment north-south along Turret Lane and improved pedestrian permeability between Turret Lane and Lower Brook Street;

##### *Opportunity Area C*

- Enhanced cycle and pedestrian linkage from the Waterfront eastwards to Holywells Park;

##### *Opportunity Area D*

- A new pedestrian spine through the Education Campus linking to the Waterfront;
- Enhanced public access along the western edge of Alexandra Park;

##### *Opportunity Area E*

- Improved pedestrian links to local centre at Wherstead Road;
- Improved pedestrian and cycle facilities in Dock Street;

##### *9.31 Opportunity Area F*

- Riverside green corridor with pedestrian and cycle path to link with Compair Reavell site, and pedestrian and cycle bridge to Ipswich Village;
- Improved public realm and pedestrian and cycle facilities in Ranelagh Road and West End Road;

##### *Opportunity Area G*

- Riverside green corridor with enhanced pedestrian and cycle routes to the Waterfront, on north and south banks;
- Improved legibility of routes through Cardinal Park and between the station and shopping centre;

##### *Opportunity Area H*

- A new pedestrian and cycle bridge over the Alderman Canal connecting Cullingham Road to Sir Alf Ramsey Way;

##### *Opportunity Area I*

- Reinstatement of former Friars Bridge road connecting Sir Alf Ramsey Way to the Greyfriars roundabout as a pedestrian route;
- Alterations to Greyfriars roundabout to provide better pedestrian and cycle crossings

#### *Opportunity Area J*

- A new surface level pedestrian and cycle crossing across Civic Drive linking St Matthew's Church to the Wolsey Theatre;
- Enhanced pedestrian linkage between Westgate Street and the New Wolsey Theatre;

#### *Opportunity Area K*

- A pedestrian route into the site that links to the end of the Buttermarket;
- Enhanced pedestrian permeability through the site, east-west and north-south;

#### *Opportunity Area L*

- Enhanced pedestrian links to Christchurch Park;
- Enhanced pedestrian linkage across Crown Street;
- Repave historic lane to Northgate Street as pedestrian priority space.

Two alternatives were considered:

- To leave pedestrian and cycle provision as it is.
- To prioritise different routes.

#### Policy Area 53: Wet Dock Crossing

The Council proposes to safeguard a route as set out in Opportunity Areas C Holywells, A The Island Site, and E Over Stoke, to provide for a Wet Dock Crossing that links Toller Road in the east via the Island Site to Mather Way on the West Bank. This route would provide for through traffic and for access into the redeveloped Island Site. The route would need to allow for boats to pass through the lock at the southern end of the Wet Dock.

Two alternatives were considered:

- To omit this proposal in the plan.
- To safeguard a different line for the route.

#### Policy Area 54: Star Lane and College Street Gyratory

The Council's view is that if the capacity implications were acceptable (e.g. following the provision of alternative capacity such as the Wet Dock Crossing) then significant change should be proposed for the Star Lane area. In that context the principle of the Buchanan's work makes sense - i.e. to reduce both Star Lane and College Street to a single lane from their existing two lanes. This would need to be set out in more detail within the submission draft IP-One Area Action Plan. Thus any change to Star Lane that would affect its capacity would only take place upon the completion and review of compensatory measures as set out in the Core Strategy.

Two alternatives were considered:

- To include firm proposals for change in this document.
- To not propose any change to the Star Lane gyratory.

#### Policy Area 55: Public Transport Improvements

The Council proposes to:

- Provide an additional service or extend the existing free shuttle bus service that currently links Ipswich Village to the town centre to provide connections to the Waterfront, the Education Quarter, and the Railway Station – including a new 'off road' section between Princes Street and Stoke Bridge;
- Support the principles of the Ipswich Fit for the 21st Century major scheme proposal;
- Consider altering the bus gyratory to remove buses from key streets.

A number of alternative approaches were considered as the Ipswich Fit For the 21st Century major scheme was produced.

#### Policy Area 56: Parking Strategy

The Council proposes that car parking on sites to be redeveloped will be replaced as follows:

Site	Proposed allocation	Type of parking	Current parking (no. of spaces)	Replacement spaces to be provided
Mint Quarter	Retail-led mixed use development	Short stay, shopper	450	900
Crown Street	Retail-led mixed use development	Short stay shopper, some contract long stay	1,086	800
Portman Rd UC054	Leisure and office-led mixed use development	Long stay commuter parking	695	Parking to be provided appropriate to development
Portman Rd/ Sir Alf Ramsey Way	Business	Long stay commuter parking	55	None
Surface car park West End Rd UC015	Residential led mixed use	Long stay commuter parking	329	800 to replace existing plus some from Portman Rd
Shed 7 UC037	Residential-led mixed use	Long stay	100	500
Shed 8 UC052	Residential-led mixed use	Long stay	0	590?

The Council proposes to change the Central Car Parking Core, within which it permits only car parking to meet operational needs and short stay shopper car parking. The slightly reduced boundary is shown on the draft Proposals Map (this will be prepared for the Preferred Options consultation).

Alternative options for the Central Car Parking Core were:

- To retain the boundary from the 1997 adopted Local Plan.
- To use the boundary proposed in the 2001 First Deposit Draft Plan.

#### Policy Area 57: The Central Shopping Area Boundary

It is suggested that the Central Shopping Area be extended westwards and northwards, to accommodate new opportunities for additional retail development. The precise boundary is indicated on the draft proposals map in the IP-One Area Action Plan. A linked issue of specific site allocations for retail development is covered in Policy Area S.

Three alternatives were considered:

- Keep it as it is.
- Expand the Central Shopping Area southwards.
- Expand the Central Shopping Area a little in all directions.

#### Policy Area 58: Primary, secondary and speciality shopping areas

The Council proposes to keep the Primary, Secondary and Speciality Shopping Areas, as a means to ensure that shopping remains the primary function at ground floor level within the Central Shopping Area. The suggested boundaries for the primary, secondary and specialist shopping areas within the Central Shopping Area are shown on the draft proposals map.

Two alternatives were considered:

- To retain the existing primary, secondary and specialist shopping area boundaries from the adoption Local Plan.
- Not to identify these frontages or have a policy for them.

#### Policy Area 59: Waterfront Shopping

The Council suggests a new policy that permits speciality or local needs shopping to be provided at the Waterfront without the need to demonstrate need, sequential approach or impact on the



Central Shopping Area. The maximum size for such retail units would be 200 square metres gross. Where more than one such unit were proposed in a scheme, the cumulative floor space would also be taken into consideration. The suggested approach is that for developments of small shops at the Waterfront, where cumulatively their gross floorspace would not exceed 1,000 square metres, the normal PPS6 retail tests of need, sequential approach and impact would not need to be carried out. However, this approach would need to go hand in hand with the imposition of conditions to prevent small units from being combined into bigger ones.

Two alternatives were considered:

- To have no policy.
- To adopt a different maximum size.

#### Policy Area 60: Site allocations for new retail development

It is suggested that the following sites be allocated for primarily retail development. They are indicated on the draft proposals map.

- The Mint Quarter, primarily for retailing plus some residential and either office or leisure. This development will be conditional upon the provision of shopper (short stay) parking within the scheme (an indicative total of 950 spaces).
- Land north of Crown Street for a mixed scheme incorporating large format retail along the Crown Street frontage, to be limited by a minimum net floor space; replacement office space for Crown house; a replacement Policy Area S: Site allocations for new retail development multi-storey car park offering at least the same number of spaces as at present; and residential uses. This would be conditional upon the replacement of Crown Pools elsewhere within IP-One.
- Land at the former Civic Centre, Westgate primarily for convenience (food) retailing and some comparison retailing, plus some residential, office or leisure development.

Several other sites were suggested, but none were considered to provide a better option than the locations selected. Another option was to not allocate any sites for new retail development.

#### Policy Area 61: Environmental Improvements

The Council proposes to ensure that environmental improvements are provided through redevelopment opportunities as identified in the Opportunity Area Studies. The development objectives and development principles set out for each of the twelve areas set out what the Council would like to see happen.

Examples include improved permeability for pedestrians so that people can walk easily from the eastern quays to Holywells Park. This involves opening up access on the western side of the park and creating more routes through blocks of development that currently act as barriers. Another is improved routes for pedestrians through the Merchant Quarter to link more effectively north-south from the town centre to the Waterfront. The sketches provided with the development objectives and principles provide a picture as to how the Council's aim for each area could be achieved in terms of a layout, but they are intended to be indicative only.

In due course, more detailed master plans would be prepared where necessary to give more detailed guidance on the redevelopment of these areas or particular sites within them. This would need to be carried out with the involvement of developers and landowners.

Two alternatives were considered:

- Not focus on any specific areas within IP-One.
- To focus on the larger areas of the Waterfront, Village, etc.

#### Policy Area 62: Green Space and Play

The Council proposes to allocate land for open space (additional to the normal expectation of provision within residential developments) at:

- Orwell Quay – this would be expected to include provision for children's play and public facilities (e.g. visitor information, public toilets); and

- The Island Site (15% of the site).

The alternative considered was to not allocate any open space additional to that which would normally be required within new developments.

#### Policy Area 63: Urban Design Guidelines

The Council proposes an approach based on the following:

- Landmark buildings would be appropriate at the key gateways into the town centre to provide a sense of arrival. These are
  - St Matthew's roundabout,
  - Princes Street Bridge; and
  - The Duke Street area.

In this context, landmark building does not necessarily mean tall building, as buildings such as the Willis Faber building amply demonstrate.

- Tall buildings would be permitted only in two arcs, along the northern quays and down the Civic Drive, and height variations from them should be incremental. Silhouette would be an important criterion in assessing tall buildings;
- From the northern quays, building height should step down to the historic core;
- Strategic views should be protected – as identified in opportunity area studies; and
- Any building more than five storeys taller than those in its immediate surroundings should be subject to design panel review.

Conservation area appraisals to be prepared for the Wet Dock and Central Conservation Areas will also help to provide a context for considering applications for development in or adjacent to those areas.

The alternative considered is to not include specific guidance for landmark buildings to announce the town centre, or for tall buildings in IP-One.

#### Policy Area 64: Site for Ipswich Flood Barrier

The Council's suggested approach is to highlight the fact that a tidal surge flood barrier will be constructed during the plan period and that it is likely to be sited on the New Cut between the southern end of the Island site and Felaw Street. As a consequence, any development sites coming forward in those areas would need to accommodate the needs of the flood barrier.

The question of the optimum precise location for the tidal barrier was considered to be an issue for the Flood Defence Strategy to address. However, the other option considered, therefore, was to wait until the funding timetable has been agreed for delivery of the barrier before including any proposals.

#### Policy Area 65: Site for Town Centre Electricity Sub Station

The Council's suggested approach is to highlight the need for an extension to the existing Turret Lane sub station, or a new sub station, to be incorporated into redevelopment proposals for Turret Lane. Because of this specific requirement, a comprehensive approach to the redevelopment of land at Turret Lane would be required.

The other approach considered was to not highlight the need for a substation at Turret Lane and put the onus on EDF Energy to find a site.

## **18.2. Comparison of the social, environmental and economic effects of the options**

### Assessment methodology

The policies and their alternatives were assessed against the 22 SA objectives listed in Chapter 5 using the scoring system in Table 18.1. For each SA objective the impact on the indicators associated with them (see Appendix 1) were considered and possible direction of impact recorded.

*Table 18.1: SA scoring system*

Symbol	Effect
++	Strong positive
+	Positive
0/+	Weak positive
0	Neutral
-/0	Weak negative
-	Negative
--	Strong negative
+/-	Both positive and negative

A summary of the results can be seen in Table 18.2, whilst the full results for each policy option can be seen in Appendix 3. Appendix 3 also records any secondary, short, medium or long term effects for each policy and options. Synergistic effects have been noted with the secondary effects. The overview and summary is based on the long term effects.

#### Appraisal results

Of the 24 policy areas, the preferred policies scored the highest in 17 and the joint highest in another two. In the five other policy areas, one of the alternative options suggested was given a higher score. There were four policy areas in which one or more of the alternatives could not be scored due to lack of information or poor wording, and therefore were given a ?, with the preferred policy gaining the highest score by default. The five policy areas in which the alternative options scored more highly are dealt with below the table.

*Table 18.2: SA scores for the 24 policy areas*

Policy Area	Preferred policy	Alternative 1	Alternative 2	Alternative 3	Highest score
42	+6	-5	+7		Alternative 2
43	+6	-4			Preferred policy
44	-4.5	?			Preferred policy
45	+2.5	0	0		Preferred policy
46	+5	-5			Preferred policy
47	+4 / +4.5 / +1.5 / +3.5	0			Preferred policy
48	+4	-4			Preferred policy
49	+10	0			Preferred policy
50	+7	-5	+8		Alternative 2
51	+7	-7			Preferred policy
52	+10	0	?		Preferred policy
53	-3	0	-1		Alternative 1
54	+4	+2	-1		Preferred policy
55	+11	?			Preferred policy
56	-1	+0.5	-2		Alternative 1
57	+8	-3	+11	+6	Alternative 2
58	+1	+1	-2		Preferred / Alt. 1
59	+8	-3	+8		Preferred / Alt. 2
60	+1.5 / +1.5 / +3.5	0			Preferred policy
61	+8	?	-3		Preferred policy
62	+1.5	0			Preferred policy
63	+3	-2			Preferred policy
64	+5	-5			Preferred policy
65	-2	-3			Preferred policy

#### *Policy Area 42*

For policy area 42, the preferred option was outscored by alternative 2. However, this may be slightly misleading as it is largely because on three indicators the preferred option scored a negative (possible development in a flood risk zone and potential damage to wildlife and a conservation area), whilst for alternative 2 this was given as a ? (and therefore scored 0) because it did not specify the alternative location for the development.

#### *Policy Area 50*

For policy area 50, the preferred option was outscored by alternative 2. This was due a single issue; noise conflicts. Alternative 2 aims for higher noise standards than the building regulation requirements, and therefore greater protection for residents against anti-social neighbours. The preferred policy could be improved by including this, though as stated in the plan, only building control would be capable of enforcing it.

#### *Policy Area 53*

For policy area 53, the preferred option was outscored by alternative 1. This was because the preferred policy supports the building of extra road capacity, which scores negatively on air quality, traffic, potential damage to wildlife and conservation area and health. In contrast, alternative 1 omits the proposal for a Wet Dock crossing, and is therefore neutral.

#### *Policy Area 56*

For policy area 56, the preferred option was outscored by alternative 1. This is because it limits long-term parking more than the other two options, and may discourage people from driving in to Ipswich, which in turn may have a positive effect on traffic levels, air quality and health (if they cycle or walk instead).

#### *Policy Area 57*

For policy area 57, the preferred option was outscored by alternative 2. This is because alternative 2 involved expanding the town centre southwards towards the train station, which may enable greater accessibility to and from it.

### **18.3. Description of the significant sustainability effects**

The significant sustainability effects of the preferred options (prior to the acceptance of any recommendations for change made in section 19.5) are described in section 20.

### **18.4. Why the preferred options were chosen**

The IP-One Area Action Plan contains justifications for choosing each of the preferred options over the alternatives.

### **18.5. Any proposed mitigation measures**

Even in cases where their scores were positive overall, most of the preferred policies still had negative scores on one or more sustainability indicators. However, in many cases, these negative impacts are mitigated by the existence of other policies intended to be used in parallel or it is possible to remove or mitigate possible negative impacts by changes to wording. In some cases where it is not possible to mitigate a negative effect, monitoring is necessary to check if it actually occurs and to enable action to be planned to deal with at a later date. These measures are detailed below on a policy-by-policy basis. If a policy is missing, this means that there were no negative impacts.

#### *Policy Area 42*

The preferred option for policy area 42 (town centre boundary) scores negatively on four aspects; flood risk, biodiversity, Conversation Areas and land available for housing. In the first case, the policy may result in more development in a flood risk zone. This can be wholly mitigated by having no development (unrealistic) or partially mitigated by ensuring that development is flood-proofed (e.g. building flats in which the bottom floor is not inhabited, or by ensuring that houses in risk zones have waterproof plaster). The issue of wildlife and conservation areas is that they may be damaged by development in the Northern and Eastern Quays. This can be mitigated by ensuring that development is carried out carefully, (if possible) takes place at a time of year when wildlife will be least affected, and is designed to good standards. The fact that the amount of land available for housing is not possible to mitigate, though it should be noted that if Ipswich is to expand in a sustainable manner, the town centre will need to expand as well.

#### *Policy Area 43*

The preferred option for policy area 43 (allocations for employment use) scores negatively on several aspects; air quality, waste, carbon emissions, flood risk, biodiversity, conservation areas, and health. Regarding air quality, some of the allocated sites are within AQMAs, which can be mitigated by ensuring that developers encourage sustainable transport and reduce the amount of traffic in the area. Waste and carbon emissions can also be mitigated by ensuring good design standards (e.g. energy efficiency, space for recycling facilities) and by forcing developers to produce a waste plan and/or generate a certain proportion of the development's energy needs through renewable means. There are also health concerns regarding development on landfill sites, which can be mitigated by ensuring good ventilation in any developments to prevent a build-up of methane, as well as monitoring for noxious substances and subsidence. This could be picked up in PA 50 Design and Amenity in the town centre. Development which affects biodiversity, conservation areas, and is in flood risk zones can be mitigated by the measures mentioned under policy area 42.

#### *Policy Area 44*

The preferred option for policy area 44 (hotels) scores negatively on several aspects; air quality, waste, traffic, carbon emissions, flood risk and archaeological sites. Mitigation measures for most of these are covered under the two previous policies. For archaeological sites, mitigation is possible through rescue archaeology and careful development which avoids destroying the site. Reducing traffic is much more difficult in this instance, as hotels will be catering almost exclusively for people from outside the town. Nevertheless, ensuring that those sites have good public transport links (i.e. to the railway station) may mean that more people will arrive by train.

#### *Policy Area 45*

The preferred option for policy area 45 (leisure developments) scores negatively on three aspects; waste, carbon emissions and flood risk. All are covered above.

#### *Policy Area 46*

The preferred option for policy area 46 (protecting existing employment areas) scores negatively on one aspect; housing. There is a concern that preventing employment areas from being converted to housing use may limit the amount of housing which can be built. Whilst this can be mitigated by lifting the restrictions, there is also a clear need for employment areas, and therefore the negative impact of limiting housing development is necessary in order to not also limit the number of jobs.

#### *Policy Area 47*

The preferred option for policy area 47 (residential and residential-led mixed-use developments) scores negatively on several aspects; waste, traffic, carbon emissions, flood risk, biodiversity and archaeological sites. Mitigation measures for these issues are dealt with above, but for transport, there is the additional measure of ensuring storage space for cycles and quality pedestrian and cycling facilities in such developments in order to reduce traffic. The latter could be covered in PA 50 Design and Amenity in the town centre.

#### *Policy Area 50*

The preferred option for policy area 50 (design and amenity in town centre living) scores negatively on one aspect; reducing contributions to climate change. This is because the policy encourages the use of roofspace for private outdoor space. This means that the roof cannot be used for renewable energy generation, i.e. solar panels. This could be mitigated by ensuring that the buildings have other ways of generating renewable energy and/or have high standards of efficiency (e.g. a CHP system).

#### *Policy Area 53*

The preferred option for policy area 53 (Wet Dock crossing) scores negatively on multiple aspects; air quality, traffic, biodiversity, conservation area, townscape and health. Whilst some of these can be mitigated by measures mentioned above (i.e. biodiversity, conservation area and townscape),

the impacts on traffic (which will almost certainly increase), air quality (which is likely to worsen if traffic increases) and health (which may be affected by worsened air quality and possible encouragement for people to drive rather than walk or cycle) are very difficult to mitigate. This may be done to some extent if changes are made in the Star Lane area (i.e. reducing capacity there) as a consequence of the Crossing being developed.

#### *Policy Area 54*

The preferred option for policy area 54 (Star Lane and College Street gyratory) scores negatively on three aspects; economic growth, the town centre and encouraging investment. This is because reducing road capacity in the area may increase congestion and make the area less attractive. This is mitigated by encouraging the use of sustainable transport, encapsulated in a strategic way in PA 52 Cycle and pedestrian routes and PA55 Public transport routes, which may reduce the amount of traffic using the road and relieve congestion.

#### *Policy Area 56*

The preferred option for policy area 56 (parking strategy) scores negatively on three related aspects; air quality, traffic and health. This is because it aims to increase the amount of parking in the town centre, which may encourage more people to drive rather than use public transport, walk or cycle. This can be mitigated by either encouraging the use of sustainable modes (see above), or by raising car parking charges to a level at which it is more expensive to park a car than for a family to travel the town centre travel by bus.

#### *Policy Area 60*

The preferred option for policy area 60 (Site allocations for new retail development) scores negatively on several aspects; air quality, waste, traffic, greenhouse gas emissions, biodiversity and archaeological sites. These are all possible negative effects of new developments. Mitigation measures for all these issues are described above.

#### *Policy Area 62*

The preferred option for policy area 62 (green space and play) scores negatively on four aspects; employment, housing, economic growth and inward investment. This is because it proposes allocating land in development for green space, which means that less area is available for development. However, whilst this can be mitigated by allocating less space for green/play use, the benefits of allocating green and/or play space outweigh the negatives.

#### *Policy Area 64*

The preferred option for policy area 64 (site for Ipswich flood barrier) scores negatively on two aspects; biodiversity and conservation areas. This is because building a flood barrier may damage the River Orwell wildlife site and the Wet Dock conservation area. However, this is mitigated through careful construction (methods and timing) and sympathetic design as covered in PA 50..

#### *Policy Area 65*

The preferred option for policy area 65 (site for town centre electricity sub station) scores negatively on four aspects; energy use, flood risk, conservation area and townscape. This is because a new sub-station may result in increased electricity usage, will be in a flood risk zone (meaning that a flood may result in power cuts), and may damage a conservation area and the townscape. The first impact may be mitigated by encouraging energy efficiency and the use of renewable energy. Potential damage to the conservation area and townscape can be mitigated by careful design and is covered by PA 50. Flood risk is more difficult to mitigate, but it may be possible to flood proof the site through infrastructure that allows barriers to be installed at short-notice during high-risk times.

## 19. Likely significant effects of the plan

### 19.1. Significant social, environmental and economic effects of the preferred policies

The significant effects of the 24 preferred policies are summarised in Table 19.1 overleaf. The final column shows the combined impact on the 22 sustainability indicators of the preferred policies. For the most part the overall effect is positive, with the greatest effects anticipated for encouraging jobs and efficient patterns of movement to support economic growth. There are a few issues.

The combined effect of the IP-One Area Action plan is negative for five of the 22 SA indicators. All related to new development, these are:

- ET3 - Reducing waste: New development may lead to an increase in waste produced in the borough.
- ET6 - Reduce contributions to climate change: New development may lead to an increase in the amount of energy consumed in the borough.
- ET7 - Flood risk: Several of the proposed developments are in the flood risk zone.
- ET8 - Biodiversity: Several of the proposed developments affect wildlife sites.
- ET9 - Sites of historical importance: Several of the proposed developments affect conservation areas and/or archaeological sites.

Of these, ET3, ET6 and ET8 have no positive correlations on any of the 24 preferred policies. This is a concerning omission and means that there is no mitigation built into the IP-One Area Action plan. However this plan does not stand in isolation to the Core Strategy. If the Core Strategy provides adequate mitigation for these aspects then the IP-One Area Action Plan should be appropriately sustainable.

Another concern is that the overall impact on ET11 (SSSIs, SPAs and SACs) is neutral, as it has no positives or negatives. However, this is because there are no sites of this nature in the area covered by the IP-One Area Action Plan. Nevertheless, there may be secondary effects on sites outside the area, as noted in section 20.1.2.

Whilst they scored positively overall, a significant number of policies recorded possible negative effects for conserving sites of historical importance (9), traffic (8) and biodiversity (8). This suggests that the plan lacks a clear statement encouraging protection of sites of historical or biodiversity importance and the use of sustainable modes of transport. Other concerns regard greenhouse gas emissions (7 negatives), air quality (6) and flood risk (6).

In contrast, there were six indicators for which none of the 24 policies recorded a negative score; conserving soil resources, improving access to key services, protecting SSSIs, SPAs and SACs, improving the quality of where people live, reducing poverty, improving education and skills, and to minimise crime and anti-social behaviour. Although some of these did not score particularly highly overall it is good that these aspects will benefit from the implementation of the plan.

Table 19.1: Sustainability appraisal of the IP-One Area Action Plan preferred policies

	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	T
ET1. To improve water and air quality	+	-/0	-	0	+	0/+	0	+	+	+	++	-	+	++	-	+	0	+	-	+/-	0	0	0	0	8
ET2. To conserve soil resources and quality	+	++	0	+	0	+	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	6
ET3. To reduce waste	0	-	-	-	0	--	0	0	+	0	0	0	0	0	0	0	0	0	-	0	0	0	0	0	-5
ET4. To reduce the effects of traffic upon the environment	+	-/0	-/0	-	+	-	0	+	+	+	++	-	+	++	-	+	0	+	--	+/-	0	0	0	0	5
ET5. To improve access to key services for all sectors of the population	0	0	0	0	0	++	0	+	0	+	++	0	+	++	?	0	0	+	+	0	0	0	0	0	11
ET6. To reduce contributions to climate change	0	-	-	-	0	-/0	0	0	-	0	0	0	0	0	0	0	0	0	-	0	0	0	0	-	-6.5
ET7. To reduce vulnerability to climatic events and increasing sea levels	-	--	--	--	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	++	--	-7
ET8. To conserve and enhance biodiversity	-	-	-	-	0	-	0	0	0	0	0	-	0	0	0	0	0	0	-	0	0	0	-	0	-8
ET9. To conserve and where appropriate enhance areas and sites of historical importance	-	-	-	-	0	-/0	+	0	0	0	0	-	+	0	0	0	0	0	-	+	0	+	-	-	-4.5
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0	0/+	0/+	0/+	0	0	0	0	0	0	0	-	0	0	0	0	0	0	0	+	+	+	0	-	2.5
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
HW1. To improve the health of those most in need	0	-	0	+	0	++	0	+	+	+	++	-	+	0	-	+	0	+	0	++	+	0	0	0	11
HW2. To improve the quality of life where people live and encourage community participation	0	+	0	+	0	0	+	+	+	0	0	+	+	0	0	0	0	0	0/+	+	+	0	+	0	10.5
ER1. To reduce poverty and social exclusion	+	++	0/+	++	0	0	0	0	0	+	0	0	0	+	0	0	0	0	0	0	0	0	0	0	7.5
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+	++	0/+	+	+	0	+	+	0	+	0	+	0	0	0	+	0	+	+	0	-/0	0	+	+	14
ER3. To help meet the housing requirements for the whole community	-	0	0	0	-	++	0	0	+	0	0	0	0	0	0	0	0	0	0	0	-/0	0	+	0	1.5
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+	++	0/+	0	+	0	+	+	0	0	0	+	-	0	0	+	0	+	+	0	-/0	0	+	+	11
ER5. To revitalise town centres	+	++	+	+	0	0/+	0	0	0	0	0	0	-	+	+	+	+	0	++	0	0	0	0	0	10.5
ER6. To encourage efficient patterns of movement in support of economic growth	+	+	0	+	+	0	0	+	+	+	++	-	+	++	-	+	0	+	+	+/-	0	0	0	0	13
ER7. To encourage and accommodate both indigenous and inward investment	+	+	0	0	+	0	0	0	0	0	0	+	-	0	+	+	0	+	++	+	-/0	+	+	+	11.5
CL1. To maintain and improve access to education and skills for both young people and adults	+	0/+	0	0	0	++	0	+	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	5.5
CD1. To minimise potential opportunities for crime and anti-social activity	0	0	0	+	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	4
Total	6	6	-5	2.5	5	4	4	10	7	7	10	-3	4	11	-1	8	1	8	1.5	8	1	3	5	-2	102.5



### **19.1.1. Short, medium and long term**

The assessment of the policies suggested that in several cases, there would be different effects in the short-, medium- and long-term. These are listed below:

#### Employment

In policies advocating development, it is likely that in the short-term there would be a large number of construction jobs created. This requires planning for dealing with a possible influx of construction workers, many of whom may be migrant workers.

#### Transport

The effects of the suggestions for a Wet Dock crossing are likely to be only in the long term, as it would not be developed for several years, and therefore have no immediate impact.

### **19.1.2. Secondary**

The assessment of the policies suggested that in several cases, there would be secondary effects. These are listed below:

#### Crime and anti-social behaviour

Several policies advocate economic growth for Ipswich. This may have a secondary effect of reducing crime and anti-social activity, as tends to occur in more economically successful areas. In contrast, policies which block development may have the opposite effect.

#### Health

Several policies advocate economic growth for Ipswich. Together with improved education levels (policy 20), this may have a secondary effect of improving the average health status of Ipswich residents, as those in employment tend to be more healthy both physically and mentally than those out of work. In contrast, policies which block development may have the opposite effect.

#### Inward investment

Under the green space policy (62) and the urban design policy (63), it is suggested that a greener or better designed environment may help to make Ipswich more attractive as an investment location.

#### Poverty

A secondary effect of the flood barrier would be that flood risk in central Ipswich would be lower, and therefore may ease the potential insurance issues of poorer residents.

#### Retail

Policies advocating an increased number of residents in Ipswich may have the secondary effect of increasing the town centre's customer base, thereby increasing its vitality.

### **19.1.3. Cumulative**

The likely cumulative effect of this plan is to offer a greater range of jobs with efficient patterns of movement to support this economic growth. This is likely to be associated with indigenous and inward investment and revitalisation of the town centre. There is likely to be a strong positive correlation between these aspects of sustainability and improving the health of the population. It is good that the SA also suggests that the cumulative effect of the policies will also help improve the quality of life of people living in the area.

The negative cumulative effects are similar to issues picked up in the Core Strategy although biodiversity is a greater concern in IP-One. It is little mentioned in the policies and relies on the Core Strategy policy of protecting assets. There is a need for sites to be assessed for biodiversity potential although it is recognised that the likelihood of protected species is more limited in the busy, bustling town centre environment. However it could be an issue with long derelict dockside buildings so it cannot be dismissed. Flooding is a higher risk as the plan covers central Ipswich

where the flood concerns are the greatest. The positive cumulative impacts described above assume that the flood concern is mitigated, by the development of the flood barrier and short term design mitigation. SA objective ET9 dealing with protection of historic interest also appears to have a low negative cumulative effect but this is mitigated by PA 61 Environmental improvements and PA63 Urban design.

#### **19.1.4. Synergistic**

Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects can occur as habitats, resources or human communities get close to capacity. Possible synergistic effects in this plan could occur from the level of commercial development making more sophisticated recycling schemes possible. In a sense this is planned for and anticipated in Core Strategy 19 that seek to establish non residential planning gain tariffs.

#### **19.1.5. Permanent and temporary**

There are two main temporary effects of the preferred options. The first of these relates to construction; as a significant amount of development is planned, this will result in the need for more construction workers in the area. This may result in an influx of migrant workers, which may affect community relations. The workers will require housing, though only until the construction has ended.

A specific temporary effect of policy area 23 (strategic flood defence) is that until the tidal surge barrier is completed, flood risk will remain at its present level, or possibly worse due to the effects of climate change. In the long-term, risk should be significantly reduced by a barrier.

## **20. REPORTS ON POLICY COVERAGE**

### **20.1. Range of policies in the plan document**

In the document itself it is noted that the borough council believes that an area action plan is needed for central Ipswich because it is the focus for urban renaissance in the borough between now and 2021. As such, it is the part of Ipswich where most development activity and change is likely to take place, whether it is associated with helping to make the new University Campus Suffolk a reality, enhancing shopping in the town centre, or creating places where people can adopt sustainable lifestyles, living and working close to all the central amenities.

Central Ipswich performs an important role for Ipswich residents and for many people over a wider area in providing the focus for work, shopping, higher and further education, leisure, recreation, culture and civic life. Because of this, the plan aims to ensure that appropriate land allocations and policies are in place, together with a firm delivery plan, to ensure that the development needed happens in an appropriate and sustainable way.

## **21. LIST AND DESCRIPTION OF THE MITIGATION MEASURES**

### **21.1. Changes to the plan resulting from the SA process**

The cumulative effect of the IP-One Area Action Plan has highlighted weaknesses in terms of its possible impact on sustainability aspects relating to biodiversity, reduction of waste and energy conservation. These are areas that are not mitigated by other policies in the plan and we have seen that these are not well covered in the Core Strategy itself. The recommendation is that the Core Strategy be strengthened and that the need to consider biodiversity potential of IP-One sites is mentioned/cross referenced in PA 61 Environmental Improvements.

Issues of waste and energy minimisation need to be covered in Core Strategy policies and need to be included in policies promoting sustainable construction. The latter could be made clearer in policies covering urban design in the Core Strategy and IP-One Plan.

Concerns picked up in the appraisal of PA 43 allocations for employment including development on landfill sites and provision of storage space for cyclists could be mitigated by covering the need for careful planning on such sites in PA 50 Design and amenity in the town centre.

### **21.2. Proposed mitigation measures**

Section 21.1 deals with the mitigation measures involving policy wording. It has already been noted in section 18.5 that many of the sustainability aspects raised are in fact mitigated by the existence of other policies that will be acting in parallel with the specific policy.

One outstanding concern is the impact on biodiversity because relatively little is known about what is in the IP-one area. The SA framework includes an indicator ET8c that looks at the extent and condition of key habitats for which BAPs have been established. It is recommended that what is within the IP-one area is identified and monitored.

### **21.3. Uncertainties and risks**

Several of the alternatives mentioned in the plan did not have sufficient details to enable an appraisal of their effect to be undertaken. These have been recorded as uncertainties in addition to circumstances where the appraisal is so complicated that the direction of an impact cannot be made, although it is thought it might have an impact. Table 19.1 only shows one area of uncertainty which is good because it means that on the whole policy areas are clear in what they are intending and outcomes relate well to the SA objectives. Some effects are recorded as being + or - because they are summarising composite situations that could go either way depending on what is implemented on the ground. This is not the same as there being uncertainty about the impact. Where there are uncertainties, monitoring is required to check that an undesirable negative impact is not occurring and if it is mitigation action can be taken.

Policy Area 56 show an uncertain effect because there is no provision for parking associated with the new University. Indicators included in the SA Framework will monitor the use of sustainable transport but it is recommended that the availability of parking spaces is monitored. If there are too few spaces available in the town it could deter people trying to balance child care and employment with accessing further education.

## **22. MONITORING MEASURES**

### **22.1. Links to other tiers of plans and programmes and the project level**

The plans with the closest link to the IP-One Area Action Plan are the Core Strategy and Site Allocations and Policies. The IP-One Area Action Plan is intended to be implemented alongside the Core Strategy and the sustainability of IP-One is therefore partly dependent on the robustness of the Core Strategy. The Site Allocations and Policies DPD repeats site specific policy that has been included in the IP-One Plan whilst showing it in its wider context.

### **22.2. Proposals for monitoring**

One new indicator is proposed for monitoring: Parking spaces. This should look at the take up of spaces during the week day to ensure that there is not a shortfall in the area of the University. If car parks appeared to be at capacity then specific research would be needed to check that access to higher education was not being curtailed through lack of ability to use private cars in particular circumstances. Clearly the emphasis would be on the provision of sustainable transport facilities but nevertheless child care and employment commitments might disadvantage those that were unable to use a car.

## 23. QUALITY ASSURANCE CHECKLIST

The checklist below is intended to help test whether the requirements of the SEA Directive are met, and show how effectively the SEA has integrated environmental considerations into the plan-making process. It covers both the technical elements of the SEA and the procedural steps of the SEA process under the Directive.

Quality Assurance checklist	Located in
<b>Objectives and context</b> <ul style="list-style-type: none"> <li>• The plan's or programme's purpose and objectives are made clear.</li> <li>• Environmental issues and constraints, including international and EC environmental protection objectives, are considered in developing objectives and targets.</li> <li>• SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate.</li> <li>• Links with other related plans, programmes and policies are identified and explained.</li> <li>• Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described.</li> </ul>	<p>Chapter 6, 12 , 17 Scoping report</p> <p>Section 5.3</p> <p>Appendix 2</p> <p>Scoping report, Sections 6.6, 12.6, 17.6</p>
<b>Scoping</b> <ul style="list-style-type: none"> <li>• Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report.</li> <li>• The assessment focuses on significant issues.</li> <li>• Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.</li> <li>• Reasons are given for eliminating issues from further consideration.</li> </ul>	<p>Scoping report</p> <p>Section 4.3 Scoping report</p> <p>Scoping report</p>
<b>Alternatives</b> <ul style="list-style-type: none"> <li>• Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.</li> <li>• Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant.</li> <li>• The environmental effects (both adverse and beneficial) of each alternative are identified and compared.</li> <li>• Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.</li> <li>• Reasons are given for selection or elimination of alternatives.</li> </ul>	<p>Chapters 7, 13, 18</p> <p>Chapters 7, 13, 18</p> <p>Sections 7.2, 13.2, 18.2</p> <p>Sections 7.3, 13.3, 18.3</p> <p>Sections 7.4, 13.4, 18.4</p>
<b>Baseline information</b> <ul style="list-style-type: none"> <li>• Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described.</li> <li>• Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan.</li> <li>• Difficulties such as deficiencies in information or methods are explained.</li> </ul>	<p>Chapter 4</p> <p>Chapter 4</p> <p>Chapter 4</p>
<b>Prediction and evaluation of likely significant environmental effects</b> <ul style="list-style-type: none"> <li>• Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate.</li> <li>• Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed.</li> <li>• Likely secondary, cumulative and synergistic effects are identified where practicable.</li> <li>• Inter-relationships between effects are considered where practicable.</li> </ul>	<p>Sections 7.3, 13.3, 18.3</p> <p>Appendix 5</p> <p>Appendix 5</p> <p>Appendix 5</p>

<ul style="list-style-type: none"> <li>• The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds.</li> <li>• Methods used to evaluate the effects are described.</li> </ul>	<p>Appendix 3</p> <p>Sections 7.2, 13.2, 18.2</p>
<p>Mitigation measures</p> <ul style="list-style-type: none"> <li>• Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.</li> <li>• Issues to be taken into account in project consents are identified.</li> </ul>	<p>Sections 7.5, 13.5, 18.5, Chapters 10, 15, 21</p> <p>Section 3.8</p>
<p>The Environmental Report</p> <ul style="list-style-type: none"> <li>• Is clear and concise in its layout and presentation.</li> <li>• Uses simple, clear language and avoids or explains technical terms.</li> <li>• Uses maps and other illustrations where appropriate.</li> <li>• Explains the methodology used.</li> <li>• Explains who was consulted and what methods of consultation were used.</li> <li>• Identifies sources of information, including expert judgement and matters of opinion.</li> <li>• Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA.</li> </ul>	<p>Contents</p> <p>Throughout</p> <p>Figures</p> <p>Chapter 3</p> <p>Section 3.4</p> <p>Appendix 3</p> <p>Section 1.1</p>
<p>Consultation</p> <ul style="list-style-type: none"> <li>• The SEA is consulted on as an integral part of the plan-making process.</li> <li>• Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report.</li> </ul>	
<p>Decision-making and information on the decision</p> <ul style="list-style-type: none"> <li>• The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme.</li> <li>• An explanation is given of how they have been taken into account.</li> <li>• Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.</li> </ul>	
<p>Monitoring measures</p> <ul style="list-style-type: none"> <li>• Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.</li> <li>• Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.</li> <li>• Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)</li> <li>• Proposals are made for action in response to significant adverse effects.</li> </ul>	

## **24. BIBLIOGRAPHY**

A practical guide to the Strategic Environmental Assessment Directive (ODPM, September 2005)

European Union Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes regulations 2004

East of England Regional Spatial Strategy Habitat Directive Assessment (ERM, December 2006)

Scoping report (Suffolk Sustainability Appraisal Group, 2006)

Suffolk, Creating the Greenest County (Suffolk County Council Cabinet Report, 6 March 2007)

Suffolk's Environment monitoring reports (Suffolk Sustainability Appraisal Group, 2001-5)

Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (DCLG, November 2005)

Sustainability Baseline Data (Suffolk Sustainability Appraisal Group, 2006)

Sustainability Framework (Suffolk Sustainability Appraisal Group, 2005)



## 25. GLOSSARY

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BREEAM	Building Research Establishment Environmental Assessment Method
CA	Conservation Area
CWS	County Wildlife Site
LNR	Local Nature Reserve
NEET	Not in Education, Employment or Training
NERC	Natural Environment and Rural Communities
PCT	Primary Care Trust
PDL	Previously Developed Land
PPS	Planning Policy Statement
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAM	Scheduled Ancient Monument
SEA	Strategic Environmental Assessment
SLA	Special Landscape Area
SOA	Super Output Area
SOR	School Organisation Review
SPA	Special Protection Area
SSAG	Suffolk Sustainability Appraisal Group
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage System

**SECTION F**

**APPENDICES**

## Appendix 1: Changes to the preferred option resulting from the Issues & Options SA

Document	Issue (from Issues & Options Stage)	Conclusions from SA Process	Where taken up in Preferred Options docs	Commentary
Core Strategy	Issue 1: The Vision for Ipswich	<p>Option 4 appears to have the most clear positive likely impacts. Strongly positive impacts are likely to be in relation to traffic impact and efficiency of movement, on climate change and on flood risk. Other positive impacts include air quality, soil resources, waste reduction, access to services and education, protection of species, health, quality of life, balanced delivery of housing and the town centre viability and vibrancy.</p> <p>However, this is based on an assumption of what 'sustainable' means. This would need to be clarified in supporting text and objectives for the Vision. Strong consideration should be given to the outcome of the sustainability appraisal exercise to ensure that <u>all</u> relevant factors are taken into account in the preparation of planning policies to ensure that the growth of Ipswich takes place with all sustainability considerations in mind.</p>	Core: The Vision & Objectives. Policy Area 1 (The Approach to sustainable development) & 4 (The approach to protecting our assets)	<p>The Vision proposed within the Preferred Options documents (page 19) includes the phraseology within option 4.</p> <p>It is considered that the guiding principles and objectives start to set out what sustainable means in the Ipswich context.</p>
Core Strategy	Issue 2 : The Approach to the Location of Development	<p>Overall, Options 1 and 2 appear to provide the most appropriate overall approach towards the location of growth. This would have the potential to deliver an overall framework for strategically integrated, managed growth by:</p> <ul style="list-style-type: none"> <li>- Supporting sustainable transport by concentrating development in sustainable locations and providing critical masses to support improved public transport/ cycle routes, etc;</li> <li>- Facilitating good access to a range of services and facilities: focused growth could enable strategic management of uses to ensure balanced communities and the reduced need to travel at the neighbourhood level;</li> <li>- Focusing economic development in the most viable locations;</li> <li>- Providing the most effective framework for securing both public and private investment; and</li> <li>- Providing the critical mass and strategic direction to the delivery of infrastructure;</li> </ul>	Core: Policy Areas 2 (Approach to location of development)	<p>The Preferred Options basically take forwards options 1 and 2 with the guiding principles on page 19, the objectives on page 23 and Policy Area 2 on page 30.</p> <p>Whilst the basics principles have been followed throughout the document in some areas this has been built on further. For instance, in terms of housing this has been enhanced within Policy Area 9 which sets density based locational guidance.</p> <p>Finally in the context of flooding the importance of the delivery of a major flood protection scheme for the town is prominent within the Core Strategy (e.g. Policy Area 23). A number of</p>

		<p>However, relevant considerations vary according to different use types.</p> <p><b>Housing</b> It would appear that all three options have a role to play in this. This appraisal has shown the positive impacts from locating housing in the town centre and in key locations.</p> <p>Options 1 and 2 would contribute to urban renaissance, to the delivery of growth that is sustainable in terms of reducing the need to travel, especially by car, in providing a strategic approach to infrastructure delivery, services, in the promotion of civic pride at Borough and neighbourhood levels, and in focusing development in areas that need regeneration.</p> <p>However, Option 3 could also make a significant additional contribution (given the regional housing target and urban capacity constraints), based on three assumptions: (1) sites would undergo sustainability appraisal; (2) unlike employment uses (the other area with a growth target leading delivery), housing is likely to come forward on most sites automatically if allocated for that use; and (3) any development would make appropriate contributions to the services that they affect.</p> <p>The issue of housing in the town centre is a key issue of tension in the Appraisal and is therefore addressed separately below.</p> <p><b>Employment</b> Options 1 and 2 would be most appropriate for the concentration of development. This is because of the need to focus growth in likely areas of employment growth (and investment) and to ensure sustainable and efficient travel patterns.</p> <p><b>Retail</b> Options 1 and 2, with careful consideration of the provisions set out in PPS6.</p> <p><b>Office</b> Option 1 has been shown in this appraisal to be the most appropriate for this.</p> <p><b>Industrial</b> Option 2 has been shown to be the most appropriate for this. In selecting the location of such uses, special consideration</p>	<p>Core: Policy Areas 2 (Approach to location of development)</p> <p>Core: Policy Areas 2 (Approach to location of development), Policy Area 16 Implications for different employment sectors</p> <p>Core: Policy Area 18 Approach to retail development</p> <p>Core: Policy Area 16 Implications for different employment sectors</p>	<p>sites within the flood-plain are allocated for housing within the sites allocations documents but are linked to the delivery of the flood barrier.</p> <p>To not allocate any such sites within the floodplain would arguably be leaving substantial areas of central previously developed land blighted and resulting in substantial developments in less central and / or Greenfield sites.</p>
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		<p>should be given to the issue of impact on SSSIs; other designated wildlife areas; and water quality.</p> <p><b>Leisure</b>  Option 1 has been shown to be the most appropriate location for this in terms of leisure uses that are at a Borough level (i.e. that generate a large number of visits and that are of a more than local nature). However, Option 2 (and where a need is identified, 3) could make a contribution in terms of the delivery of leisure uses that serve neighbourhoods <u>and</u> that require large amounts of land.</p> <p><b>Special Issue: Housing and Flood Risk</b>  There are key sustainability benefits in locating housing in the town centre. These are:</p> <ul style="list-style-type: none"> <li>- Meeting housing targets;</li> <li>- Conservation of greenfield land and areas of wildlife value;</li> <li>- Revitalising the town centre/ contributing to urban renaissance;</li> <li>- Reducing the environmental impact of the car, as well as congestion;</li> <li>- Reducing contributions to climate change;</li> <li>- Securing investment;</li> <li>- Quality of life (across the Borough);</li> <li>- Access to services;</li> <li>- Improving townscapes and areas of historic interest;</li> <li>- Promoting healthy lifestyles;</li> </ul> <p>Much of central Ipswich is Flood Zone 3. PPS25 states that 'more vulnerable' uses including housing are incompatible with Flood Zone 3 and thus should only be allocated to such zones if: a) the site in question is on Brownfield land; b) the allocation would contribute to sustainable communities objectives ; and c) development would be safe.</p> <p>This sustainability appraisal has shown that Option 1 would contribute to the development of brownfield land (all possible development in the town centre would be on brownfield land). Sustainability appraisal has also shown that there are a large number of likely positive sustainability impacts in relation to Option 1/ housing, including strongly positive ones. It has also shown that (aside from flood risk) there are no likely negative sustainability impacts from Option 1.</p> <p>The key issue in sustainability terms is therefore if housing developments (and their residents) would be safe.</p> <p>If option 1 for housing were considered appropriate, 2 possible</p>	<p>Core: Policy Area 16 Implications for different employment sectors, 17 Approach to Strategic Employment Site</p> <p>Core: Policy Areas 2 (Approach to location of development), Policy Area 22 (Approach to open space)</p> <p>Core: Policy Area 29 Flooding &amp; sustainable urban drainage</p>	
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		<p>options to mitigate against this issues are: Allocate housing in central Ipswich only to locations in the town centre that are <u>outside of flood zone 3</u>; and</p> <p>Only allocate sites within Flood Zone 3 that have been shown to be safe through a Strategic Flood Risk Assessment. Policies should set out requirements for site specific Flood Risk Assessments to ensure that individual planning applications for housing (and other) development have taken into account an sufficiently mitigated against flood risk.</p> <hr/>		
Core Strategy	Issue 3: Density of Residential Development (Houses Vs Flats)	<p><b>Option 1</b> Option 1 is likely to have strongly positive impacts in terms of soil conservation (brownfield development) and access to services. It could also have positive impacts in terms of protecting wildlife/ biodiversity; promoting healthy lifestyles; access to education and reducing the fear of crime. It could have negative impacts on sites of historic interest and landscapes and townscapes, on quality of life, on the town centre, and in terms of the need to meet the housing requirements of the whole community.</p> <p><b>Option 2</b> The main benefit of option 2 is in the improvement of quality of life. Likely negative impacts include impact of traffic on the environment and congestion; access to services; impact on biodiversity and designated sites, and on the need to meet the housing needs of the whole population. The option is likely to have strongly negative impacts on soil resources (due to the increased likely need to develop open/ green land).</p> <p><b>Option 3</b> Option 3 is likely to have strongly positive impacts in terms of</p>		<p>The Preferred Option chosen (Policy Area 8) is that a balance of units is needed which largely reflects option 3.</p> <p>The Strategic Housing Market Assessment will inform the submission version of the Core Strategy when it is completed.</p>

		<p>meeting the housing needs of the whole population and in promoting the town centre. It is also likely to have positive impacts in terms of reducing the environmental impact of traffic and congestion, on access to services, quality of life, and on crime reduction.</p> <p><b>Option 4</b> The impact of Option 4 is unclear. Although it promotes a balance of housing types, it does not provide any guidance as to the manner of this balance. It is therefore difficult to predict the effect on SA objectives. However, the option is likely to have a strongly positive impact in terms of meeting the housing needs of the whole community, and in terms of promoting quality of life.</p> <p>Options 1 and 2 are seen as less sustainable options because they fail to provide balance or flexibility. Option 3 appears the most sustainable as it reflects differing needs whilst promoting focused, dense development in the centre of the town.</p>	Core : Policy Area 8 (balance between flats and houses)	
Core Strategy	Issue 3 contd: Density Targets	<p>Option 1 has a number of likely positive impacts: reducing land take/ use of soil, reducing the environmental impact of traffic/ congestion; access to services and to education through sustainable means; reduced impact on biodiversity and important designated wildlife sites; meeting a variety of housing needs; protecting and promoting the town centre and (indirectly) reducing the fear of crime. This is because it sets out a balance of density types, whilst providing a minimum level that precludes unnecessarily low-density development.</p> <p>Option 2 has a number of likely positive and negative impacts. The options could have positive impacts in terms of avoiding greenfield development, avoiding the loss of wildlife and a harmful impact on important designated wildlife sites, in terms of access to services and education, health and in meeting a variety of housing needs. The option could have a negative impact on historic sites/areas and townscapes/ landscapes due to the risk of overdevelopment.</p> <p>Option 2 is likely to have both negative and positive impact in terms of vulnerability to climate change: higher densities would enable more options in terms of mitigation against flood risk (for example by placing residential units above other ground floor units), but could also place more people in flood risk areas, and also add to the heat island effect. The upper density levels proposed by Option 2 could also have a strongly positive impact on traffic, access to services and crime, however the lower levels proposed could also have a negative</p>		The Council has effectively chosen to use a methodology based on experience in Ipswich but one which builds on, rather than contradicts national policy.

		<p>effect on these same objectives.</p> <p>The above appraisal has suggested a number of possible changes that could integrate the two options. This change could take advantage of the consistent positive impact of option 1, and the very positive impacts of Option 2, but also remove some of the negative impacts of Option 2. These are:</p> <ul style="list-style-type: none"> <li>• Retain the low-density level proposed in Option 1 (i.e. raise the minimum provided by the Low Density level in Option 2)</li> <li>• Provide more medium and high density levels to enable a more flexible approach: i.e. medium-low; medium-high, high density and very high density.</li> <li>• As part of this, possibly create density typologies for the town to reflect the different character areas (i.e. broad neighbourhood types, town centre, Waterfront).</li> </ul> <p>These changes would:</p> <ul style="list-style-type: none"> <li>- reduce the negative impact of the low densities of Option 2 in terms of traffic/ the environment; access to services/ education; and crime;</li> <li>- reduce the negative impact of the highest densities of option 2 (medium and high densities) terms of inappropriate development affecting historic areas and townscapes/ landscapes</li> <li>- ensure appropriate development across the town</li> <li>- address the very broad range of densities in Option 2 that appears to fail to give clear guidance on densities.</li> </ul>	Core: Policy Area 9 (density of residential development)	
Core Strategy	Issue 4: Mixed Use Developments	<p>Option 1 is likely to have a strongly positive impact on quality of life and reducing crime/ anti-social behaviour. This is because it could be used to promote mixed and balanced neighbourhoods. It is also likely to have positive impact in terms of climate change, health and poverty/ social exclusion.</p> <p>Key negative effects include the failure to deliver of sustained economic growth and investment, and its impact on the town centre. It could also have a strongly negative impact on meeting housing needs by constraining delivery.</p> <p>Option 1 could have either positive or a negative impacts on employment, on access to services, on the environmental impact of climate change, and on patterns of movement in support of economic growth. It would be very important to ensure that the right mix of uses is achieved on each site.</p> <p>Option 2 is unlikely to have any significant negative effects,</p>		The Preferred Option (Policy Area 4) is effectively an enhancement of option 3.



	<p>although there are a large number of uncertain or neutral effects. Likely strongly positive outcomes include reducing contributions to climate change and on quality of life. Other likely positive impacts include reducing the impact of development on air and water quality; traffic and the environment; access to services; health; employment; economic growth and crime.</p> <p>Option 3 Of all options, Option 3 has the largest number of likely positive and strongly positive outcomes. Likely strongly positive impacts include reduced contributions to and vulnerability to climate change; health; quality of life; employment, economic growth and investment; protecting and enhancing the town centre and efficient movement in support of economic growth. Other positive impacts include impacts on air and water quality; reduced environmental impact of traffic; access to services; impact on historic area and landscapes and townscapes; poverty and social exclusion and crime.</p> <p>Option 4 This option is likely to have a strongly positive impact on meeting housing needs, as housing delivery would not be constrained by the need to provide other uses. However, the option has a number of negative impacts. Likely strongly negative impacts include traffic and congestion; contributions to climate change, impact on the town centre and crime and disorder. This option could have a negative impact on economic growth; employment and investment: this is because although it could be used to focus growth in some key employment areas, it could fail to take advantage of key mixed-use areas, such as the town centre and Waterfront.</p> <p><b>Conclusions</b> <u>Options 1 and 4 performed poorly in this appraisal: a lack of strategic, flexible focus mean that these options often fail to take advantage of the potential benefits of mixed use development.</u></p> <p><u>However, it is worth bearing in mind the strength of Option 1 in quality of life and community development terms, and the role of Option 2 in the development of some key single-use areas, particularly in relation to employment sites.</u> <u>Option 3 appears to be the option most supported by this appraisal. This is because the approach would enable a focused, strategic approach to the delivery of mixed uses. It is</u></p>		<p>Core : Policy Area 3 (Approach to mixed use development)</p>
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		<p><u>likely to focus mixed-use development where most beneficial in terms of access to facilities at a number of levels, and the reduced need to travel, whilst securing economic development.</u></p> <p><u>Option 2 also has benefits: this could also be used to ensure that particular forms of development also provide an element of mixed-use development even though they are not in key strategic locations. Where option 3 could be used on a strategic level, Option 2 could ensure that limited supporting uses are provided for major developments.</u></p>		
Core Strategy	Issue 5: The need for extra infrastructure	<p><u>This appraisal has clearly shown that Option 1 would have a large number of significant, cumulative negative impacts in environmental, social and economic terms. This appraisal has demonstrated that failure to provide additional infrastructure would not be a sustainable option.</u></p> <p>Option 2 is likely to have a number of significantly positive social, economic and environmental impacts and would be entirely necessary to ensure that the growth of Ipswich takes place in a sustainable and balanced way.</p> <p>Option 2 could have some negative impacts, notably in terms of possible impacts on greenfield land and biodiversity. Sustainability appraisal of each of the specific schemes suggested in Section 5 of the Core Strategy and Policies Issues and Options paper should be carried out to assess the benefits and disbenefits of each of the options.</p>	<p>Core: Policy Areas 23 (Strategic Flood defence), 24 (Provision of Health Services), 25 (Waterfront &amp; Town Centre Transport), 26 (The A14), 27 (Electricity Capacity)</p>	
Core Strategy	Issue 5 continued : New infrastructure	<p>In discussing 'a' – 'g', it should be stated that sustainability appraisal has not found that these options are mutually exclusive: a number of these options could be delivered together.</p> <p><b>a) New or upgraded bus stations</b> This is likely to have strong, positive impacts on the town centre, and on ensuring efficient movement in support of housing and economic growth. It could play an important part in mitigating the cumulative impact of the housing and jobs growth in Ipswich. This option is also likely to have positive impacts in terms of access to services, including health and education, to quality of life, and in addressing exclusion by increasing accessibility, including access to employment opportunities. This appraisal has shown that this option is</p>	<p>Core: Policy Areas 23 (Strategic Flood defence), 24 (Provision of Health Services), 25 (Waterfront &amp; Town Centre Transport), 26 (The A14), 27 (Electricity Capacity)</p>	<p>These issues are addressed at various different places within the Preferred Options documents and it is effectively recognised that a number of the options could be supported, delivered together or separately.</p> <p>Dealing with (a) to (g) in turn:</p> <p>(a) The Council remains supportive of improved bus station provision (see Policy Area 25);</p> <p>(b) Improving links between the</p>

		<p>likely to provide most benefits at the local level. There are no obvious negative effects and it appears to be a sustainable option.</p> <p><b>b) enhanced rail access</b> This also has a number of likely strongly positive impacts. These are in terms of helping to generate employment opportunities, promoting prosperity and growth in Ipswich, the impact of growth on the town centre, efficient movement in support of economic and housing growth, and in attracting investment. As with Option 1, it appears to be a viable option in terms of mitigating the cumulative impact of housing and jobs growth in Ipswich. Other positive options include impacts on air quality and emissions from transport, quality of life and access to education. This appraisal has shown that this option is likely to provide most benefits that relate to a broader sub-regional or even regional level. This option does not have any obvious negative effects and appears to be a sustainable option.</p> <p><b>c) better links between town centre, Ipswich Village and the Waterfront</b> This has a number of likely strongly positive impacts. These include the historic and townscape qualities of central Ipswich and the Waterfront, employment, prosperity and economic growth through an improved and more accessible central Ipswich, and enhanced vitality and vibrancy in the town centre. Other likely positive impact include traffic and the environment, access to services, quality of life, meeting housing needs, protection of soil and biodiversity, health, poverty and social exclusion, attracting investment, access to education and reducing crime.</p> <p>This could have both a positive and negative impact on efficient movement in support of economic growth. Although improved links could enhance the efficiency of movement for pedestrians and cyclists, changes could have a negative impact on traffic and congestion. This should be borne in mind in the event of this option being implemented. It is unlikely to have any other clear negative sustainability consequences.</p> <p><b>d) Orwell crossing</b> It is not clear whether this crossing would be a road or pedestrian/ cycle crossing.</p> <p>This is likely to have a strongly positive impact in terms of</p>		<p>station and other parts of central Ipswich are picked up within the objectives (number 6) and more detail provided within the IP-One Area Action Plan document;</p> <p>(c) Improving links between these areas is picked up within the objectives (number 6) and more detail provided within the IP-One Area Action Plan document;</p> <p>(d) The Council remains supportive of a Wet Dock Crossing (Policy Area 25) and there is a link between this, the development of the Island site and the possibility of significant change in the Star Lane area;</p> <p>(e) Whilst the Council acknowledges the merits of the East Bank Link Road, it concludes that it does not proposed to allocate it (Policy Area 26). The reasons include environmental concerns;</p> <p>(f) These are not actively proposed within the Core Strategy document since they would be of a more detailed local nature and would be picked up within the Local Transport Plan process;</p> <p>(g) An additional park and ride site if proposed within the Site Allocations document in the Nacton Road corridor</p>
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		<p>access to education by increasing access to the UCS from areas south and west of the Waterfront. It is also likely to have a positive impact in terms of access to services, poverty and social exclusion, housing, the town centre, efficient movement in support of economic growth (although it could increase congestion if it promotes car use), and attracting investment.</p> <p>It could have a positive or negative impact on soil resources, vulnerability to climatic events, historic and townscape quality, health and quality of life. Two issues are relevant here:</p> <ol style="list-style-type: none"> <li>1. Whether the crossing is solely for pedestrians/ cyclists, or also for vehicles. This appraisal has shown that, if the former, impacts are more likely to be positive, but if the latter, the crossing could have a negative impact in these areas.</li> <li>2. The design of the bridges. This issue would have a key impact on whether the crossing would impact negatively or positively on townscapes/historic character.</li> </ol> <p>Their could possibly have a negative impact on air and water quality if the crossing is a road (i.e. vehicle) crossing.</p>		(i.e. south-east Ipswich)
		<p><b>e) East Bank Link Road to A14</b></p> <p>This could have strongly positive impacts in terms of employment generation and prosperity/ economic growth. Possible positive impacts also include access to services and attracting investment. The option could have a strongly positive impact in terms of the quality of life of residents affected by port-related traffic in east Ipswich, but also a more general, negative effect on quality of life for those residents who use/ appreciate the country park.</p> <p>Their could have both a positive or negative impact in terms of traffic and the environment: the local environment is likely to be improved around Wherstead Road, etc, where port traffic currently travels, but the extra traffic likely to be generated by the road would have a negative effect in terms of general air pollution/ climate change emissions.</p> <p>It could have a strongly negative impact in terms of loss of soil, loss of species and habitats and impact on landscapes.</p> <p>In summary, positive impacts relate to the economy and employment, and the improvement of the local environment for residents of east Ipswich affected by port traffic. Negative impacts relate to wider environmental concerns regarding impact on the nature reserve/ park, and pollution/ climate</p>		

		<p>change impacts from traffic generation. Appropriate assessment would be appropriate to assess possible impacts on designated wildlife sites.</p>		
		<p><b>f) other more local improvements to access the Port</b></p> <p>The exact form of improvements is not clear- it is assumed that this relates to road improvements.</p> <p>This is likely to have strongly positive impacts in terms of employment and prosperity, and positive impacts in terms of efficient movement in support of economic growth and economic growth/ investment. However, it is likely to have a negative impact on water and air quality, and a strongly negative impact in terms of the impact of traffic on the environment. There could possibly also be a negative impact in terms of species/ habitats and protected areas (e.g. SSSI and RAMSAR sites) due to its location within a Country Wildlife Site and proximity to other designated areas. Regard should therefore be had to the results of appropriate assessment in relation to this.</p>		
		<p><b>g) more park &amp; ride sites</b></p> <p>This is likely to have strongly positive impacts on the town centre and on the efficiency of movement in support of economic growth. Positive impacts also include the possible enhancement of central historic areas, quality of life, access to employment and promotion of economic prosperity. Negative impacts include loss of soil and possible harm to habitats.</p> <p>This could have both positive and negative impacts on:</p> <ul style="list-style-type: none"> <li>- air and water quality and traffic and the environment. This is because it would reduce vehicle emissions within the Ipswich area but possibly promote more vehicle trips to get to the park and ride sites themselves; and</li> <li>- landscapes and townscapes: park and ride could have a negative impact on landscapes as they take up a lot of land on the periphery of towns, increasing the likelihood of paving over green space, but at the same time may improve the overall quality of the public realm within the urban area by reducing traffic.</li> </ul> <p>This option therefore has a large number of likely positive outcomes. The key likely negative impacts relate to vehicle emissions and land take.</p> <p><b>Conclusion</b></p>		

		<p>This appraisal has shown that options 'a', 'b' and 'c' are strong in sustainability terms, and have very few likely negative sustainability outcomes. 'g' also appears to have a number of likely positive impacts, although this option also has negative impacts that mean that this option appears less attractive in sustainability terms.</p> <p>The sustainability of 'd' would depend on whether it includes vehicle or just foot/ cycle access.</p> <p><u>Options 'e' and 'f' appear to have strongly negative impacts that mean that they achieve the poorest results in terms of sustainability appraisal, particularly in relation to the environment. Both options have the potential for strongly positive economic impacts. Regard should be given to the results of appropriate assessment in considering these two options.</u></p>		
Core Strategy	<b>Issue 6 : Conservation and Protection (wildlife areas and green space)</b>	<p><b>Option 1</b></p> <p>Option 1 is likely to have strongly positive impacts in terms of protecting and enhancing biodiversity, and important designated sites such as SSSIs. Other likely positive impacts include reducing protection of soil, both impact on- and vulnerability- to climate change, impact on historic sites and landscapes and quality of life. The conservative approach promoted by this option could lead to a negative impact in terms of the achievement of employment and housing.</p> <p><b>Option 2</b></p> <p>It is not clear from option 2 as to what exactly 'beneficial' means. Many of the positive impacts discussed below (marked *) are based on assumptions on what this means.</p> <p><u>Option 2 is likely to have a strongly positive impact on designated SSSIs etc because (as in Option 1) emphasis is placed on protecting these sites. Likely positive impacts include air and water quality*, reduced contributions to and vulnerability to climate change*, biodiversity*, important historic and landscape sites*, quality of life and housing and employment growth.</u></p> <p><u>This option does not appear to have any clear negative impacts. This is for two key reasons. The first is that, unlike Option 1, flexibility is built into the policy so that housing and employment growth may be able to take place where overall benefits would be achieved. The second is that the use of the</u></p>	Core: Policy Area 4 Protecting our Assets	<p>Largely the Council has concluded that protection matters can be covered by the use of national legislation and guidance and that it would not be appropriate to replicate such information within the Framework.</p> <p>However it is acknowledged that there are some local nuances to this and a policy basis is suggested within Policy Area 31.</p>

		<p><u>word 'beneficial' could be used to preclude negative sustainability effects. Those issues marked * above relate to those areas where criteria would be necessary to deliver positive impacts. However, it is important that 'beneficial effects' are clearly defined.</u></p> <p><u>It would also be useful to define exactly what 'high quality areas' are.</u></p> <p><b><u>Option 3</u></b>  <u>As with Option 2, there is a need to define 'as good as' or 'better than' more closely. Many of the positive impact are referred to below rely on careful consideration of criteria to ensure that impacts are positive (rather than negative).</u>  <u>Option 3 does not appear to have any likely strongly positive impacts as it does not provide the special protection for the most important sites as provided in Option 2. However, it is likely to have a number of positive impacts, including: air/ water quality*, contributions to and vulnerability to climate change*, biodiversity/ habitats and nationally designated sites*, quality of life, employment, housing and crime.</u></p> <p><u>As with option 2, this option does not appear to have any negative impacts because (1) it could enable appropriate development (e.g. for housing and employment) where such areas would be as good or better overall, but also (2) because this appraisal has assumed that suitable criteria will be put in place to ensure that impacts are positive, not negative.</u></p> <p><u>Options 2 and 3 could both have either a positive or a negative impact on soil resources/ quality, depending on how 'beneficial' and 'better' are defined as both could lead to more buildings on greenfield land.</u></p> <p><b><u>Option 4</u></b>  <u>Option 4 does not have any apparent strongly positive impact, although it could have positive impacts on the delivery of employment and housing by enabling more development on protected sites. Option 4 could have strongly negative impacts on biodiversity, species, habitats etc. Other negative impacts include water and air quality, soil quality/ resources, contributions to and vulnerability to climate change, historic sites and landscapes, SSSIs and other important designated sites and health.</u></p> <p><u>This option could also enable the delivery of improved access</u></p>		
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		<p><u>(notably though the delivery of an East Bank Link Road) across wildlife areas. This could have a positive impact in terms of access to services and efficiency of movement in support of economic growth, but could have a negative impact in terms of the environmental impact of traffic (as well as the other negative impacts listed above).</u></p> <p><u>This option appears to achieve poor results in relation to sustainability because, although it could enable growth, it is likely to have a negative impact on the environment by facilitating the loss of important wildlife (and amenity) areas, with negative social and environmental results. This could have a strongly negative cumulative effect given the scale of growth allocated to Ipswich in terms of the loss of these valuable areas, impact on quality of life (and town cramming) and reduction of vegetation that absorbs the CO2 emissions from extra developments.</u></p> <p><u>This appraisal has found that Options 2 and 3 are the strongest in sustainability terms. This is because they provide flexibility (unlike option 2) but provide the opportunity to ensure that wildlife areas are still given protection (unlike option 4). However, a key finding of this appraisal is that criteria are needed to ensure that a number of considerations are taken into account in determining whether changes are appropriate, and would improve such areas.</u></p> <p><u>This appraisal has found that these criteria should address the following areas:</u></p> <p><u>1. The maintenance and improvement of greenery/ vegetation. A possible aim could be a net gain of greenery in Ipswich. This has a number of associated impacts:</u></p> <ul style="list-style-type: none"> <li><u>Air and water quality;</u></li> <li><u>CO2 absorption</u></li> <li><u>Flooding/ surface water retention</u></li> </ul> <p><u>2. Soil resources: this also has a relevance to flooding through water retention.</u></p> <p><u>3. The amount and diversity of species: appropriate assessment should also be carried out in this regard.</u></p> <p><u>4. The character of historic sites (including historic wildlife sites) and landscapes</u></p>		
Core Strategy	Issue 6 contd : Conservation and Protection (historic areas and	<p>Option 1</p> <p>Option 1 is likely to have positive impacts in terms of waste minimisation, and preserving (but perhaps not enhancing)</p>	Core: Policy Area 4 Protecting our Assets	Largely the Council has concluded that protection matters can be covered by the use of national legislation and guidance and that it



	<p>buildings)</p> <p>buildings and areas of historic importance and townscapes. Possible negative impacts of Option 2 include soil resources/ quality, employment and housing growth (and linked to this, the achievement of prosperity), and in terms of the revitalisation of the town centre.</p> <p>In the context of existing legislation, this option would be more conservative than existing controls.</p> <hr/> <p>Option 2</p> <p><u>Option 2 is likely to have strongly positive impacts on historic buildings/ areas and townscapes. It is also likely to have positive impacts on soil, the delivery of housing and employment (and, related to this, promote prosperity and investment), the revitalisation of the town centre and crime reduction.</u></p> <p><u>It could also have positive impacts in terms of enabling more development to take place in more sustainable (central) locations.</u></p> <hr/> <p>It is unlikely to have any negative effects.</p> <hr/> <p>Option 3</p> <p>Is likely to have strongly positive impacts in terms of the protection and enhancement of historic sites and areas. It is also likely to have positive impacts on soil resources, quality of life, employment and housing delivery (and also the achievement of prosperity and attracting investment) and promoting crime reduction.</p> <hr/> <p><u>As with Option 2, it could also have positive impacts in terms of enabling more development to take place in more sustainable (central) locations. This options is also unlikely to have any negative sustainability outcomes.</u></p> <hr/> <p>Option 4</p> <p>Option 4 is likely to have similar outcomes to Options 2 and 3. This is because existing legislation already promotes the protection and enhancement of historic buildings and areas (but does not preclude development in these buildings/ areas).</p> <p>The key difference is that this option is likely to have <i>positive</i> impacts on historic buildings and areas and townscapes- as opposed to <i>strongly positive</i> impacts that are likely with</p>		<p>would not be appropriate to replicate such information within the Framework.</p> <p>However it is acknowledged that there are some local nuances to this and a policy basis is suggested within Policy Area 31.</p>
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		<p>options 2 and 3. This is because Options 2 and 3 offer the potential to go a little further than the legislation by setting out Ipswich-specific approaches that can target key areas that need improvement and promote improvements (as opposed to simply following legislation, which could not deliver this targeted approach).</p> <p>This appraisal has shown that options relating to the historic environment have a significant, direct impact on a limited number of issues. These key impacts relate to the character of historic buildings/ areas and townscapes, the delivery of employment and housing and the town centre. Significant but indirect impacts include the impact on quality of life and crime. Options 2 and 3 achieved the best sustainability results in these issues (along with the other, less significant issues).</p> <p>Options 2 and 3 appear to have the best sustainability scores because they promote the protection and enhancement of the historic environment, enabling growth in sustainable locations (the town centre and Waterfront). They could also enable a focused approach to the enhancement of areas in need of regeneration.</p> <p>Other key recommendations of this appraisal are:</p> <ul style="list-style-type: none"> <li>• Promote the re-use of historic (and other) buildings;</li> <li>• Facilitate the sustainable refurbishment of buildings (i.e. to enable greater energy efficiency);</li> <li>• Produce policies/ design guidance/ development briefs to enhance sites in need of regeneration (that are within conservation areas/ surround buildings or areas of historic or architectural importance);</li> <li>• A possible wording to policies to emphasise that new developments should <i>improve</i> the quality of these buildings/ areas (especially for those areas that need regeneration)</li> </ul> <p>The above recommendations could be used to supplement existing legislation, which is already in place to protect (and enhance) historic buildings/ areas.</p>		
Residential Requirements	Issue 1: Affordable Housing Targets	<p><u>In sustainability terms no negative impacts have been identified. Setting a target which aims to ensure a proportion of the total housing stock meets the needs of those who are currently unable to access suitable housing to meet their needs has a positive impact on key objectives HW2 (Improving quality of life), ER1 (Reducing poverty and social exclusion) and ER3 ( Providing for the housing requirements of the</u></p>	Core: Policy 14 Affordable Housing	The Council suggests within the objectives (number 3) that at least 35% of new dwelling units should be affordable and then has suggested a policy basis to deliver this within Policy Area 14.

		<p><u>whole community).</u></p> <p>There may also be some potential health benefits (HW1) associated with the potential for a resultant fall in homelessness/unfit living standards/overcrowding. In terms of the options 1-3 the benefits should increase in proportion to the increase in the level at which the target is set. This would mean that Option 3, which seeks to maximise the provision should have the greatest benefit. However this will only be true where the target level set does not prejudice the viability of delivering development schemes. Whichever target is selected the overall benefits would be positive, local, permanent and highly likely to occur in the short term. The results indicate that the affordable housing targets should be set as high as can be achieved without compromising the viability and deliverability of residential development sites.</p>		
Residential Requirements	Issue 2: Calculating Affordable Housing Contributions	The Issue explores the options on which affordable housing contributions calculations can be based. No significant positive or negative impacts of the options in sustainability terms have been identified.	Core: Policy 14 Affordable Housing, Policy Area 38 Detailed Affordable Housing Policies	
Residential Requirements	Issue 3: Balance between Shared Ownership & Rent	<p>The main benefits of affordable housing can be maximised by the provision of housing for rent as this will reach those who are currently most in need (due to overcrowding/homelessness etc) and are excluded from the housing market due to low/uncertain incomes and/or an inability to borrow money for any form of home ownership. It is therefore desirable to seek a higher proportion of social rented to shared ownership. However the impacts outlined above also highlight the need to consider viability and therefore deliverability of housing schemes. It also needs to be acknowledged that for some people, shared ownership may help to bridge the affordability gap so it does have a role to play in the housing market.</p> <p>In terms of the Options, Option 1 would rule out the possibility of any social rented housing. Alternatively, the discretionary approach set out in Option 4 would bring a good deal of uncertainty into the process and could lead to a much higher proportion of social rented thereby reducing the ability of schemes to meet those in greatest need.</p> <p>The benefits would therefore be maximised in relation to Options 2 &amp; 3 (80% or 50% housing for rent) .</p> <p>Possible changes to policy should therefore seek to maximise the level of housing for rent as far as is practicable with</p>	Core: Policy 14 Affordable Housing	The Council is suggesting that at least 65% of units on larger sites should be rented. This effectively falls between options 2 and 3 which are those most supported by the SA assessment.

		consideration for deliverability of housing schemes.		
Residential Requirements	Issue 4: Site Thresholds	<p>In sustainability terms no negative impacts of lowering the threshold for affordable housing have been identified. Setting a threshold, which aims to increase the affordable housing proportion of the total housing stock, would have the greatest positive impact on objectives HW2 (Improving Quality of Life), ER1 (Reducing poverty and Social Exclusion) and ER3 (Providing for the Housing Requirements of the Whole Community). This should also bring about greater health benefits (HW1) associated with the potential for resultant fall in homelessness/unfit living standards/overcrowding.</p> <p>Overall, Option 1, which seeks to maximise the provision should have the greatest benefit and Option 4 the least.</p> <p>Whichever threshold is selected the overall benefits would be highly likely, local, long term and permanent.</p>	Core: Policy 14 Affordable Housing	Option 1 is effectively that contained within Policy Area 14.
Residential Requirements	Issue 5: Off-site provision of Affordable Housing	<p>Options 1-4 will have a mostly neutral impact on the sustainability objectives. Positive impacts would be highly likely to arise in relation to objectives ET5, ER1&amp; ER3. The opportunities to reduce social exclusion will normally be most likely to result from maximising on site provision (ie. to achieve mixed communities rather than isolated/ excluded enclaves of affordable housing). However in some circumstances consideration on an individual site basis may conclude that the type and size of housing that could be provided off-site could meet the greatest need for affordable housing in the local area ( to be informed by the outcomes of the Strategic Housing Assessment and consultation with IBC Housing Services. A policy will need to be developed to reflect this position.</p> <p>As all of the options explored anticipate either full on site provision (Option 3) or an element of on and off site provision they would all lead to greater social inclusion. In this respect Option 1 would be likely to deliver the least benefit, followed by Option 4. Option 3 is ideal as it would expect all provision to be on site, however to make a better mix this could in some instances lead to a less satisfactory outcome than Option 2, particularly as experience has shown that it can lead to higher levels of shared ownership to social rented. Option 2 makes specific reference to off site provision having to make a better housing mix and is therefore likely to maximise the positive benefits of affordable housing provision.</p>	Core: Policy 14 Affordable Housing, Policy Area 38 Detailed Affordable Housing Policies	Policy Area 38 allows for the possibility of delivery off-site in accordance with a series of defined criteria. This broadly follows a combination of options 2 and 4.
Residential Requirements	Issue 6: Thresholds for open space / children's play	There are no negative impacts arising from imposing a threshold for open space/children's play space. For all options there are positive impacts relating to ET2, ET10, HW1 & HW2. The positive impacts will be greatest if the provision is	Core: Policy Area 22 Approach to Open Space, Policy Area 13	Option 3 is chosen in relation to open space and it is advocated the threshold is lowered to 10 dwellings (Policy Area 22).

	area provision	maximised by lowering the threshold (Option 3).	Residential Planning Gain Tariff	It is suggested that play areas be included within the Tariff system proposed by Policy Area 13.
Residential Requirements	Issue 7: Children's play area requirements	There is no clear preferred option arising from the sustainability appraisal analysis. Either Option will potentially result in benefits to peoples quality of life but whichever option is chosen it will be important that issues of design, maintenance and location are considered with a view to minimising potential opportunities for crime and anti social activity.	Core: Policy Area 22 Approach to Open Space, Policy Area 13 Residential Planning Gain Tariff	It is suggested that play areas be included within the Tariff system proposed by Policy Area 13.  This would give the Council greater ability to site such play areas in the most appropriate locations.
Residential Requirements	Issue 8: Contributions towards off site children's play areas	There are positive sustainability outcomes of each of the Options in relation to objectives ET4, 5 & 6 and HW1 & 2. However in many cases, the benefits of Option 3 are likely to be offset by the need to travel further to reach the play area thereby necessitating the use of a private car / bus.	Core: Policy Area 22 Approach to Open Space, Policy Area 13 Residential Planning Gain Tariff	It is suggested that play areas be included within the Tariff system proposed by Policy Area 13.  This would give the Council greater ability to site such play areas in the most appropriate locations.
Residential Requirements	Issue 9: Loss of recreational spaces and childrens play areas	<p>The impact of a potential redevelopment of open space will be very site specific.</p> <p><u>Overall, development or partial redevelopment of sites which are currently in use as open space will be likely to have a negative impact. Option 1 is therefore clearly preferable in sustainability terms.</u></p> <p>The benefits and disbenefits of the other Options are likely to be very site specific. Option 3 is the least preferred option as it does not make clear what is considered to be "suitable" whereas the other options relate to "better" provision elsewhere. For environmental effects to be minimised it will be necessary to evaluate development proposals on a site-by - site basis, taking account of the considerations listed in the right hand column above. Development proposals should only be acceptable where there is a net gain in terms of an improved and easily accessible recreational resource coupled with careful protection of wildlife, townscape and historic features of value.</p>	Core: Policy Area 22 Approach to Open Space	<p>It is recognised that many of these issues are addressed within national guidance.</p> <p>In addition Policy Area 31 sets out a local basis that reflects to some degree options 2 and 3.</p>
Residential Requirements	Issue 10: Setting Standards or providing guidance (sustainable building)	<p>Option 1 will have the least positive impact on sustainability objectives, basically because it would leave design issues to the developers' discretion. The effects are therefore uncertain but are more likely to be negative.</p> <p>In respect of the other 2 options, the impacts of standards and</p>	Core: Policy Area 28 Carbon Footprint, 29 Flooding & Sustainable Urban Drainage,	The Council has proposed a mixed approach which includes setting standards and objectives in some areas such as Policy Areas 28, 29 and 30.

		<p>guidance will be positive, provided they are not too prescriptive. It is likely that a combination of standards and guidance (where standards are not appropriate on their own) would result in the most positive sustainability outcomes. They should include measures aimed at reducing contributions to climate change, sustainable building practices, including waste water recycling, and waste reduction initiatives, green travel/accessibility planning, encouragement of pedestrian and cycle routes, access to public transport, adapting to flood risk, improving/encouraging diversity of habitat/species, protecting/enhancing areas/sites of historic importance and the role of design coding/master planning/design statements in improving quality of townscape and designing-out crime.</p>	30 Urban Design Guidance	
Residential Requirements	Issue 11: Scope of future planning contributions	<p>The list of potential contributions is extremely wide ranging so there are numerous positive impacts when considered against the sustainability objectives above.</p> <p>In terms of the options, Option 2 presents the least certain outcomes, mainly due to the fact that it is not known which of the contributions will be sought as a priority. However prioritisation would focus resources in a more concentrated way, so the benefits could be greater but for fewer initiatives. Conversely option 1 scores a lot of positives but would scatter the distribution of contributions widely and could therefore have a reduced effect overall. Option 3 also scores a lot of positives and will enable contributions to relate directly to the needs of the locality of the individual development sites.</p> <p>In terms of possible changes to improve performance, almost all of the objectives are being met by the proposed contributions. However sustainability appraisal will do little to assist in the process of deciding which of the issues should be the priority for planning contributions to be identified in Option 2 as all of the areas listed have a contribution to make in sustainability terms. This would point towards the adoption of a more flexible site-by-site approach to prioritisation, possibly supplemented by pooling of contributions towards more strategic schemes eg. road schemes.</p>	Core: Policy Area13 Residential Planning Gain Approach, 19 Non-residential Planning Gain Tariff	<p>It is suggested that a new Tariff system be introduced (Policy Area 13).</p> <p>The system proposed, whilst effectively following option 1, does give different weightings to the areas having regard to their priority and the likely costs associated with them.</p>
Site Allocations & Policies	Issue 1: The Identification of the Most Appropriate Use for Development Sites	<p><u>The uses allocated to sites could have impacts in environmental, social and economic terms. It appears that options 1 and 2 would have an uncertain or neutral impact on many objectives, but also a negative impact on some. The narrow focus of options 1 and 2 means that they would fail to address wider implications of growth, in particular relating to:</u></p>	Core: Policy Area 2 Approach to Locations of Development, 3 Approach to mixed use development, 7	<p>An overview of the approach to location of different types of development and the type and amount of development needed are provided in the Core Strategy. This approach is then applied at the local level on individual sites with regard</p>

		<ul style="list-style-type: none"> <li>• Access to key services, and to health and education facilities;</li> <li>• Sensitivity to flood risk;</li> <li>• Reducing the need to travel; and</li> <li>• The impact of growth on the town centre.</li> </ul> <p>The only clear positive impacts of options 1 and 2 relate to the two objectives to which they are both related, i.e. housing and employment. However, either option could create an imbalance, either failing to adequately provide sufficient housing, or sufficient jobs.</p> <p>Option 3 would appear to have an uncertain impact on growth overall. Bearing in mind the scale of growth planned for Ipswich, it would therefore that this would be a risky approach, failing to provide a logical strategic approach. This is reflected in the fact that it would fail to create efficient patterns of movement across the Borough. A flexible approach could be beneficial in allocating uses that could affect historic areas, special landscapes or townscapes, and wildlife areas.</p> <p>Options 4 and 5 appear to have the most positive impacts in all areas. It should be noted that these options (especially option 5) appear to cross-relate to the decision as to whether to allocate a site for development at all. These options appear to be the most sustainable, and could be amended and added to in order to provide criteria/ a sequential approach that in particular addresses:</p> <ul style="list-style-type: none"> <li>• Efficient patterns of movement</li> <li>• Guiding development to brownfield land (link to decision to allocate for development in the first instance)</li> <li>• Consideration of local needs/ local facilities, including access to/ impact on key services</li> <li>• Avoiding putting sensitive uses in areas of flood risk</li> <li>• Revitalising town centres</li> <li>• Local amenity.</li> </ul> <p>By providing a framework for balanced growth, and for the selection of the best sites for employment sites, options 4 and 5 could also be used to deliver growth in a balanced way overall (compared to options 1 and 2), whilst ensuring that employment sites are high quality, thus increasing the likelihood of their attractiveness to investors/ employers.</p>	<p>Amount of Housing Required, 15 Number of Jobs to be planned for</p> <p>IPOne : Sequential approach to location of development</p>	to the nature of the site and its surroundings.
Site Allocations &	Issue 2: The Balance Between	In some areas, this issue and the options provided have a neutral or uncertain impact on the sustainability appraisal	Core : Policy Area 7 Amount of	An overview of the approach to the type and amount of development

Policies	Housing and Employment Use	<p>objectives. However, the options provided are likely to have impacts on certain key areas, such as traffic, access to services, quality of life and community participation, employment and economic growth, vulnerability to flood risk and impact on town centres.</p> <p>Option 1 would be likely to have a number of positive benefits relating to:</p> <ul style="list-style-type: none"> <li>• Traffic impact;</li> <li>• Access to services;</li> <li>• Quality of life and community participation;</li> <li>• Possible crime reduction as mixed uses increase natural surveillance</li> <li>• Social inclusion</li> </ul> <p>Possible improvements to this option include ensuring that employment uses in mixed areas do not have harmful impacts on residential amenity/ health; ensuring that the mix does not have a harmful impact on the town centre by certain possible limits on retail/employment; and allowing for employment-led or employment only areas where appropriate (as well as local opportunities) to allow for a diverse range of employment opportunities.</p> <p>Option 2 does not appear to have any clear negative sustainability implications. Benefits of this option include:</p> <ul style="list-style-type: none"> <li>• Traffic impact;</li> <li>• Adaptability to flood risk;</li> <li>• Quality of life</li> <li>• Balanced employment opportunities;</li> <li>• Town centre vitality; and</li> <li>• Enabling focused economic growth.</li> </ul> <p>Option 3 has several potential negative implications:</p> <ul style="list-style-type: none"> <li>• Increased traffic congestion and pollution;</li> <li>• Poor access to services;</li> <li>• Possible negative impact on town centre</li> </ul> <p>It could be positive in avoiding delivery of housing in flood risk areas, and delivering dedicated employment areas.</p> <p>Overall therefore, a combination of options 1 and 2 seems preferable. By doing so, the benefits of option 1 could be achieved, whilst achieving the more strategic overview suggested by option 2. Option 3 could be used in the approach</p>	<p>Housing Required &amp; 8 Number of jobs to be planned for, 3 The approach to mixed use development.</p> <p>Site Allocations : Policy Area 39 Protection of identified sites for the uses proposed, 41 Identification &amp; Protection of Employment Areas</p>	<p>needed are provided in the Core Strategy. This approach is then applied at the local level on individual sites (within Ip-One &amp; Site Allocations) with regard to the nature of the site and its surroundings.</p>
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		to some employment locations that are inherently vehicle-dependent, and so have different needs to other employment, and housing developments.		
Site Allocations & Policies	Issue 3: Phasing of Allocated Sites	<p>The options are likely to impact on a number of sustainability appraisal objectives.</p> <p>Option 1, it would be hoped, should be carried out anyway, as sustainability appraisal should influence site selection, and the phasing approach selected should be influenced by this appraisal.</p> <p>Option 2 is likely to have a number of negative effects as it would facilitate growth without considering:</p> <ul style="list-style-type: none"> <li>• Sustainability of locations/ sustainable travel: climate change and congestion</li> <li>• No priority is given to brownfield development</li> <li>• Impact on services</li> <li>• Impact on biodiversity</li> <li>• Impact on the town centre</li> </ul> <p>Option 2 would have positive impacts in terms of maximising the delivery of housing and employment growth, and the speed with which it is achieved.</p> <p>Option 3 may restrict the achievement of the required housing and employment targets, and fail to address flood risk when prioritising site delivery. However, this option would have a number of positive effects:</p> <ul style="list-style-type: none"> <li>• Prioritising development on brownfield land</li> <li>• Flood risk</li> <li>• Protecting biodiversity</li> <li>• Protecting and enhancing historic sites and special townscapes and landscapes.</li> <li>• Quality of life and crime reduction.</li> </ul> <p>The single negative implication of Option 4 is that it fails to take into account flood risk in the prioritisation of sites. It is not clear whether this option would facilitate or obstruct the achievement of housing and employment targets. This option has several likely benefits:</p> <ul style="list-style-type: none"> <li>• Conservation of soil by prioritising brownfield development</li> <li>• Protecting biodiversity and landscapes/ townscapes</li> <li>• Quality of life, with the caveat that town cramming should be avoided</li> </ul>	Core: Policy Area 1 Approach to sustainable development,	The Core Strategy sets out an overarching approach to sustainable development . This will underpin the location and phasing of development. There are also issues relating to delivery of sites at a more detailed level, which will need to be considered prior to submission stage.

		<p>Option 4 could potentially secure positive impacts in other areas. It could be amended/ reworded to set out the precise 'priorities' that it reflects, e.g.:</p> <ul style="list-style-type: none"> <li>• Brownfield development</li> <li>• Flood risk</li> <li>• Development towards central areas of the borough</li> </ul>		
		<p>None of the options address flood risk as an issue for site prioritisation.</p> <p>None of the approaches address the need to phase development alongside the provision of infrastructure. In relation to the SA objectives set out above, I suggest the following infrastructure provisions be considered in this:</p> <ul style="list-style-type: none"> <li>• Transport (Objectives ET4/ ER6)</li> <li>• Delivery of supporting services (ET5/ HW1)</li> <li>• Flood protection infrastructure (ET7)</li> </ul> <p>Phasing could also be used to ensure a balance between housing and employment needs (and Regional targets).</p> <p><b>Conclusion</b> Option 4 appears to be the most sustainable , although this could be amended, perhaps replacing 'regeneration' with 'sustainability', be more specific as to the priorities that are involved, and incorporate the extra issues suggested above. The approach selected should also seek to balance housing and employment development.</p>		
Site Allocations & Policies	Issue 4: Comments on Individual Sites	No conclusions		
Site Allocations & Policies	Issue 5i: Location of Greenfield Development	No conclusions		
Site Allocations & Policies	Issue 5ii: Timing of Greenfield Development	No conclusions		
Site Allocations & Policies	Issue 6: Accessibility of Sites	No conclusions		
IP-One AAP	Issue 1: Objectives	<p>Overall, Option 1 seems to perform better than Option 2. The exception to this is in relation to some of the environmental objectives, where Option 2 performs better in relation to biodiversity. However, in the commentaries it becomes clear that the impacts of all of the objectives will depend on how the objectives are translated into policies in the development plan</p>	IP-One Vision, Objectives & Spatial Strategy	<p>Most of these points have been reflected in the vision, objectives and spatial strategy, for example:</p> <ul style="list-style-type: none"> <li>• In the Vision, 'Exciting new architecture designed to cope with changing conditions arising</li> </ul>

		<p>documents.</p> <p>One or two areas for improvement to, or expansion of, Option 1 and/or Option 2 objectives have been identified:</p> <ul style="list-style-type: none"> <li>• Sustaining the economy</li> <li>• Protecting biodiversity and designated habitats</li> <li>• Efficient use of land/soil conservation</li> <li>• Protecting the built and natural heritage</li> <li>• Minimising waste</li> <li>• Minimising the effects of traffic, and</li> <li>• Designing for the effects of climate change.</li> </ul>		<p>from climate change’;</p> <ul style="list-style-type: none"> <li>• In the Objectives, ‘Provide for high quality high density jobs growth ...’ and ‘Improve the urban form and environmental performance of central Ipswich ...’</li> <li>• In the Spatial Strategy, ‘ Identify pedestrian and cycle route improvement priorities...’.</li> </ul>
IP-One AAP	Issue 2: Policies tailored to areas	<p><u>The impacts of all these options seem generally to be neutral, with the exception of possible benefits attached to a sub-area focus, either on the town centre and Education Quarter (Option 2) or on smaller areas (Option 3), to ensure sustainability objectives are achieved.</u></p> <p><u>The more significant factors in affecting the objectives appear to be:</u></p> <p><u>a. The land allocations made – and these could be made within the IP-One plan with or without a sub-area focus for policies; and</u></p> <p><u>b. The need for a suite of robust development control policies ensuring that all developments take account of basic requirements such as improving air and water quality. These factors should be picked up and explored in more detail in the appraisal of the Site Allocations and Core Strategy and Policies development plan documents respectively.</u></p>	<p>IP-One Part C Opportunity Areas</p> <p>IP-One Appendix A</p> <p>Core Strategy Policy Area 29 Flooding &amp; Sustainable Urban Drainage &amp; 34 Travel Demand Management &amp; 31 Protecting our Assets</p>	<p>The Opportunity Areas identified in Part C of IP-One broadly reflect Option 3. The Council has identified areas such as the Education Quarter or the area around Westgate (the former Civic Centre) where change is expected, and set out the principles for redevelopment. In doing so the sketch master plans illustrate how those principles may be put into effect on the ground.</p> <p>The site profile sheets in Appendix A indicate some of the sustainability information considered in allocating sites, eg, certain physical or policy constraints and some accessibility criteria.</p> <p>The Core Strategy development control policies section picks up some of the elements that are needed to ensure every development reflects environmental considerations, but some are also left to Planning Policy Statements in accordance with LDF guidance that says national policy should not be duplicated.</p>
IP-One AAP	Issue 3: Town Centre Vision	<p>Generally the results suggest that positive impacts are more likely to result from having a vision than not having one, although to some extent these impacts will depend on what the vision is. Thus Options 1 and 3 perform best in the</p>	IP-One Objectives & Vision & Spatial Strategy	<p>The vision for the town centre is incorporated into that for IP-One as a whole, because the area action plan proposes to extend the town</p>

		<p>assessment, with Option 1 performing particularly strongly against the economic and social objectives. Only Option 2 actually includes negative impacts on factors such as quality of life, because of its inherent ad hoc nature.</p> <p>The main impacts, however, would flow from how the vision is translated into policies and proposals, hence for some of the sustainability objectives there is no likely significant impact. There are a couple of pointers as to amendments to the vision set out in Option 1, and additional areas to cover in a vision. These include:</p> <ul style="list-style-type: none"> <li>• Prioritising non-car mobility over the car within the town centre;</li> <li>• Explicitly recognising the service centre role of the town centre;</li> <li>• Emphasising conservation and distinctiveness in the town centre, underpinned by an analysis of its character and what makes it distinctive;</li> <li>• Considering whether the vision needs to be more explicit about encouraging investment; and Improving access to education.</li> </ul>		<p>centre boundary such that the vast majority of the IP-One area would now fall within the town centre.</p> <p>Under Issue 1 above I indicate how the IP-One vision, objectives and spatial strategy have responded to the sustainability appraisal findings.</p>
IP-One AAP	Issue 4 Planning for Growth	<p>As there are many options under this issue, it helps to make the task more manageable if the options are broadly categorised for the purposes of assessment. The categories are: no change from existing situation (Option 1), expand CSA and make site allocations (Options 2-4), expand CSA without site allocations (Options 5 and 6), limit site allocations to retail use only (Option 7) make allocations for retail and mixed use (Option 8), and finally rely on development control policies rather than site allocations to guide development.</p> <p>Overall it would appear that the options for planned change have a more positive impact than the status quo options, and that the mixed use development of the sites identified could yield greater benefits than retail only development. However, there are a few pointers as to how more positive effects resulting from the expansion of the CSA and the allocation of site(s) for retail or mixed development could be assured:</p> <ul style="list-style-type: none"> <li>• Need to set development within the context of a comprehensive town centre strategy;</li> <li>• Consider planning conditions about local recruitment;</li> <li>• Need strong policies to protect the character of conservation areas.</li> <li>• Need to ensure that any residential development within the town centre is supported by adequate key</li> </ul>	<p>IP-One Policy Areas 57, 58 &amp; 60.</p> <p>IP-One Vision, Objectives and Spatial Strategy</p> <p>Core Strategy Policy Areas 1 Approach to</p>	<p>The approach taken in the IP-One Area Action Plan is to extend the Central Shopping Area (northwards and westwards) and allocate three sites for new retail-led mixed development. Thus it reflects Options 2-4 in terms of the Central Shopping Area, and Option 8 in terms of the approach to site allocations.</p> <p>The overall IP-One vision, objectives and spatial strategy provide the framework for this approach to the Central Shopping Area. This is also made possible by the borough-wide framework set out in the Core Strategy, which limits out-of-centre shopping.</p> <p>The local recruitment issue is picked up in IP-One objective 4 and spatial strategy paragraph 6.5 but it is a field in which more work needs to be done to develop a workable approach.</p>

		<p>services.</p> <ul style="list-style-type: none"> <li>• Need to ensure that any new buildings do not contribute to climate change.</li> <li>• Must have rigorous flood risk assessment requirements in place for new development in the flood plain.</li> <li>• Should ensure all new development addresses optimising biodiversity.</li> </ul>	<p>Sustainable Development; 23 Strategic Flood Defence; 27 Electricity Capacity; 29 Flooding; 31 Protecting our Assets;</p>	<p>Various parts of the Core Strategy help to address these points, for example Policy Area 27 recognises the need for new electricity sub station to serve Ipswich town centre (see also IP-One Policy Area 65). The main exception is probably biodiversity which PPS9 already covers.</p>
IP-One AAP	Issue 5: Town Centre/Waterfront Shopping	<p>Option 1 represents the more permissive approach to out of centre retailing, subject to a strict size limit to safeguard the retail role of the central shopping area. Option 2 also allows the possibility of out of centre shops but offers less certainty. Both therefore have the potential for positive impacts in terms of community, access, work opportunities and even health, but these benefits may only flow from certain types of shop. This makes the impacts difficult to predict with any certainty. The counter view is that small speciality shops could attract customers from a wide area and thereby encourage car-borne trips with all the associated impacts on climate change and air quality.</p>	IP-One Policy Area 59	<p>The approach taken is to allow small shops at the Waterfront only, outside the Central Shopping Area.</p>
IP-One AAP	Issue 6: Connections within IP One	<p>I would anticipate no negative impacts from any of these four options. Whichever is selected will benefit people living or working in that part of town and the local and global environment if improved pedestrian routes can help people to switch from car to foot. Coupled with this is the need to ensure that routes are planned and designed to ensure users' safety.</p>	IP-One Policy Area 52	<p>Improvements to the provision for pedestrians and cyclists are proposed in each of the Opportunity Areas.</p>
IP- One AAP	Issue 7: Additional Facilities	<p>The main areas of negative impact arising from these options relate to the potential harm of the built development options (1 to 3) on factors such as soil and biodiversity. However, some of these potential impacts should be capable of avoidance or mitigation through the application of appropriate policies, such as providing for biodiversity in new developments. The same options, however, also have the potential to offer social or economic benefits – even if these may be indirect, such as boosting the borough's image. It is questionable whether those impacts would be significant but I have recorded them nevertheless.</p>	<p>Proposals made under IP-One Policy Areas 49 Community Facilities and 62 Green Space and Play</p> <p>Appendix A (for individual site proposals)</p>	<p>Suggested community facility allocations (e.g. a school and a community meeting place) are listed in under Policy Area 49. Open space is covered under Policy Area 62.</p> <p>The general points about minimising the effects of built development have been covered above, eg under Issue 2.</p>
IP- One AAP	Issue 8: Urban Design	<p>A strong framework of urban design policies should help to ensure positive impacts on objectives such as distinctiveness, traffic generation and safety. It probably does not make much difference whether the approach to the policies is area based or criteria based, although the former may pick up more</p>	IP1 Part C Opportunity Areas & Policy Area 63 Urban Design	<p>The approach taken is a combined one that should maximize positive impacts. The Opportunity Area studies in Part C of IP-One set out an approach to matters such as</p>

		strongly on each area's unique character. In terms of landmark buildings, positive impacts are generally more likely to result from having a policy than not having one. Any policies on these topics need to address crime and safety matters.	Guidelines; Core Strategy Policy Area 30 urban Design	building height for each area, whilst the Core Strategy proposes a requirement for design statements.  In addition, Policy area 63 of IP-One goes into more detail on the issue of height and landmark buildings and suggests a framework for the location of such buildings.
IP- One AAP	Issue 9: Office Location Strategy	New office development in IP-One under any of the three options would have clear economic benefits. Potential negative environmental impacts arising from trip generation, resource consumption or building-related emissions, for example, need to be minimised through such measures as green travel plans and green construction policies (that should apply equally across the borough). In terms of reconciling competing demands for development land, particularly the demand for housing land, office provision through mixed use developments is an approach to consider, provided this is consistent with what potential investors require.	Core Strategy Policy Area 34 Travel Demand Management, 28 Carbon Footprint, 3 Mixed Use, 31 Protecting our assets, IP-One Appendix A Mixed Use Allocations.	Appendix A of IP-One suggests site allocations for both office only development, and office development as part of a mix of uses, so as to provide choice for investors. All fall within the redefined town centre. The central location for new office developments, plus a requirement for travel plans (Core Strategy Policy Area 34) should help to keep any negative effects to a minimum.
IP- One AAP	Issue 10: Delivery	Delivery of the policies and proposals in the IP-One Area Action Plan will be essential to ensure that the possible positive impacts are realised and negative impacts minimised. However, the delivery mechanism itself should not impact on the sustainability objectives. The only way in which it could do so would be through different approaches to delivery providing different opportunities for community or stakeholder involvement. Therefore the main conclusion is the need to ensure that any delivery mechanism or group involves the appropriate range of people.	IP-One Part D - Delivery	More work needs to be done on delivery. However, a start has been made in Part D of IP-One which identifies for some key sites who the landowner and other lead players are, where they are known.

## Appendix 2: Updated list of scoped documents

### International context

- The Johannesburg Declaration on Sustainable Development – Commitments arising from summit. Sept 2002
- The UN Millennium Declaration and Millennium Development Goals – Sept 2000
- Kyoto Protocol and the UN Framework Convention on Climate Change – May 1992
- Bern Convention on the Conservation of European Wildlife and Natural Habitats – 1979
- Ramsar convention on Wetlands of international importance especially as waterfowl habitat – 1971
- Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)
- The European Spatial Development Perspective
- European Directives:
  - Air Quality*
    - Air Quality Framework Directive – 96/62/EC
    - The 1st Daughter Directive – 1999/30/EC
    - The 2nd Daughter Directive – 2000/69/EC
    - The 3rd Daughter Directive relating to Ozone – 2002/69/EC
  - Climate Change*
    - Directive to promote electricity from renewable energy – 2001/77/EC
    - Directive for the encouragement of bio-fuels for transport – 2003/30/EC
  - Water*
    - Water Framework Directive – 2000/60/EC
    - Urban Waste Water Treatment Directive – 91/271/EEC
    - Water pollution caused by Nitrates from agricultural sources: Nitrates Directive – 91/676/EEC
    - Bathing Water Quality Directive – 76/160/EEC
    - Drinking Water Directive – 98/83/EC
  - Land Use*
    - Nature and Biodiversity*
      - Directive 79/409/EEC on the Conservation of Wild Birds
      - Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora
  - Waste Management*
    - Framework Waste directive 75/442/EEC, as amended
    - Directive 99/31/EC on the landfill of waste
    - Packaging and packaging waste directive – 94/62/EC of 20 Dec 1994

### National, Regional and Local Context

- UK Sustainable Development Strategy (March 2005)
- Sustainable Communities Plan: Building for the Future (2003)
- Planning Policy Statement 1: Delivering Sustainable Development
- PPG2 – Green Belts (Jan 95)
- PPG3 – Housing (March 2000)
- Government Consultation on a new Planning Policy Statement 3: Housing (December 2005)
- PPG4 – Industrial and Commercial Development and Small Firms (Nov 92)
- PPG5 – Simplified Planning Zones (Nov 92)
- PPS6 – Planning for Town Centres (2005)
- PPG8 – Telecommunications
- PPS9 – Biodiversity and Geological Conservation (August 2005)
- PPS10 – Planning for Sustainable Waste Management (July 2005)
- PPS11 – Regional Spatial Strategies

- PPS12 – Local Development Frameworks (Aug 04)
- PPG13 – Transport (March 94) (Covered in RSS)
- PPG14 – Development on Unstable Land (April 90)
- PPG15 – Planning and the Historic Environment (Sept 94)
- PPG16 – Archaeology and Planning (Nov 90)
- PPG17 – Planning for Open Space, Sport and Recreation (July 02)
- PPG21 – Tourism (Nov 92)
- PPS22 – Renewable Energy (Aug 04)
- Planning Policy Statement 23: Planning and Pollution Control (2004)
- PPG24 – Planning and Noise (Sept 94) (RSS)
- PPG25 – Development and Flood Risk (July 01) (RSS)
- Regional Spatial Strategy – RSS (banked version April 2004) \*
- RSS14 for the East of England SEA Scoping Report (17 September 2004)
- Government/Department of Transport: 10 Year Transport Plan 2000 (RSS)
- East of England Regional Transport Strategy (April 2003) (Incorporated as a chapter in RPG14) (RSS)
- East of England European Strategy 2003 – 2004, June 2003 (RSS)
- Towns and Cities Strategy and Action Plan, Urban Renaissance in the East of England (RSS)
- Towards Sustainable Construction – A Strategy for the East of England, Draft 2003 (RSS)
- Suffolk Local Transport Plan
- A Sustainable Development Framework for the East of England, October 2001 (RSS)
- Neighbouring Authority Plans and National Park Plans
  - Babergh Local Plan 1995
  - Mid Suffolk Local Plan (September 1998)
  - Suffolk Coastal Local Plan, First alteration, February 2001
- Regional Social Strategy for the East of England, May 2004
- Health and Social Inclusion Strategy (EERA Health and Social Inclusion Panel) – Unable to find this but Regional Health Strategy Board is overseeing a project plan agreed in June 04 to produce a Regional Health Strategy – reporting to EERA via Health and social Inclusion Panel.
- Culture: a catalyst for change. A Strategy for Cultural Development for the East of England, Living East (June 2004)
- Suffolk Supporting People Five-Year Strategy 2005-2010 (August 2005)
- Suffolk Supporting People Five-Year Strategy 2005-2010 (August 2005)
- Regional Housing Strategy for the East of England 2005-2010 (July 2005)
- Affordable Housing Study: The Provision of Affordable Housing in the East of England 1996-2021, 2003 (RSS)
- Ipswich Housing Strategy Consultation Draft January 2006
- Ipswich Housing Study January 2005
- One-Ipswich: A Community Plan For Ipswich (July 2004)
- Draft Ipswich Cultural Strategy 2005

## **Environment**

- Environment, Our future: Regional Environment Strategy for the East of England, East of England Regional Assembly and East of England Environment Forum, July 2003 (RSS)
- Climate Change – UK Programme, DETR, November 2000 (RSS)
- Living with Climate Change in the East of England – summary Report supported by technical report (2003) (RSS)
- National Air Quality Strategy for England, Wales, Scotland and Northern Ireland (Jan 2000) (RSS)
- Environment Agency River Basin Management Plans (or Catchment Flood Management Plans), Water Resources Strategies, Flood and Coastal Defence Strategies, Shoreline Management Plans



- Water resources for the future: A Strategy for Anglian Region (RSS)
- National and Regional Biodiversity Action Plans, Local Biodiversity Action Plans, Species Action Plans, Habitat Action Plans, Coastal Habitat Management Plans
- Woodland for Life: The Regional Woodland Strategy for the East of England, November 2003 (RSS)
- Regional Waste Management Strategy (2002) (RSS)
- Joint Municipal Waste Management Strategy for Suffolk – Oct 2003
- Ipswich Environment Strategy 2005

### **Economic**

- Regional Economic Strategy for the East of England – Progressing a Shared Vision (consultation draft due for completion 2004) (RSS)
- Prioritisation in the East of England, June 2003 (RSS)
- International Business Strategy, Consultation Draft, December 2003 (RSS)
- Regional Emphasis Document SR2004, December 2003 (RSS)
- Framework for Regional Employment and Skills Action (FRESA) (RSS)
- IBC Corporate Strategy – Transforming Ipswich
- The Ipswich Prospectus – growth for prosperity
- Ipswich Economic Development Strategy
- Area Investment Framework for Ipswich 2004
- IP-One Area Action Plan 2003
- Ipswich Retail Study 2005
- Planning Policy Statement 3- Housing (November 2006)
- Planning Policy Statement 25- Development and Flood Risk (December 2006)
- Proposed Changes to the Draft East of England Plan (December 2006)

### Appendix 3: SEA Framework

SA Theme	SEA Objective	SEA Indicator	SEA Sub-Indicator	How to measure
Environment & Transport	ET1. To improve water and air quality	ET1a. Air and water quality	Water quality in rivers	(ND)
			Groundwater quality	?
			No. of days of air pollution	A/S
			No. of Air Quality Management Areas and dwellings affected	DA
			Achievement of Emission Limit Values	?
	ET2. To conserve soil resources and quality	ET2a. Area of contaminated land returned to beneficial use		?
		ET2b. Development on brownfield land	(see ET10a)	(AMR)
		ET2c. Density of new development	Density figures	(AMR?)
	ET3. To reduce waste	ET3a. Tonnage of household waste produced and recycled	Percentage of household (and municipal) waste recycled	DA
	ET4. To reduce the effects of traffic on the environment	ET4a. Traffic volumes, access to local services and journeys taken by sustainable modes	Green travel plans submitted with major applications	(PL, SCC)
			Percentage of journeys to work undertaken by sustainable modes	(Census, employer surveys)
			Percentage of children travelling to school by sustainable modes	(ND)
			Car parking standards (compliance with PPG13 standards)	PL
			Proportion of major new developments that provide a mix of uses	PL
	ET5. To improve access to key services for all sectors of the population	ET5a. Proportion of new developments with access to key services by walking, cycling and public transport.		(AMR)
	ET6. To reduce contributions to climate change	ET6a. Level of energy efficiency in homes and energy consumption	Level of per capita consumption of electricity	DA
			Level of energy efficiency in homes	PL
			Percentage of energy needs in new development met by renewable energy.	
	ET7. To reduce vulnerability to climatic events and increasing sea levels	ET7a. Developments and land at risk of flooding	No. of planning applications approved where EA have objected on flood risk grounds	PL
			No. properties at risk of flooding that are within 1,000 year return period flood risk area (EA)	Environment Agency
		ET7b. Effects of heat	Provision of shading and greening (i.e. avoiding the heat island effect)	?
			Future proofing homes against hotter temperatures	PL
	ET8. To protect,	ET8a. Area (ha) of woodland		? Bio Records

	maintain and enhance the diversity and abundance of species and their habitats to implement a net gain and to avoid habitat fragmentation	ET8b Changes in extent of Natura 2000 sites		Centre?
		ET8c. Extent and condition of key habitats for which BAPS have been established		
	ET9. To conserve and, where appropriate, enhance areas of historical importance	ET9a. Risks to listed buildings, conservation areas and historic parks and gardens	No. of listed buildings and buildings at risk	DA
			Area (ha) of historic parks and gardens	DA
			No and area (ha) of Conservation Areas and Article 4 Directions	DA
			No. of Conservation Area Appraisals completed and enhancement schemes implemented	DA
		ET9b. Planning permissions adversely affecting known or potential designated assets (historic buildings, archaeological sites etc).		PL
	ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	ET10a. Percentage / No. of new dwellings completed / committed on brownfield land.	Percentage / No. of new dwellings completed on previously developed land	PL/ AMR
			Percentage of existing housing commitments on previously developed land	PL/ AMR
			No. of vacant dwellings	Empty Survey (latest 2004)
		ET8b. Area (ha) of designated landscapes – Area of Outstanding Natural Beauty (AONB)		DA
	ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	E11a. Percentage of SSSIs, SPAs and SACs in good condition		BIO Records Centre?
	HW1. To improve the health of those most in need	HW1a. Proportion of population with access to hospital / GP / Dentist		(Take from AMR relating to ET6b above)
		HW1b. Proportion of journeys to work by foot or by bicycle		Census, employer surveys

		HW1c. How children travel to school (QOL / BVPI)		ND
	HW2. To improve the quality of life where people live and encourage community participation	HW2a. Play and open space quality, quantity and accessibility	Change in existing outdoor play space provision	UR
			Change in existing provision of childrens play space	UR
			Change in provision of open space	?
		HW2b. Percentage of residents who are happy with their neighbourhood as a place to live		Suffolk Speaks
	ER1. To reduce poverty and social exclusion	ER1a. Proportion of population who live in wards that rank within the 10% most deprived in the country		Index of Multiple Deprivation
	ER1b. Provision of childcare		No. of neighbourhood nurseries available	?
			No. of childcare places available	?
	ER2. To offer everybody the opportunity for rewarding and satisfying employment	ER2a. Data relating to employment and economic activity in the area	Unemployment rate	Nimois/ census
			Long term unemployment (NOMIS) February 2005)	Nimois/ census
			Average earnings	Inland Revenue/ AMR
	ER3. To help meet the housing requirements for the whole community	ER3a. Data relating to housing including stock type, land availability and affordability	Homelessness	DA
			Housing Stock (SSAG)	DA
			Housing Land Availability	DA
			Affordable Housing	DA
			Housing Types and Sizes	Lack of data
			(links to ET2c: housing density)	
			Average property price to income ratio	DA
			No. of unfit houses per 1,000 dwellings (BVPI)	BVPI
		ER3b. Identify sites to meet RSS housing requirements		SPAR
	ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	ER4a. Planning consents for employment uses and take up of employment floorspace	Take up of employment floorspace	AMR
			Employment permissions and completions	PL/AMR
			Planning consents for B1, B2 and B8 uses	PL/AMR
		ER4b. Data relating to businesses and employment issues	No. / Percentage employed by employment division	ONS
			No./ Percentage businesses by main industry type	DA
			No. / Percentage employed by size (no. of employees)	DA
			No. / Percentage employed by industry type in key sectors	Borough Council
			Comparative industrial / office rental costs	DCLG town centre data/ estate

	ER5. To revitalise town centre		Percentage of town centre units with A1 uses	SPAR retail study data
			No. / Percentage of vacant retail units in town centres	SPAR retail study data
			Percentage of town centre where 'liveability' has been enhanced through public realm works	?
	ER6. To encourage efficient patterns of movement in support of economic growth	ER6a. No. / Percentage of people working from home	Borough Statistics	Census PL
		See ET4a	Live work units provided on major sites	
	ER7. To encourage and accommodate both indigenous and inward investment	ER7a. Business start ups and closures		SDA
		ER7b. No. of business enquiries to SDA / LA / SCC by types and size of site		?
		ER7c. Employment and accessibility, permissions and allocations	Employment Land Availability	SPAR SURVEY WORK
			Employment permissions and allocations	SPAR/AMR
	CL1. To maintain and improve access to education and skills in the population overall	CL1a. GCSE Attainment Levels (Grades A*-C)	% of Year 11 pupils gaining 5+ A-C grades at GCSE	DA
		CL1b. Proportion of the population with no qualifications	Proportion of the population with no qualifications	(Census)
Crime and Disorder	CD1. To minimise potential opportunities for crime and anti-social activity	CD1a. Recorded crime per 1,000 population		Census?
		CD1b. Burglary Rate	Burglary Rate per 1000 population (SDA)	SDA
		CD1c. Fear of Crime (QOL, Suffolk Speaks, British Crime Survey)	% of respondents who feel safe in the place where they live	Suffolk Speaks
			% of respondents who feel their area is safe within low levels of crime and disorder.	
		CD1d. Number of noise complaints (Environmental Health Departments Statistics)	Number of domestic noise complaints	Environmental Health Dept

ND/? : No data/ Unclear where data will come from  
 PL: Planning Data  
 SDA: Suffolk Development Agency  
 SPAR: Part of monitoring work already carried out by SPAR

AMR: Part of work carried out on the SPAR AMR  
 UR: Under Review  
 A/S: Data Available Soon  
 DA: Data available (though at source currently unclear)



### Appendix 4: Site Specific SA Framework

SA Theme	SEA Objective	SEA Indicator	SEA Sub-Indicator	Proposed Site Specific Indicator	Link to IBC Site Assessment Sheet	Score System	Source
Environment & Transport	ET1. To improve water and air quality	ET1a. Air and water quality	Water quality in rivers	Is the site abutting the waterfront?	29	Yes: - No: 0	OS Map
			Groundwater quality				
			No. of days of air pollution	Is the site in an air quality management area?	30	Yes: - No: 0	IBC Site Survey
			No. of Air Quality Management Areas and dwellings affected				
			Achievement of Emission Limit Values				
	ET2. To conserve soil resources and quality	ET2a. Area of contaminated land returned to beneficial use	Would it lead to the restoration of contaminated land?	Is the site on contaminated land?	23	Yes: + No: 0	IBC Site Survey
		ET2b. Development on brownfield land	(see ET10a)	Is the site on brownfield land?	23	Yes: + No: 0	IBC Site Survey / SCC Air Photographs
		ET2c. Density of new development	Density figures	Is the site likely to be above a critical? Density?	42	High: + Medium: 0 Low: -	IBC
	ET3. To reduce waste	ET3a. Tonnage of household waste produced and recycled	Percentage of household (and municipal) waste recycled	Is the site within 3miles of a household waste site?		Yes: 0 No: -	SCC Mapping
	ET4. To reduce the effects of traffic on the environment	ET4a. Traffic volumes, access to local services and journeys taken by sustainable modes	Green travel plans submitted with major applications	na	na	na	
			Percentage of journeys to work undertaken by sustainable modes	Are there any cycle paths adjacent to the site?		Yes: + No: 0	SCC Mapping
			Percentage of children travelling to school by sustainable modes				
			Car parking standards (compliance with PPG13 standards)	Is a concern regarding traffic expressed in the site survey?		Yes: - No: 0	IBC Site Survey
			Proportion of major new developments that provide a mix of uses	na	na	na	

SA Theme	SEA Objective	SEA Indicator	SEA Sub-Indicator	Proposed Site Specific Indicator	Link to IBC Site Assessment Sheet	Score System	Source
	ET5. To improve access to key services for all sectors of the population	ET5a. Proportion of new developments with access to key services by walking, cycling and public transport.		Is the site within 400m of a GP?	5, 36	Yes: + No: -	IBC Mapping
				Is the site within 30mins by public transport of a secondary school?	5, 36	Yes: + No: -	SCC Accession
				Is the site within 400m of a primary school?	5, 36	Yes: + No: -	IBC Mapping
				Is there a SportEngland registered site within 1 mile of the site?	5, 36	Yes: + No: -	SportEngland Website
				Is the site within 400m of the town centre?	5, 36	Yes: + No: -	IBC Mapping
				Is the site within 400m of a meeting place?	5, 36	Yes: + No: -	IBC Mapping
				Is the site within 400m of a convenience store?	5, 36	Yes: + No: -	IBC Mapping
	ET6. To reduce contributions to climate change	ET6a. Level of energy efficiency in homes and energy consumption	Level of per capita consumption of electricity	Is the site large enough it itself or in combination with a nearby site to support decentralised (renewable) power?	47	Yes: + No: 0	IBC
			Level of energy efficiency in homes				



SA Theme	SEA Objective	SEA Indicator	SEA Sub-Indicator	Proposed Site Specific Indicator	Link to IBC Site Assessment Sheet	Score System	Source
	ET7. To reduce vulnerability to climatic events and increasing sea levels	ET7a. Developments and land at risk of flooding	Percentage of energy needs in new development met by renewable energy.	NB – What is the criteria here? – Not in Core Strategy			
			No. of planning applications approved where EA have objected on flood risk grounds	Is the site in a flood risk area?	24	Yes: - No: 0	IBC Site Survey
		ET7b. Effects of heat	No. properties at risk of flooding that are within 1,000 year return period flood risk area (EA)				
			Provision of shading and greening (i.e. avoiding the heat island effect)		Na	na	
			Future proofing homes against hotter temperatures		na	Na	
	ET8. To protect, maintain and enhance the diversity and abundance of species and their habitats to implement a net gain and to avoid habitat fragmentation	ET8a. Area (ha) of woodland		What is the extent of vegetation present on the site? (Site survey)	13	Significant: - Insignificant: 0	IBC Site Survey / SCC Aerial Photographs
		ET8b Changes in extent of Natura 2000 sites		Is the site on or close to a Natura 2000 site?	15	Yes: - No: 0	IBC Site Survey / SCC Mapping
		ET8c. Extent and condition of key habitats for which BAPS have been established		Is there potential for BAP species on the site?	15	Yes / Unknown: - No: 0	Data Source Required
				Is there potential for BAP habitats on the site?	15	Yes / Unknown: - No: 0	Data Source Required
			Ensuring development will not interfere with protected species.	Is there a protected species within 50m of the site?	15	Yes: - No: 0	SCC Mapping

SA Theme	SEA Objective	SEA Indicator	SEA Sub-Indicator	Proposed Site Specific Indicator	Link to IBC Site Assessment Sheet	Score System	Source
				Is there a local nature reserve on or abutting the site?	15	Yes: - No: 0	SCC Mapping
				Is the site on or abutting a designated wildlife site?	15	Yes: - No: 0	SCC Mapping
	ET9. To conserve and, where appropriate, enhance areas of historical importance	ET9a. Risks to listed buildings, conservation areas and historic parks and gardens	No. of listed buildings and buildings at risk	Are there any listed buildings on or abutting the site?	33	Yes: - No: 0	IBC Site Survey
			Archaeological concerns	Will the site interfere with an archaeological site?	31	Yes: - No: 0	IBC Site Survey
			Area (ha) of historic parks and gardens	Are there historic parks or gardens on or abutting the site?		Yes: - No: 0	SCC Mapping
			No and area (ha) of Conservation Areas and Article 4 Directions	Is the site on or abutting a conservation area?	32	Yes: - No: 0	IBC Site Survey / SCC Mapping
			No. of Conservation Area Appraisals completed and enhancement schemes implemented		Na	Na	
			ET9b. Planning permissions adversely affecting known or potential designated assets (historic buildings, archaeological sites etc).		na	Na	
	ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	ET10a. Percentage / No. of new dwellings completed / committed on brownfield land.	Percentage / No. of new dwellings completed on previously developed land	Is the site on derelict land?	1	Yes: + No: 0	IBC Site Survey
			Percentage of existing housing commitments on previously	Will the site interfere with distinctive character? (Site survey)	9	Significantly: - - Moderately: - Unknown: 0 No: +	IBC Site Survey

SA Theme	SEA Objective	SEA Indicator	SEA Sub-Indicator	Proposed Site Specific Indicator	Link to IBC Site Assessment Sheet	Score System	Source
			developed land	Will the site threaten important views? (Site survey)	10	Significantly: - - Moderately: - Unknown: 0 No: +	IBC Site Survey
				Will the site threaten townscapes or landscapes? (Site Survey)	11	Significantly: - - Moderately: - Unknown: 0 No: +	IBC Site Survey
			No. of vacant dwellings			na	
		ET8b. Area (ha) of designated landscapes – Area of Outstanding Natural Beauty (AONB)		Is the site on or abutting an AONB?	28	Yes: - No: 0	SCC Mapping
	ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	E11a. Percentage of SSSIs, SPAs and SACs in good condition		Is the site on or abutting an SSSI?	28	Yes: - No: 0	SCC Mapping
				Is the site on or abutting a SPA?	28	Yes: - No: 0	SCC Mapping
	HW1. To improve the health of those most in need	HW1a. Proportion of population with access to hospital / GP / Dentist		Is the site within 400m of a GP?	36	Yes: + No: 0	IBC Mapping
				Is the site within 400m of a dentist?	36	Yes: + No: 0	IBC Mapping
		HW1b. Proportion of journeys to work by foot or by bicycle		Is the site within 400m of the town centre?	36	Yes: + No: 0	IBC Mapping
		HW1c. How children travel to school (QOL / BVPI)		Is there a primary school within 30mins by foot or cycling?	36	Yes: + No: 0	SCC Accession
				Is there a secondary school within 30mins by public transport?	36	Yes: + No: 0	SCC Accession

SA Theme	SEA Objective	SEA Indicator	SEA Sub-Indicator	Proposed Site Specific Indicator	Link to IBC Site Assessment Sheet	Score System	Source
	HW2. To improve the quality of life where people live and encourage community participation	HW2a. Play and open space quality, quantity and accessibility		Is the site on potentially hazardous land / previous landfill?	36	Yes: - / No: 0	IBC Site Survey
			Change in existing outdoor play space provision	Is the site close to leisure facilities? (<1mile?)	7	Yes: + No: 0	OS Map
			Change in existing provision of children's play space	Is the site close to employment areas? (<1mile?)	7	Yes: + No: 0	OS Map
			Change in provision of open space	Is the site close to housing? (<1mile?)		Yes: + No: 0	OS Map
				Is the site currently open space?	1	Yes: - No: 0	IBC Site Survey / OS Map / SCC Aerial Photographs
				Is the site currently play space?	1	Yes: - No: 0	IBC Site Survey / OS Map / SCC Aerial Photographs
				Is the site proposed for leisure development?		Yes: + No: 0	IBC Site Survey / Development Plan Document
		HW2b. Percentage of residents who are happy with their neighbourhood as a place to live		Is the site close to an obvious source of noise? (Railway line)		Yes: - No: 0	OS Map
	ER1. To reduce poverty and social exclusion	ER1a. Proportion of population who live in wards that rank within the <u>20</u> % most deprived in the country		Is the site within a LSOA which ranks within the top 20% of the most deprived wards according to IMD 2007?	41	Yes: + No: 0	SCC Mapping
		ER1b. Provision of childcare	No. of neighbourhood nurseries available			na	
			No. of childcare places available			na	
	ER2. To offer everybody the opportunity for rewarding and satisfying employment	ER2a. Data relating to employment and economic activity in the area	Unemployment rate	Is the town centre within 400m? (NA if within town centre)	38	Yes: + No: 0	IBC Mapping
			Long term unemployment (NOMIS) February 2005)	Is the site within a key employment area?	45	Yes: + No: 0	IBC

SA Theme	SEA Objective	SEA Indicator	SEA Sub-Indicator	Proposed Site Specific Indicator	Link to IBC Site Assessment Sheet	Score System	Source
			Average earnings				
				Is the site proposed for employment?		Yes: + No: 0	IBC Site Survey / Development Plan Document
	ER3. To help meet the housing requirements for the whole community	ER3a. Data relating to housing including stock type, land availability and affordability	Homelessness	Is the site large enough to accommodate affordable housing? (>5 units must be 20% affordable as per C. Strategy)	44	Yes: + No: 0	IBC Core Strategy / IBC Site Survey
			Housing Stock (SSAG)				
			Housing Land Availability				
			Affordable Housing				
			Housing Types and Sizes				
			(links to ET2c: housing density)				
			Average property price to income ratio				
			No. of unfit houses per 1,000 dwellings (BVPI)				
		ER3b. Identify sites to meet RSS housing requirements		Is the site proposed for housing?		Yes: + No: -	IBC Core Strategy / IBC Site Survey
	ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	ER4a. Planning consents for employment uses and take up of employment floorspace	Take up of employment floorspace			na	
			Employment permissions and completions			na	
			Planning consents for B1, B2 and B8 uses	Is the site large enough to support a mix of uses?	46	Yes: + No: 0	IBC
		ER4b. Data relating to businesses and employment issues	No. / Percentage employed by employment division			na	
			No./ Percentage businesses by main industry type			na	
			No. / Percentage employed by size (no. of employees)			na	

SA Theme	SEA Objective	SEA Indicator	SEA Sub-Indicator	Proposed Site Specific Indicator	Link to IBC Site Assessment Sheet	Score System	Source
e an d e			No. / Percentage employed by industry type in key sectors			na	
			Comparative industrial / office rental costs			na	
	ER5. To revitalise town centre		Percentage of town centre units with A1 uses	Is the site within the town centre?	38	Yes: ++ No: 0	IBC Mapping / Site Survey
			No. / Percentage of vacant retail units in town centres	Is the town centre within 400m? (Na if within town centre)	38	Yes: + No: 0	IBC Mapping / Site Survey
			Percentage of town centre where 'liveability' has been enhanced through public realm works				
	ER6. To encourage efficient patterns of movement in support of economic growth	ER6a. No. / Percentage of people working from home	Borough Statistics			na	
			Live work units provided on major sites				
		See ET4a				na	
	ER7. To encourage and accommodate both indigenous and inward investment	ER7a. Business start ups and closures		Is the railway station accessible within 800m?	37	Yes: + No: 0	IBC Mapping
				Is the A14 or A12 within 1km?	37	Yes: + No: 0	SCC Accession / SCC Mapping
		ER7b. No. of business enquiries to SDA / LA / SCC by types and size of site		Either repeat indicators concerning proximity and access to town centre or omit.	na	na	
		ER7c. Employment and accessibility, permissions and allocations	Employment Land Availability				
			Employment permissions and allocations				
CL1	CL1. To maintain and improve access to education and skills	CL1a. GCSE Attainment Levels (Grades A*-C)	% of Year 11 pupils gaining 5+ A-C grades	Is a primary school within 400m?		Yes: + No: 0	IBC Mapping

	in the population overall		at GCSE	Is a secondary school within 30mins by public transport? Is a further education (16+) establishment within 30mins by public transport?		Yes: + No: 0	SCC Accession
		CL1b. Proportion of the population with no qualifications	Proportion of the population with no qualifications	Covered above			
Crime and Disorder	CD1. To minimise potential opportunities for crime and anti-social activity	CD1a. Recorded crime per 1,000 population		Is the area within one of the worst 20% of LSOA's in terms of crime deprivation? (IMD 2007)	Cd1	Yes: - No: 0	SCC Mapping
		CD1b. Burglary Rate	Burglary Rate per 1000 population (SDA)				
		CD1c. Fear of Crime (QOL, Suffolk Speaks, British Crime Survey)	% of respondents who feel safe in the place where they live % of respondents who feel their area is safe within low levels of crime and disorder.				
		CD1d. Number of noise complaints (Environmental Health Departments Statistics)	Number of domestic noise complaints	No indicator available	na		

*Pink Cells indicate indicators or criteria omitted by SCC, where data wasn't available or appropriate.  
Yellow cells indicate repeated indicators.*

*This tables also shows the scoring system used.*

*A simple "+" and "-" scoring system has been adapted, whereby these represent negative and positive impacts. We have also used "0" for no impact or repeated data, as well as "?" if there is uncertainty about the direction of the possible impact.*

## Appendix 5: Sustainability Appraisal Tables

Policy Area 1: Sustainable development	Preferred Option	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5**	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	+ Aims to place considerable weight on environmental issues	- No standard for env. footprints may mean environment is damaged						
ET2. To conserve soil resources and quality	+ Aims to place considerable weight on environmental issues	- No standard for env. footprints may mean environment is damaged						
ET3. To reduce waste	+ Aims to place considerable weight on environmental issues	- No standard for env. footprints may mean environment is damaged						
ET4. To reduce the effects of traffic upon the environment	+ Aims to place considerable weight on environmental issues	- No standard for env. footprints may mean environment is damaged						
ET5. To improve access to key services for all sectors of the population	(no mention of amenities)							
ET6. To reduce contributions to climate change	++ Aims for a strong focus on low carbon developments	-- No standards for environmental footprint	++ Aims for all developments to be carbon neutral	+ Aims for some developments to be carbon neutral	+ Unclear method may reduce effectiveness of carbon reduction scheme	++ Using eco-homes standard would reduce carbon emissions		
ET7. To reduce vulnerability to climatic events and increasing sea levels	++ Reflects importance of sea level and tidal rises and risk of flooding							
ET8. To conserve and enhance biodiversity	+ Aims to place considerable weight on environmental issues	- No standard for env. footprints may mean environment is damaged						
ET9. To conserve and where appropriate enhance areas and sites of historical importance								
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes								
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	+ Aims to place considerable weight on environmental issues	- No standard for env. footprints may mean environment is damaged						
HW1. To improve the health of those most in need	(no mention of accessibility)						(P) + Placing weight on environmental issues may reduce traffic, improving air quality and encouraging walking/cycling, which may improve health	
HW2. To improve the quality of life where people live and encourage community participation	(no mention of amenities)						(P) + Reducing traffic may improve quality of life for local residents	
ER1. To reduce poverty and social exclusion								
ER2. To offer everybody the opportunity for rewarding and satisfying employment								
ER3. To help meet the housing requirements for the whole community								
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area								
ER5. To revitalise town centres								
ER6. To encourage efficient patterns of movement in support of economic growth								
ER7. To encourage and accommodate both indigenous and inward investment								
CL1. To maintain and improve access to education and skills for both young people and adults								
CD1. To minimise potential opportunities for crime and anti-social activity								



<b>Core Strategy Policy Area 2: Development location</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Locating development at main shopping centres could reduce trip generation	- Concentrating development in town centre may generate more trips	- Development may be located in areas without services, generating trips	? Depends on location of alternative centres		
<b>ET2. To conserve soil resources and quality</b>	- May result on greenfield land being used in the northern fringe	+ Will not use greenfield sites				
<b>ET3. To reduce waste</b>						
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Locating development at main shopping centres could reduce trip generation/length	- Concentrating development in town centre may generate more trips and may increase congestion	- Development may be located in areas without services, generating trips and increasing trip length	? Depends on location of alternative centres		
<b>ET5. To improve access to key services for all sectors of the population</b>	++ Aims to locate development at service centres and increase % of people living there	-- Will not locate development near all sectors of population	- Development may be located in areas without services	? Depends on location of alternative centres		
<b>ET6. To reduce contributions to climate change</b>						
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	- May involve development in flood risk areas to south and west of town centre	-- Areas around town centre are vulnerable to flooding	- May locate development in flood risk areas in south/west Ipswich	? Depends on location of alternative centres		
<b>ET8. To conserve and enhance biodiversity</b>						
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+ May keep historic buildings in use					
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>						
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>						
<b>HW1. To improve the health of those most in need</b>	++ Aims for open space/leisure areas to be dispersed throughout Ipswich; location near services mean people may walk/cycle rather than drive	- Concentrating development in town centre may mean that people may drive rather than walk/cycle	- Locating development in areas without key services means that people may drive rather than walk/cycle	? Depends on location of alternative centres		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Aims for open space to be dispersed throughout Ipswich					
<b>ER1. To reduce poverty and social exclusion</b>	+ Locating development at key service centres reduces exclusion	- Will not spread development	- Development may be located in areas without services			
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Aims to spread development	- Will not spread development	- May locate new housing away from new employment			
<b>ER3. To help meet the housing requirements for the whole community</b>	+ Will spread development across town	- Will only focus on town centre	+ Will spread development across town	? Depends on location of alternative centres		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Aims to spread development	- Will not spread development	+ Aims to spread development			
<b>ER5. To revitalise town centres</b>	+ Aims to focus development in the town centre	++ Concentrates development in town centre	- May take business away from town centre			
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Locating development at main shopping centres could reduce trip generation	- Concentrating development in town centre may generate more trips	- Development may be located in areas without services, generating trips	? Depends on location of alternative centres		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>						
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>						
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+ More leisure facilities may help reduce crime/anti-social activity					

<b>Core Strategy Policy Area 3: Mixed use developments</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	+ Mixed use developments may reduce trip generation	- May result in single use developments, encouraging trip generation	? Depends on level of mixing		
ET2. To conserve soil resources and quality					
ET3. To reduce waste					
ET4. To reduce the effects of traffic upon the environment	+ Mixed use developments may reduce trip generation	- May result in single use developments, encouraging trip generation	? Depends on level of mixing		
ET5. To improve access to key services for all sectors of the population	+ Mixed use developments may mean services/housing are located in same place	- May mean services and housing are not located in same place	? Depends on level of mixing		
ET6. To reduce contributions to climate change					
ET7. To reduce vulnerability to climatic events and increasing sea levels					
ET8. To conserve and enhance biodiversity					
ET9. To conserve and where appropriate enhance areas and sites of historical importance					
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes					
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs					
HW1. To improve the health of those most in need	+ Mixed use developments mean more people can walk/cycle to services	- May reduce the % of people who can walk/cycle to work or services	? Depends on level of mixing		
HW2. To improve the quality of life where people live and encourage community participation					
ER1. To reduce poverty and social exclusion	+ Mixed use developments mean employment may be available across Ipswich	- May reduce spread of employment	? Depends on level of mixing		
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+ Mixed use developments mean employment may be available across Ipswich	- May reduce spread of employment	? Depends on level of mixing		
ER3. To help meet the housing requirements for the whole community					
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Mixed use developments mean employment may be available across Ipswich	- May reduce spread of employment	? Depends on level of mixing		
ER5. To revitalise town centres					
ER6. To encourage efficient patterns of movement in support of economic growth	+ Mixed use developments may reduce trip generation	- May result in single use developments, encouraging trip generation	? Depends on level of mixing		
ER7. To encourage and accommodate both indigenous and inward investment					
CL1. To maintain and improve access to education and skills for both young people and adults					
CD1. To minimise potential opportunities for crime and anti-social activity					

<b>Core Strategy Policy Area 4: Protecting assets</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality						
ET2. To conserve soil resources and quality						
ET3. To reduce waste						
ET4. To reduce the effects of traffic upon the environment						
ET5. To improve access to key services for all sectors of the population						
ET6. To reduce contributions to climate change						
ET7. To reduce vulnerability to climatic events and increasing sea levels						
ET8. To conserve and enhance biodiversity	+ Recognises importance of nature/wildlife designations	++ Seeks to includes lots of protection policies				
ET9. To conserve and where appropriate enhance areas and sites of historical importance	+ Seeks to develop a policy for conservation areas	++ Seeks to includes lots of protection policies	++ Strengthens protection of Conservation Areas	- Weakens protection of Conservation Areas		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	- Anticipates major changes to townscape	++ Seeks to includes lots of protection policies	++ Strengthens protection of Conservation Areas	- Weakens protection of Conservation Areas		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	+ Recognises importance of nature/wildlife designations	++ Seeks to includes lots of protection policies				
HW1. To improve the health of those most in need						
HW2. To improve the quality of life where people live and encourage community participation						
ER1. To reduce poverty and social exclusion						
ER2. To offer everybody the opportunity for rewarding and satisfying employment						
ER3. To help meet the housing requirements for the whole community						
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area						
ER5. To revitalise town centres						
ER6. To encourage efficient patterns of movement in support of economic growth						
ER7. To encourage and accommodate both indigenous and inward investment						
CL1. To maintain and improve access to education and skills for both young people and adults						
CD1. To minimise potential opportunities for crime and anti-social activity						

<b>Core Strategy Policy Area 5: Urban design</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality					
ET2. To conserve soil resources and quality					
ET3. To reduce waste					
ET4. To reduce the effects of traffic upon the environment					
ET5. To improve access to key services for all sectors of the population					
ET6. To reduce contributions to climate change					
ET7. To reduce vulnerability to climatic events and increasing sea levels	+ Aims for development that is designed for changing environment				
ET8. To conserve and enhance biodiversity					
ET9. To conserve and where appropriate enhance areas and sites of historical importance		++ A more specific urban design policy may help protect historic buildings	-- Would not be a policy on urban design		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		++ A more specific urban design policy may help protect historic townscape	-- Would not be a policy on urban design		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs					
HW1. To improve the health of those most in need					
HW2. To improve the quality of life where people live and encourage community participation	+ Aims for development that is designed for adaptable lifestyles	+ Good design increases satisfaction	- Poor design reduces quality of where people life		
ER1. To reduce poverty and social exclusion					
ER2. To offer everybody the opportunity for rewarding and satisfying employment					
ER3. To help meet the housing requirements for the whole community	+ Aims for development that is designed for adaptable lifestyles				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area					
ER5. To revitalise town centres		+ Good urban design may help attract inward investment			
ER6. To encourage efficient patterns of movement in support of economic growth					
ER7. To encourage and accommodate both indigenous and inward investment	- Lack of urban design policy may hamper attempts to attract investment	+ Good urban design may help attract inward investment	- Lack of urban design policy may hamper attempts to attract investment		
CL1. To maintain and improve access to education and skills for both young people and adults					
CD1. To minimise potential opportunities for crime and anti-social activity		+ Good urban design may reduce crime and anti-social behaviour			

<b>Core Strategy Policy Area 6: IPA</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Joint working may help locate key services/housing in a way that reduces traffic	++ Joint working may help locate key services/housing in a way that reduces traffic	+ Joint working may help locate key services/housing in a way that reduces traffic	- May mean housing/services do not meet up across borders, increasing traffic		
<b>ET2. To conserve soil resources and quality</b>	+ Joint working may allow PDL to be used in preference to greenfield	++ Joint working may allow PDL to be used in preference to greenfield	+ Joint working may allow PDL to be used in preference to greenfield			
<b>ET3. To reduce waste</b>						
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Joint working may help locate key services/housing in a way that reduces traffic	++ Joint working may help locate key services/housing in a way that reduces traffic	+ Joint working may help locate key services/housing in a way that reduces traffic	- May mean housing/services do not meet up across borders, increasing traffic		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Joint working may help locate key services/housing to meets needs of people living in border areas	++ Joint working may help locate key services/housing to meets needs of people living in border areas	+ Joint working may help locate key services/housing to meets needs of people living in border areas	- May result in poor co-location of services/housing in border areas		
<b>ET6. To reduce contributions to climate change</b>						
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>		+ Housing may be located out of the flood plain				
<b>ET8. To conserve and enhance biodiversity</b>						
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>		+ Less development in Ipswich town centre may mean less disturbance to archaeology				
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>						
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>		- May put pressure on waterfront sites to the south of Ipswich				
<b>HW1. To improve the health of those most in need</b>	+ Joint working may help locate key services/housing in a way that encourages walking/cycling	++ Joint working may help locate key services/housing in a way that encourages walking/cycling	+ Joint working may help locate key services/housing in a way that encourages walking/cycling	- May result in poor co-location of services/housing in border areas, meaning more people have to drive		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>						
<b>ER1. To reduce poverty and social exclusion</b>	+ Joint working may help locate key services/housing to meets needs of people living in border areas	++ Joint working may help locate key services/housing to meets needs of people living in border areas	+ Joint working may help locate key services/housing to meets needs of people living in border areas	- May result in poor co-location of services/housing in border areas		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Joint working may help co-locate housing and employment	- May delay planning process, resulting in fewer employment sites	- May delay planning process, resulting in fewer employment sites			
<b>ER3. To help meet the housing requirements for the whole community</b>		- May delay planning process, resulting in less housing being built	- May delay planning process, resulting in less housing being built			
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>		- May delay planning process, resulting in fewer employment sites	- May delay planning process, resulting in fewer employment sites			
<b>ER5. To revitalise town centres</b>		- May delay planning process, resulting in less town centre development	- May delay planning process, resulting in less town centre development			
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Joint working may help locate key services/housing in a way that reduces traffic	++ Joint working may help locate key services/housing in a way that reduces traffic	+ Joint working may help locate key services/housing in a way that reduces traffic	- May mean housing/services do not meet up across borders, increasing traffic		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>		- May delay planning process, resulting in fewer employment sites	- May delay planning process, resulting in fewer employment sites			
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>						
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>						

<b>Core Strategy Policy Area 7: Amount of housing</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	- More housing will generate more traffic	? Unable to assess unless assumptions are known	? Unable to assess unless assumptions are known		
<b>ET2. To conserve soil resources and quality</b>	- May require greenfield land	? Unable to assess unless assumptions are known	? Unable to assess unless assumptions are known		
<b>ET3. To reduce waste</b>	- More housing means more waste	? Unable to assess unless assumptions are known	? Unable to assess unless assumptions are known		
<b>ET4. To reduce the effects of traffic upon the environment</b>	- More housing will generate more traffic	? Unable to assess unless assumptions are known	? Unable to assess unless assumptions are known		
<b>ET5. To improve access to key services for all sectors of the population</b>					
<b>ET6. To reduce contributions to climate change</b>	- More housing will use more energy	? Unable to assess unless assumptions are known	? Unable to assess unless assumptions are known		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	- May be built on flood zones	? Unable to assess unless assumptions are known	? Unable to assess unless assumptions are known		
<b>ET8. To conserve and enhance biodiversity</b>	- May be built on wildlife sites	? Unable to assess unless assumptions are known	? Unable to assess unless assumptions are known		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	- May be built on archaeological sites	? Unable to assess unless assumptions are known	? Unable to assess unless assumptions are known		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	- Large amounts of new housing may damage townscape	? Unable to assess unless assumptions are known	? Unable to assess unless assumptions are known		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>					
<b>HW2. To improve the quality of life where people live and encourage community participation</b>					
<b>ER1. To reduce poverty and social exclusion</b>					
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>					
<b>ER3. To help meet the housing requirements for the whole community</b>	++ Aims for 11,500 dwellings between 2007 and 2021	? Unable to assess unless assumptions are known	? Unable to assess unless assumptions are known		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					
<b>ER5. To revitalise town centres</b>	+ Increasing population of town may boost town centre	? Unable to assess unless assumptions are known	? Unable to assess unless assumptions are known		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>					
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	- More housing will generate more traffic	? Unable to assess unless assumptions are known	? Unable to assess unless assumptions are known		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>					

<b>Core Strategy Policy Area 8: House/flat balance</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Higher density of housing around service centres may reduce trip generation		+ Would ensure high density of housing around service centres		
<b>ET2. To conserve soil resources and quality</b>	+ Higher density of housing conserves soil resources		+ Higher density of housing conserves soil resources		
<b>ET3. To reduce waste</b>				-- Recycling levels are lower in flats due to bins not being emptied as some residents may put in wrong stuff and they do not have brown bins	
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Higher density of housing around service centres may reduce trip generation		+ Would ensure high density of housing around service centres		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Aims for higher density of housing around service centres		+ Would ensure high density of housing around service centres		
<b>ET6. To reduce contributions to climate change</b>	+ Combined Heat & Power schemes are more viable in high density developments		+ Combined Heat & Power schemes are more viable in high density developments		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	- May result in houses being built in flood risk areas; flats may be preferable if ground floor is uninhabited		- May result in houses being built in flood risk areas; flats may be preferable if ground floor is uninhabited		
<b>ET8. To conserve and enhance biodiversity</b>					
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>					
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>					
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>	+ Higher density of housing around service centres may mean more can walk/cycle		+ Would ensure high density of housing around service centres		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>					
<b>ER1. To reduce poverty and social exclusion</b>	+ Aims for higher density of housing around service centres		+ Would ensure high density of housing around service centres		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Aims for higher density of housing around service centres		+ Aims for higher density of housing around service centres		
<b>ER3. To help meet the housing requirements for the whole community</b>	+ Aims to provide a mix of housing	++ May be able to better provide for the housing requirements of the community	- May result in a shortage of certain housing types in some areas		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					
<b>ER5. To revitalise town centres</b>	+ High density of housing around town centre may help revitalisation efforts		+ Would ensure high density of housing around service centres		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Higher density of housing around service centres may reduce trip generation		+ Would ensure high density of housing around service centres		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>					
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>					

<b>Core Strategy Policy Area 9: Density</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ High densities around service centres may reduce trip generation	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities	++ Higher densities around service centres may reduce trip generation		
<b>ET2. To conserve soil resources and quality</b>	+ Would ensure less greenfield land is required for development	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities	++ Higher densities may mean less greenfield land is required		
<b>ET3. To reduce waste</b>					
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ High densities around service centres may reduce trip generation	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities	++ Higher densities around service centres may reduce trip generation		
<b>ET5. To improve access to key services for all sectors of the population</b>					
<b>ET6. To reduce contributions to climate change</b>	+ High density of housing may reduce CO <sub>2</sub> emissions, especially if CHP schemes are used	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities	++ Higher density of housing may reduce CO <sub>2</sub> emissions, especially if CHP schemes are used		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>					
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>					
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>					
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>	+ High densities around service centres may encourage walking/cycling	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities	++ High densities around service centres may encourage walking/cycling		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>					
<b>ER1. To reduce poverty and social exclusion</b>					
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>					
<b>ER3. To help meet the housing requirements for the whole community</b>	+ High density of housing means more can be built	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities	++ Higher densities means more can be built		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					
<b>ER5. To revitalise town centres</b>	+ High densities in town centre may improves its vitality	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities	++ Higher densities in town centre may improves its vitality		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ High densities around service centres may reduce trip generation	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities	++ Higher densities around service centres may reduce trip generation		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ May mean more land is available for employment use	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities	++ Higher densities may mean more land is available for employment use		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>					



<b>Core Strategy Policy Area 10: PDL target</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ PDL is likely to be closer to existing services than new greenfield sites, reducing trip generation	? Depends on new target			
<b>ET2. To conserve soil resources and quality</b>	++ Aims for very high use of PDL (90%)	? Depends on new target			
<b>ET3. To reduce waste</b>					
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ PDL is likely to be closer to existing services than new greenfield sites, reducing trip generation	? Depends on new target			
<b>ET5. To improve access to key services for all sectors of the population</b>	+ PDL is likely to be closer to existing services than new greenfield sites	? Depends on new target			
<b>ET6. To reduce contributions to climate change</b>					
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	- Much PDL may be in flood risk zones	? Depends on new target			
<b>ET8. To conserve and enhance biodiversity</b>	- Building on PDL may harm biodiversity	? Depends on new target			
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+ Building on PDL may enhance sites of historical importance if they are currently run down	? Depends on new target			
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Building on PDL may enhance townscape if it are currently run down	? Depends on new target			
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	+ Using PDL reduces need for new development on/near protected sites	? Depends on new target			
<b>HW1. To improve the health of those most in need</b>					
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Developing on PDL may improve currently run down areas	? Depends on new target			
<b>ER1. To reduce poverty and social exclusion</b>	+ PDL is likely to be closer to existing services than new greenfield sites	? Depends on new target			
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>					
<b>ER3. To help meet the housing requirements for the whole community</b>					
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					
<b>ER5. To revitalise town centres</b>	+ May use PDL in town centre, improving its vitality	? Depends on new target			
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ PDL is likely to be closer to existing services than new greenfield sites, reducing trip generation	? Depends on new target			
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>					
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>					

<b>Core Strategy Policy Area 11: Greenfield land</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality		+/- New housing will generate traffic, but will be near train station				
ET2. To conserve soil resources and quality	? Does not allocate greenfield land for development, but notes that it may be in future	-- Will use greenfield land	- Will allocate land in future	+ Puts pressure on to use PDL		(P, 2, 3) In the long term greenfield land may be used
ET3. To reduce waste		- New housing may create more waste				
ET4. To reduce the effects of traffic upon the environment		+/- New housing will generate traffic, but will be near train station				
ET5. To improve access to key services for all sectors of the population						
ET6. To reduce contributions to climate change		- New housing may use more energy				
ET7. To reduce vulnerability to climatic events and increasing sea levels		+ New site not in flood risk area				
ET8. To conserve and enhance biodiversity	- Greenfield land has less biodiversity potential than brownfield land	- Development may harm protected species	+ Good for biodiversity if land is left derelict for a long period	- Greenfield land has less biodiversity potential than brownfield land		
ET9. To conserve and where appropriate enhance areas and sites of historical importance		- Development may damage archaeological sites				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		- Developing on greenfield sites may spoil landscape				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	0 No greenfield sites in northern fringe are protected areas					
HW1. To improve the health of those most in need						
HW2. To improve the quality of life where people live and encourage community participation						
ER1. To reduce poverty and social exclusion		+ More housing available could lower prices				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				- May constrain development of employment sites		
ER3. To help meet the housing requirements for the whole community		+ May help meet housing needs of northern Ipswich		- May constrain housing development		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				- May constrain development of employment sites		
ER5. To revitalise town centres	+ Concentrates development in town area			+ Concentrates development in town area		
ER6. To encourage efficient patterns of movement in support of economic growth		+/- New housing will generate traffic, but will be near train station				
ER7. To encourage and accommodate both indigenous and inward investment				- May constrain development of employment sites		
CL1. To maintain and improve access to education and skills for both young people and adults						
CD1. To minimise potential opportunities for crime and anti-social activity			- Land being left derelict for long period may cause anti-social behaviour			

<b>Core Strategy Policy Area 12: Gypsies &amp; travellers</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality					
ET2. To conserve soil resources and quality					
ET3. To reduce waste					
ET4. To reduce the effects of traffic upon the environment					
ET5. To improve access to key services for all sectors of the population					
ET6. To reduce contributions to climate change					
ET7. To reduce vulnerability to climatic events and increasing sea levels					
ET8. To conserve and enhance biodiversity					
ET9. To conserve and where appropriate enhance areas and sites of historical importance					
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes					
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs					
HW1. To improve the health of those most in need					
HW2. To improve the quality of life where people live and encourage community participation					
ER1. To reduce poverty and social exclusion	+ Aims to support proposals for travellers sites	++ Would allocate more sites for travellers	-- Would oppose any more sites for travellers		
ER2. To offer everybody the opportunity for rewarding and satisfying employment					
ER3. To help meet the housing requirements for the whole community	+ Aims to support proposals for travellers sites	++ Would allocate more sites for travellers	-- Would oppose any more sites for travellers		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area					
ER5. To revitalise town centres					
ER6. To encourage efficient patterns of movement in support of economic growth					
ER7. To encourage and accommodate both indigenous and inward investment					
CL1. To maintain and improve access to education and skills for both young people and adults					
CD1. To minimise potential opportunities for crime and anti-social activity					

<b>Core Strategy Policy Area 13: Residential planning gain tariff approach</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ May require on-site services in some developments, reducing trip generation	+ May require on-site services in some developments, reducing trip generation				
<b>ET2. To conserve soil resources and quality</b>						
<b>ET3. To reduce waste</b>						
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ May require on-site services in some developments, reducing trip generation	+ May require on-site services in some developments, reducing trip generation				
<b>ET5. To improve access to key services for all sectors of the population</b>	+ May require on-site services in some developments	+ May require on-site services in some developments				
<b>ET6. To reduce contributions to climate change</b>						
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>						
<b>ET8. To conserve and enhance biodiversity</b>	+ Provides funds for conservation	+ Provides funds for conservation		- May provide less funding from development		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+ Provides funds for conservation	+ Provides funds for conservation		- May provide less funding from development		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Provides funds for conservation	+ Provides funds for conservation		- May provide less funding from development		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	+ Provides funds for conservation	+ Provides funds for conservation		- May provide less funding from development		
<b>HW1. To improve the health of those most in need</b>	++ May require on-site services in some developments, encouraging walking/cycling and allows for open space, sport/recreation provision	++ May require on-site services in some developments, encouraging walking/cycling and allows for open space, sport/recreation provision		- May provide less funding from development		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	++ Allows for open space provision and funds for communities and culture	++ Allows for open space provision and funds for communities and culture		- May provide less funding from development		
<b>ER1. To reduce poverty and social exclusion</b>	+ May require on-site services in some developments	+ May require on-site services in some developments				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Provides funding for economic development	- May make it more difficult to fund large infrastructure projects		- May provide less funding from development		
<b>ER3. To help meet the housing requirements for the whole community</b>						
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Provides funding for economic development	- May make it more difficult to fund large infrastructure projects		- May provide less funding from development		
<b>ER5. To revitalise town centres</b>						
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ May require on-site services in some developments, reducing trip generation	+ May require on-site services in some developments, reducing trip generation				
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Provides funding for economic development	- May make it more difficult to fund large infrastructure projects		- May provide less funding from development		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	++ May require on-site education facilities in some developments and provides funds for education	++ May require on-site education facilities in some developments and provides funds for education		- May provide less funding from development		
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+ May provide funding for crime prevention	+ May provide funding for crime prevention				

<b>Core Strategy Policy Area 14: Affordable housing</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality						
ET2. To conserve soil resources and quality						
ET3. To reduce waste						
ET4. To reduce the effects of traffic upon the environment						
ET5. To improve access to key services for all sectors of the population						
ET6. To reduce contributions to climate change						
ET7. To reduce vulnerability to climatic events and increasing sea levels						
ET8. To conserve and enhance biodiversity						
ET9. To conserve and where appropriate enhance areas and sites of historical importance						
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes						
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs						
HW1. To improve the health of those most in need						
HW2. To improve the quality of life where people live and encourage community participation						
ER1. To reduce poverty and social exclusion	+ Provides affordable housing and rented accommodation	++ Provides higher level of affordable housing	? Does not say what different approach is	- May provide lower levels of affordable housing		
ER2. To offer everybody the opportunity for rewarding and satisfying employment						
ER3. To help meet the housing requirements for the whole community	+ Provides affordable housing and rented accommodation	++ Provides higher level of affordable housing	? Does not say what different approach is	- May provide lower levels of affordable housing		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area						
ER5. To revitalise town centres						
ER6. To encourage efficient patterns of movement in support of economic growth						
ER7. To encourage and accommodate both indigenous and inward investment						
CL1. To maintain and improve access to education and skills for both young people and adults						
CD1. To minimise potential opportunities for crime and anti-social activity						

<b>Core Strategy Policy Area 15: Number of jobs</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	- More jobs may mean more traffic	- Any levels of new jobs may increase traffic	- Not having a target may mean the necessary infrastructure (e.g. public transport) is not in place		
<b>ET2. To conserve soil resources and quality</b>	- Greenfield sites may be used for employment land	-- Higher job target will increase land consumption			
<b>ET3. To reduce waste</b>	- More economic activity may increase waste	- More economic activity may increase waste		+ Increasing number of businesses may make business waste disposal more economically viable	
<b>ET4. To reduce the effects of traffic upon the environment</b>	- More jobs may mean more traffic	- Any levels of new jobs may increase traffic	- Not having a target may mean the necessary infrastructure (e.g. public transport) is not in place		
<b>ET5. To improve access to key services for all sectors of the population</b>					
<b>ET6. To reduce contributions to climate change</b>	- More economic activity may mean more energy use	- More economic activity may mean more energy use			
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>					
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>					
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>					
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>				(P) Increased employment may improve health	
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	- Large amounts of in-migration may affect the community	- Large amounts of in-migration may affect the community			
<b>ER1. To reduce poverty and social exclusion</b>	++ Aims for 18,000 jobs	? Does not say what different target is			
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	++ Aims for 18,000 jobs	+ Will attract immigrants so not just catering for local needs			
<b>ER3. To help meet the housing requirements for the whole community</b>	- A large increase in jobs may result in housing shortages	- An increase in jobs may result in housing shortages			
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	++ Aims for 18,000 jobs	++ Aims to increase number of jobs			
<b>ER5. To revitalise town centres</b>				+ An increase in jobs may boost population, increasing the town centre's customer base	
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	- More jobs may mean more traffic	- Any levels of new jobs may increase traffic	- Not having a target may mean the necessary infrastructure (e.g. public transport) is not in place		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>			- Not having a target may mean the necessary infrastructure is not in place		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				? Depending on type of new jobs, may make training more accessible	
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				(P) Increased employment may reduce crime	

Core Strategy Policy Area 16	Preferred Option	Alternative 1	Alternative 2	Alternative 3	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	+ Knowing where growth sectors are allows better infrastructure (e.g. public transport) planning	- Not knowing where growth sectors are means worse infrastructure (e.g. public transport) planning	+ Knowing where growth sectors are allows better infrastructure (e.g. public transport) planning	? Uncertain what other breakdown may be		
ET2. To conserve soil resources and quality						
ET3. To reduce waste						
ET4. To reduce the effects of traffic upon the environment	+ Knowing where growth sectors are allows better infrastructure (e.g. public transport) planning	- Not knowing where growth sectors are means worse infrastructure (e.g. public transport) planning	+ Knowing where growth sectors are allows better infrastructure (e.g. public transport) planning	? Uncertain what other breakdown may be		
ET5. To improve access to key services for all sectors of the population						
ET6. To reduce contributions to climate change						
ET7. To reduce vulnerability to climatic events and increasing sea levels						
ET8. To conserve and enhance biodiversity						
ET9. To conserve and where appropriate enhance areas and sites of historical importance						
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes						
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs						
HW1. To improve the health of those most in need					(P, 2, 3) Increased employment may improve health	
HW2. To improve the quality of life where people live and encourage community participation						
ER1. To reduce poverty and social exclusion					(P, 2, 3) Increased employment may reduce poverty	
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+ Prepares for growth in majority of sectors	- Not breaking down target makes LDF development more difficult and may result in poorer planning	+ Prepares for growth in majority of sectors, but in more detail	? Uncertain what other breakdown may be		
ER3. To help meet the housing requirements for the whole community						
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area						
ER5. To revitalise town centres						
ER6. To encourage efficient patterns of movement in support of economic growth	+ Knowing where growth sectors are allows better infrastructure planning	- Not knowing where growth sectors are means worse infrastructure planning	+ Knowing where growth sectors are allows better infrastructure planning	? Uncertain what other breakdown may be		
ER7. To encourage and accommodate both indigenous and inward investment	+ Prepares for growth in majority of sectors	- Not breaking down target makes LDF development more difficult and may result in poorer planning	+ Prepares for growth in majority of sectors, but in more detail	? Uncertain what other breakdown may be		
CL1. To maintain and improve access to education and skills for both young people and adults	+ Enables forward planning of sectors					
CD1. To minimise potential opportunities for crime and anti-social activity					(P, 2, 3) Increased employment may reduce crime	

<b>Core Strategy Policy Area 17: Strategic employment sites</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+/- Site well served by bus services, but proximity to A14 may encourage road journeys	- If site was converted to housing, longer/more trips may be needed to reach alternative site	? No other site mentioned	? Depends on which site is allocated by other documents	(1) Lack of local employment for Ravenswood site could increase length of trips	
<b>ET2. To conserve soil resources and quality</b>	++ Strategic site is on PDL		? No other site mentioned	? Depends on which site is allocated by other documents		
<b>ET3. To reduce waste</b>						
<b>ET4. To reduce the effects of traffic upon the environment</b>	+/- Site well served by bus services, but proximity to A14 may encourage road journeys	- If site was converted to housing, longer/more trips may be needed to reach alternative site	? No other site mentioned	? Depends on which site is allocated by other documents	(1) Lack of local employment for Ravenswood site could increase length of trips	
<b>ET5. To improve access to key services for all sectors of the population</b>						
<b>ET6. To reduce contributions to climate change</b>						
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	+ Site is not in flood risk zone		? No other site mentioned	? Depends on which site is allocated by other documents		
<b>ET8. To conserve and enhance biodiversity</b>	++ Site does not encroach on any wildlife sites or protected species		? No other site mentioned	? Depends on which site is allocated by other documents		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	++ Site does not affect any Conservation Areas, listed buildings or archaeological sites		? No other site mentioned	? Depends on which site is allocated by other documents		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Site does not affect any Special Landscape Areas		? No other site mentioned	? Depends on which site is allocated by other documents		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>						
<b>HW1. To improve the health of those most in need</b>					(1) Not allocating a site may reduce economic growth, which boosts health	
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Would encourage redevelopment of run-down factory buildings					
<b>ER1. To reduce poverty and social exclusion</b>	+ Would provide new employment opportunities in a deprived part of Ipswich	-- Not allocating a site in Ipswich may harm local economy				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Well located in relation to major new development at Ravenswood	-- Not allocating a site in Ipswich may harm local economy		? Depends on which site is allocated by other documents		
<b>ER3. To help meet the housing requirements for the whole community</b>		+ Site may be used for housing				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>		-- Not allocating a site in Ipswich may harm local economy		? Depends on which site is allocated by other documents		
<b>ER5. To revitalise town centres</b>					(P) Could encourage growth of Ravenswood district centre and take business from town centre	
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+/- Site well served by bus services, but proximity to A14 may encourage road journeys	- If site was converted to housing, longer/more trips may be needed to reach alternative site	? No other site mentioned	? Depends on which site is allocated by other documents	(1) Lack of local employment for Ravenswood site could increase length of trips	
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Site is close to major transport route (A14)	-- Not allocating a site in Ipswich may harm local economy	? No other site mentioned	? Depends on which site is allocated by other documents		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>						
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>					(1) Not allocating a site may reduce economic growth, which could lower crime rate	



Core Strategy Policy Area 18	Preferred Option	Alternative 1	Alternative 2	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	++ Town centre development is preferred to out-of-town sites and supports improvements of local district centres	-- Supports out-of-town developments, leading to increase in traffic	-- Supports out-of-town developments, leading to increase in traffic		
ET2. To conserve soil resources and quality					
ET3. To reduce waste					
ET4. To reduce the effects of traffic upon the environment	++ Town centre development is preferred to out-of-town sites and supports improvements of local district centres	-- Supports out-of-town developments, leading to increase in traffic	-- Supports out-of-town developments, leading to increase in traffic		
ET5. To improve access to key services for all sectors of the population	+ Supports improvement of local district centres				
ET6. To reduce contributions to climate change					
ET7. To reduce vulnerability to climatic events and increasing sea levels					
ET8. To conserve and enhance biodiversity					
ET9. To conserve and where appropriate enhance areas and sites of historical importance					
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes					
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs					
HW1. To improve the health of those most in need				(P) Improved local economy may improve health of local residents	
HW2. To improve the quality of life where people live and encourage community participation					
ER1. To reduce poverty and social exclusion	+ Aiming to improve Ipswich as a retail centre may stop people shopping elsewhere and boost local economy				
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+ Aiming to improve Ipswich as a retail centre may stop people shopping elsewhere and boost local economy				
ER3. To help meet the housing requirements for the whole community					
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Aiming to improve Ipswich as a retail centre may stop people shopping elsewhere and boost local economy				
ER5. To revitalise town centres	++ Aims to protect and improve the town centre	-- Supporting out-of-town developments may damage town centre	-- Supporting out-of-town developments may damage town centre		
ER6. To encourage efficient patterns of movement in support of economic growth	++ Town centre development is preferred to out-of-town sites and supports improvements of local district centres	-- Supports out-of-town developments, leading to increase in traffic	-- Supports out-of-town developments, leading to increase in traffic		
ER7. To encourage and accommodate both indigenous and inward investment	+ Recognises that there are suitable sites in Ipswich centre for development				
CL1. To maintain and improve access to education and skills for both young people and adults					
CD1. To minimise potential opportunities for crime and anti-social activity				(P) Improved local economy may reduce crime rate	

<b>Core Strategy Policy Area 19: Non-residential planning gain tariff</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Alternative 4</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+/- Developers will need to resolve the issue of contaminated land and 25% of tariff is for the environment. But transport improvements may increase traffic			- Would not link tariff to growth need	0 Would not fund transport infrastructure improvements		
<b>ET2. To conserve soil resources and quality</b>	+ Notes that developers will need to resolve the issue of contaminated land						
<b>ET3. To reduce waste</b>							
<b>ET4. To reduce the effects of traffic upon the environment</b>	- Improved transport infrastructure may increase traffic			- Would not link tariff to growth need	0 Would not fund transport infrastructure improvements		
<b>ET5. To improve access to key services for all sectors of the population</b>							
<b>ET6. To reduce contributions to climate change</b>							
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>							
<b>ET8. To conserve and enhance biodiversity</b>	+ 25% of tariff will go towards the environment						
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>							
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>							
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	+ 25% of tariff will go towards the environment						
<b>HW1. To improve the health of those most in need</b>						(P) Improved economy may improve health of population	
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Not-for-profit community developments will not have to pay tariff						
<b>ER1. To reduce poverty and social exclusion</b>	+ Not-for-profit community developments will not have to pay tariff						
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ 25% of tariff will go towards major capital projects associated with growth	- May make funds more difficult for major or infrastructure projects			- May be less funds for infrastructure projects		
<b>ER3. To help meet the housing requirements for the whole community</b>							
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ 25% of tariff will go towards major capital projects associated with growth	- May make funds more difficult for major or infrastructure projects		- Would not link tariff to growth need	- May make funds more difficult for major or infrastructure projects		
<b>ER5. To revitalise town centres</b>							
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	- Improved transport infrastructure may increase traffic			- Would not link tariff to growth need	0 Would not fund transport infrastructure improvements		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ 50% of tariff will be used for developing transport infrastructure	- May make funds more difficult for major or infrastructure projects			- May make funds more difficult for major or infrastructure projects		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>							
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>						(P) Improved economy may lower crime rate	

<b>Core Strategy Policy Area 20: Education provision</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+/- Recognises importance of sustainable location, but new sixth form centre may generate more traffic and no mention of sustainable travel plans	0 Education not included in core strategy	+ Another school in north Ipswich may reduce trip generation/trip length		
<b>ET2. To conserve soil resources and quality</b>	- New sixth form centre will be built on greenfield land		- New school may be built on greenfield land		
<b>ET3. To reduce waste</b>				(P) + Improved education levels increase recycling rate	
<b>ET4. To reduce the effects of traffic upon the environment</b>	+/- Recognises importance of sustainable location, but new sixth form centre may generate more traffic and no mention of sustainable travel plans	0 Education not included in core strategy	+ Another school in north Ipswich may reduce trip generation/trip length	(1) - Loss of role in encouraging sustainable transport	
<b>ET5. To improve access to key services for all sectors of the population</b>			+ Will improve access to education in north Ipswich		
<b>ET6. To reduce contributions to climate change</b>	+ Building schools for the future refurbishments may reduce energy use				
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>	- New sixth form centre may damage protected species	0 Education not included in core strategy	- New school may be built on location of protected species		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	- New sixth form centre may damage archaeological site	0 Education not included in core strategy	- New school may be built on archaeological site		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>					
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>			+ Another school in north Ipswich may allow more pupils to walk/cycle to school	(P) + Increased education levels improve health	
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Recognises importance of nursery and children centre provision	0 Education not included in core strategy		(P) + Increased education levels improve community participation	
<b>ER1. To reduce poverty and social exclusion</b>	+ Better education offers better employment opportunities	0 Education not included in core strategy	+ Would create new jobs in north Ipswich		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Better education offers better employment opportunities	0 Education not included in core strategy	+ Would create new jobs in north Ipswich		
<b>ER3. To help meet the housing requirements for the whole community</b>					
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Improved education will benefit local economy	0 Education not included in core strategy			
<b>ER5. To revitalise town centres</b>					
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+/- Recognises importance of sustainable location, but new sixth form centre may generate more traffic and no mention of sustainable travel plans	0 Education not included in core strategy	+ Another school in north Ipswich may reduce trip generation/trip length		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Improved education of local population will increase attractiveness for investors	0 Education not included in core strategy			
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	++ Supports development of Suffolk New College, UCS and new sixth form centre	0 Education not included in core strategy	+/- Smaller schools may increase educational attainment, but might have problems offering a range of courses		
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+ Improved education may reduce crime/anti-social activity rate	0 Education not included in core strategy			

<b>Core Strategy Policy Area 21: Green corridors</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Green corridors are good for maintaining air quality	- Green corridors may be lost to development		(1, 2) - May lead to gradual erosion of resources as they are lost to development	(1, 2) Short term - little change, long-term change as land lost to development
<b>ET2. To conserve soil resources and quality</b>	++ Green corridors conserve soil resources	- Land may be lost to development			
<b>ET3. To reduce waste</b>					
<b>ET4. To reduce the effects of traffic upon the environment</b>					
<b>ET5. To improve access to key services for all sectors of the population</b>					
<b>ET6. To reduce contributions to climate change</b>					
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>	+ Aims to create a rim of greenspace around the town	- No policy means less protection of greenspace	0 No policy		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>		- No policy means less protection of greenspace			
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>		- No policy means less protection of greenspace			
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	+ May improve situation of surrounding SSSI/SPAs				
<b>HW1. To improve the health of those most in need</b>	+ Aims to protect publicly accessible greenspace	0 No policy			
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Aims to protect publicly accessible greenspace	0 No policy			
<b>ER1. To reduce poverty and social exclusion</b>					
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>					
<b>ER3. To help meet the housing requirements for the whole community</b>					
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					
<b>ER5. To revitalise town centres</b>					
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>					
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				+ Green environment can encourage certain types of investment	
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	+ Greenspace is an educational resource				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>					

<b>Core Strategy Policy Area 22: Open space</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality						
ET2. To conserve soil resources and quality	- 10% requirement may result in more land being needed for development	+ Would reduce amount of land needed for development	? Does not state what alternative figure could be	- 10% requirement may result in more land being needed for development		
ET3. To reduce waste						
ET4. To reduce the effects of traffic upon the environment						
ET5. To improve access to key services for all sectors of the population						
ET6. To reduce contributions to climate change						
ET7. To reduce vulnerability to climatic events and increasing sea levels						
ET8. To conserve and enhance biodiversity	+ Requires major development s to provide public green space	0 Would be no greenspace	? Does not state what alternative figure could be	0 New space may not be “green”		
ET9. To conserve and where appropriate enhance areas and sites of historical importance						
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Public space could enhance townsapce	- May reduce greenspace in townscape		0 New space may not be “green”		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs						
HW1. To improve the health of those most in need	+ Requires major developments to provide public green space	- Would be no greenspace	? Does not state what alternative figure could be	0 New space may not be “green”		
HW2. To improve the quality of life where people live and encourage community participation	+ Requires major developments to provide public green space	- Would be no greenspace	? Does not state what alternative figure could be	0 New space may not be “green”		
ER1. To reduce poverty and social exclusion						
ER2. To offer everybody the opportunity for rewarding and satisfying employment						
ER3. To help meet the housing requirements for the whole community						
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area						
ER5. To revitalise town centres						
ER6. To encourage efficient patterns of movement in support of economic growth						
ER7. To encourage and accommodate both indigenous and inward investment						
CL1. To maintain and improve access to education and skills for both young people and adults						
CD1. To minimise potential opportunities for crime and anti-social activity						

<b>Core Strategy Policy Area 23: Flooding</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality						
ET2. To conserve soil resources and quality	+ Enables use of PDL in floodplain in the short-term	+ May ensure supply of PDL for development	- May mean greenfield land is needed to replace land temporarily lost to flood risk zones	-- Would mean greenfield land needed to replace land lost to flood risk zones		(2) Short-medium term blocking of development
ET3. To reduce waste						
ET4. To reduce the effects of traffic upon the environment						
ET5. To improve access to key services for all sectors of the population						
ET6. To reduce contributions to climate change						
ET7. To reduce vulnerability to climatic events and increasing sea levels	++ Recognises importance of flood defence strategy and aims for tidal surge barrier	- May ignore risk of flooding	+ Would ensure flood risk is not increased	++ Would ensure flood risk is not increased	(1) + Encourages innovative design to deal with flood risk	(1) Short term potential risk of more development in flood risk area
ET8. To conserve and enhance biodiversity			+ Leaving land derelict may be good for biodiversity	+ Derelict land is good for biodiversity		
ET9. To conserve and where appropriate enhance areas and sites of historical importance						
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				- May result in derelict land/buildings around the river		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs					(P) -Barrier may affect SAC downstream	
HW1. To improve the health of those most in need					(2, 3) - Damaging local economy may worsen health	
HW2. To improve the quality of life where people live and encourage community participation	- Possible fear of flooding if development goes ahead without barrier	- Possible fear of flooding if development goes ahead without barrier			(P) - Cumulative effect of worsening flood risk made by increased amount of housing in flood plain (3) + Alternative use of land in flood plain could be greenspace	
ER1. To reduce poverty and social exclusion	- Endangers residents to flooding and loss of value of home	- Puts people and property at risk and has insurance issues	0 No change to risk	-- Restricting supply of employment land may damage local economy		(2) Short-medium term restriction on supply of employment land may damage local economy
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+ Enables development of employment land in flood zone			-- Restricting supply of employment land may damage local economy		(2) Short-medium term restriction on supply of employment land may damage local economy
ER3. To help meet the housing requirements for the whole community	+ Enables development for housing	+ Makes land available for housing	- Would restrict supply of land for housing	-- Would permanently restrict supply of land for housing		(2) Short-medium term blocking of development
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area		+ Land in flood risk zone may be available for development		-- Restricting supply of employment land may damage local economy	(2) - Derelict land may act as a disincentive to investment	(2) Short-medium term restriction on supply of employment land may damage local economy
ER5. To revitalise town centres						
ER6. To encourage efficient patterns of movement in support of economic growth						
ER7. To encourage and accommodate both indigenous and inward investment	+Recognises importance of protecting IP-One	+ May allow more land to be used for employment	- Would restrict supply of employment land	-- Would permanently restrict supply of employment land	(2) - Derelict land may act as a disincentive to investment	(2) Short-medium term blocking of development
CL1. To maintain and improve access to education and skills for both young people and adults						
CD1. To minimise potential opportunities for crime and anti-social activity			+ Leaving land derelict may create more anti-social activity	- May result in derelict land/buildings around the river	(2, 3) - Damaging local economy may increase crime	(2) Short-medium term may result in derelict land/buildings around the river

<b>Core Strategy Policy Area 24: Health services</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Heath Road is well served by public transport	0 Issue not addressed	+ New GP surgeries may result in less need for travel		
<b>ET2. To conserve soil resources and quality</b>	+ St Clements being made available for development may reduce need for greenfield land	0 Issue not addressed			
<b>ET3. To reduce waste</b>	-				
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Heath Road is well served by public transport	0 Issue not addressed	+ New GP surgeries may result in less need for travel		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ St Clements site has key services nearby for new housing	0 Issue not addressed	+ Would propose new GP surgeries		
<b>ET6. To reduce contributions to climate change</b>					
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>	-- May disturb habitat of protected species and result in loss of greenspace	0 Issue not addressed			
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>					
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>					
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>	+/- Provides integrated mental and physical health facilities, but may result in greenspace being developed	0 Issue not addressed	+ Would propose new GP surgeries		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	-- May result in community facilities and greenspace being developed	0 Issue not addressed			
<b>ER1. To reduce poverty and social exclusion</b>					
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>			0/+ May result in small increase in employment		
<b>ER3. To help meet the housing requirements for the whole community</b>	+ St Clements site may be available for development for housing	0 Issue not addressed			
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					
<b>ER5. To revitalise town centres</b>					
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Heath Road is better served by public transport	0 Issue not addressed	+ New GP surgeries may result in less need for travel		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>					
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>					

<b>Core Strategy Policy Area 25: Waterfront and town centre transport</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	- Supports more road building, though also supports improvements to bus provision	-- Supports road building and no support for public transport	+ Supports reduction of road capacity	- As Ipswich grows, traffic and congestion will worsen if nothing is done	(P) No short-term effects as Wet Dock crossing is medium- long term target	
<b>ET2. To conserve soil resources and quality</b>						
<b>ET3. To reduce waste</b>						
<b>ET4. To reduce the effects of traffic upon the environment</b>	- Supports more road building, though also supports improvements to bus provision	-- Supports road building and no support for public transport	+ Supports reduction of road capacity	- As Ipswich grows, traffic and congestion will worsen if nothing is done	(P) No short-term effects as Wet Dock crossing is medium- long term target	
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Changes to Star Lane may improve access to town centre for Waterfront residents		+ Changes to Star Lane may improve access to town centre for Waterfront residents			
<b>ET6. To reduce contributions to climate change</b>						
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>						
<b>ET8. To conserve and enhance biodiversity</b>	- Wet Dock crossing may damage wildlife site					
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	- Wet Dock crossing may damage Conservation Area		+ Reducing Key Street to a single lane may help preserve buildings		(P) No short-term effects as Wet Dock crossing is medium- long term target (3) In the long-term, high traffic levels may damage listed buildings on Key Street	
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	- Wet Dock crossing may damage townscape		+ Reducing Key Street and Star Lane to a single lane may improve townscape			
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>						
<b>HW1. To improve the health of those most in need</b>						
<b>HW2. To improve the quality of life where people live and encourage community participation</b>						
<b>ER1. To reduce poverty and social exclusion</b>						
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Improved road links may improve attractiveness to investment		- Worsened road links may prove disincentive to investment			
<b>ER3. To help meet the housing requirements for the whole community</b>						
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Improved road links may improve attractiveness to investment		- Worsened road links may prove disincentive to investment			
<b>ER5. To revitalise town centres</b>						
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	- Supports more road building, though also supports improvements to bus provision	-- Supports road building and no support for public transport	+ Supports reduction of road capacity	- As Ipswich grows, traffic and congestion will worsen if nothing is done	(P) No short-term effects as Wet Dock crossing is medium- long term target	
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Improved road links may improve attractiveness to investment		- Worsened road links may prove disincentive to investment			
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>						
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>						



<b>Core Strategy Policy Area 26: The A14</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	-- Supports increase in road capacity and road building	0 No support for northern bypass	- Supports road building, though may encourage use of port		
<b>ET2. To conserve soil resources and quality</b>	-- New northern bypass will use greenfield sites	0 No support for northern bypass	- Will use greenfield land		
<b>ET3. To reduce waste</b>					
<b>ET4. To reduce the effects of traffic upon the environment</b>	-- Supports increase in road capacity and road building	0 No support for northern bypass	- Supports road building, though may encourage use of port		
<b>ET5. To improve access to key services for all sectors of the population</b>					
<b>ET6. To reduce contributions to climate change</b>					
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>	- Wet Dock crossing may damage wildlife site	0 No support for Wet Dock crossing	-- New East Bank link road will go through large wildlife site and may damage adjacent SSSI/SPA		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	-- Supports possibility of northern bypass, which may damage archaeological sites and Wet Dock crossing may damage conservation area	0 No support for northern bypass	-- New East Bank link road will go through archaeological site		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	-- Supports possibility of northern bypass, which may damage landscape and SLA	0 No support for northern bypass	- May damage nearby AONB		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>			-- New East Bank link road will go through large wildlife site and may damage adjacent SSSI/SPA		
<b>HW1. To improve the health of those most in need</b>					
<b>HW2. To improve the quality of life where people live and encourage community participation</b>					
<b>ER1. To reduce poverty and social exclusion</b>				(P) + Boosting local economy may improve local health	
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	++ Northern bypass and Wet Dock crossing may reduce travel times and boost local economy	0 No support for northern bypass		(1) – In long-term, no increase in road capacity in Ipswich may constrain development	
<b>ER3. To help meet the housing requirements for the whole community</b>					
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	++ Northern bypass and Wet Dock crossing may reduce travel times and boost local economy	0 No support for northern bypass	+ May improve access to port	(1) – In long-term, no increase in road capacity in Ipswich may constrain development	
<b>ER5. To revitalise town centres</b>					
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	-- Supports increase in road capacity and road building	0 No support for northern bypass	- Supports road building, though may encourage use of port		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	++ Northern bypass and Wet Dock crossing may reduce travel times and boost local economy	0 No support for northern bypass	+ Will increase access to the port	(1) – In long-term, no increase in road capacity in Ipswich may constrain development	
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				(P) + Boosting local economy may reduce crime	

<b>Core Strategy Policy Area 27: Electricity capacity</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality	+ Uses PDL	0 Issue not addressed		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	- May result in more energy usage	0 Issue not addressed		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance	- May damage surrounding Conservation Area	0 Issue not addressed		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Will use PDL	0 Issue not addressed		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Will increase electricity capacity of town centre	- Case by case could delay or lose development		
ER5. To revitalise town centres	+ Will increase electricity capacity of town centre	0 Issue not addressed		
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	+ Will increase electricity capacity of town centre	- Case by case could delay or lose development		
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy Area 28: Carbon footprint</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality						
ET2. To conserve soil resources and quality						
ET3. To reduce waste						
ET4. To reduce the effects of traffic upon the environment	+ Aims to reduce the need for travel	- Less consistent approach to sustainable transport provision				
ET5. To improve access to key services for all sectors of the population						
ET6. To reduce contributions to climate change	++ Aims to set carbon emissions targets and for a simple approach, but does not say what targets are, and supports renewable energy	-- No co-ordinated action to seek to reduce energy use	? Policy is unclear ("to focus on one aspect of the sustainability agenda"); carbon footprint is one aspect	? Does not say what specific targets may be		
ET7. To reduce vulnerability to climatic events and increasing sea levels						(P) + In the long term, reducing carbon emissions will reduce vulnerability to climatic events
ET8. To conserve and enhance biodiversity						
ET9. To conserve and where appropriate enhance areas and sites of historical importance						
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes						
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs						
HW1. To improve the health of those most in need						
HW2. To improve the quality of life where people live and encourage community participation						
ER1. To reduce poverty and social exclusion						
ER2. To offer everybody the opportunity for rewarding and satisfying employment						
ER3. To help meet the housing requirements for the whole community						
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area						
ER5. To revitalise town centres						
ER6. To encourage efficient patterns of movement in support of economic growth	+ Aims to locate housing and employment close together					
ER7. To encourage and accommodate both indigenous and inward investment						
CL1. To maintain and improve access to education and skills for both young people and adults						
CD1. To minimise potential opportunities for crime and anti-social activity						

<b>Core Strategy Policy Area 29: Flooding and sustainable urban drainage</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	+ Reducing impact on drainage system means less risk of overflow and river pollution	0 Does not address issue		
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels	++ Aims to address issues in SFRA and minimise impact on drainage system	0 Does not address issue		
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	+ Allows development under certain conditions			
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Allows development under certain conditions			
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	+ Allows development under certain conditions			
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy Area 30: Urban design policy</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	++ Aims to retain key features on site, e.g. trees			
ET9. To conserve and where appropriate enhance areas and sites of historical importance	++ Aims to retain key features and seek better standards of design	-/0 Does not address issue		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++ Recognises key features of townscape and aims to preserve them, limits tall buildings	-/0 Does not address issue		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	+ Improved public spaces may encourage people to walk/cycle	0 Does not address issue		
HW2. To improve the quality of life where people live and encourage community participation	+ Aims to positively contribute to public spaces	-/0 Does not address issue		
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres	+ Seeks higher design standards			
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment			(P) Higher design standards may make Ipswich more attractive to investors	
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy Area 31: Protecting our assets</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	+ Aims for a protection for the natural environment	0 Does not address issue		
ET2. To conserve soil resources and quality	+ Aims for a protection for the natural environment	0 Does not address issue		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	+ Aims for a protection for the natural environment	- May lead to loss of local assets		
ET9. To conserve and where appropriate enhance areas and sites of historical importance	+ Aims for a protection policy for historic environment	- May lead to loss of local assets		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Aims for a protection policy for built environment	- May lead to loss of local assets		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	+ Aims for a protection for the natural environment	0 Does not address issue		
HW1. To improve the health of those most in need	+ Protecting the natural environment may encourage more people to walk	0 Does not address issue	(P) Hampering development may adversely affect health	
HW2. To improve the quality of life where people live and encourage community participation	+ Aims for a protection for the natural environment	- Loss of locally important assets will degrade community		
ER1. To reduce poverty and social exclusion		- Loss of locally important assets may make people feel excluded		
ER2. To offer everybody the opportunity for rewarding and satisfying employment	- May hamper development			
ER3. To help meet the housing requirements for the whole community	- May hamper development	0 Does not address issue		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	- May hamper development	0 Does not address issue		
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	- May hamper development	0 Does not address issue		
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity			(P) Hampering development may adversely affect crime levels	

<b>Core Strategy Policy Area 32: Small scale residential development</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	- Aims for parking facilities	- Allows surface run-off, which may lead to river pollution	(P) May prevent surface run- off, damaging groundwater	
ET2. To conserve soil resources and quality				
ET3. To reduce waste	-- Does not seek waste reduction or ensure recycling provision.			
ET4. To reduce the effects of traffic upon the environment	- Aims for parking facilities	- Aims for parking		
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	-- Does not seek energy minimisation	-- Does not seek energy minimisation		
ET7. To reduce vulnerability to climatic events and increasing sea levels	+ Aims to prevent surface run- off, which can contribute to flooding	- Allows surface run-off		
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Aims for well-designed housing	0 Does not address issue		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	++ Seeks to ensure outdoor amenity space and to ensure no sunlight/daylight impact	0 Does not address issue		
ER1. To reduce poverty and social exclusion	? Not concerned about increasing numbers living in areas of high deprivation			
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	+ Provides housing			
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth	- Aims for parking facilities	0 Does not address issue		
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity	+ Aims to establish a safe and secure environment	0 Does not address issue		

<b>Core Strategy Policy Area 33: Bedsits/other houses in multiple occupation</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+/- Aims to introduce more cycle parking but also seeks sufficient car parking	0 Does not address issue	+/- Aims to introduce more cycle parking but also seeks sufficient car parking		
<b>ET2. To conserve soil resources and quality</b>					
<b>ET3. To reduce waste</b>	+ Aims to ensure sufficient bin space for recycling		+ Aims to ensure sufficient bin space for recycling		
<b>ET4. To reduce the effects of traffic upon the environment</b>	+/- Aims to introduce more cycle parking but also seeks sufficient car parking	0 Does not address issue	+/- Aims to introduce more cycle parking but also seeks sufficient car parking		
<b>ET5. To improve access to key services for all sectors of the population</b>	? Assumes access to basic services		? Assumes access to basic services		
<b>ET6. To reduce contributions to climate change</b>	- No encouragement for microrenewables		- Small groupings, so renewable energy less viable		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>					
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	++ Aims to protect listed buildings and conservation areas	0 Does not address issue	++ Aims to protect listed buildings and conservation areas		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>					
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>	+/- Aims to introduce more cycle parking but also seeks sufficient car parking	0 Does not address issue	+/- Aims to introduce more cycle parking but also seeks sufficient car parking		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Aims to ensure sufficient amenity space	0 Does not address issue	+ Aims to ensure sufficient amenity space		
<b>ER1. To reduce poverty and social exclusion</b>	- May allow development in highly deprived areas		- May allow development in highly deprived areas		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>					
<b>ER3. To help meet the housing requirements for the whole community</b>	+ Aims to prevent loss of houses with 3 or less bedrooms	- May result in the loss of larger family homes	+ Retains mix of housing across streets		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					
<b>ER5. To revitalise town centres</b>					
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+/- Aims to introduce more cycle parking but also seeks sufficient car parking	0 Does not address issue	+/- Aims to introduce more cycle parking but also seeks sufficient car parking		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>					
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+ Preventing overload minimises disturbance from anti-social activity	- Overload may lead to anti-social behaviour	+ Preventing overload minimises disturbance from anti-social activity		



<b>Core Strategy Policy Area 34: Travel demand management</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	+ Aims to reduce car travel and undertake assessment of air quality	-- Worsening air quality in AQMAs due to traffic growth		
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	+ Aims to reduce car travel	-- Encourages traffic growth		
ET5. To improve access to key services for all sectors of the population		- No encouragement to public transport to improves access to services	(P) Travel plans should promoted public transport and facilitate travel to services	
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	+ Reducing car travel may encourage more people to walk/cycle	- Respiratory health issues associated with traffic growth and AQMAs		
HW2. To improve the quality of life where people live and encourage community participation	+ Aims to assess noise impacts	- Traffic reduces quality of life		
ER1. To reduce poverty and social exclusion		- Encourages car ownership, so excludes non-car owners		
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area			(1) - Congestion could hamper economic growth	
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth	+ Aims to reduce car travel	0 Does not address issue		
ER7. To encourage and accommodate both indigenous and inward investment			(1) - Congestion could hamper economic growth	
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy Area 35: Parking</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	+ Aims to limit car parking in town centre and have minimum standards of cycle parking	? Does not say what radically alternative policy is		
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	+ Aims to limit car parking in town centre and have minimum standards of cycle parking	? Does not say what radically alternative policy is		
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	+ May encourage more people to walk or cycle	? Does not say what radically alternative policy is		
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth	+ Aims to limit car parking in town centre and have minimum standards of cycle parking	? Does not say what radically alternative policy is		
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy Area 36: Proposals in retail areas</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Support for local facilities may reduce need to travel	- Could increase traffic as people travel to dispersed shops		
<b>ET2. To conserve soil resources and quality</b>				
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Support for local facilities may reduce need to travel	- Could increase traffic as people travel to dispersed shops		
<b>ET5. To improve access to key services for all sectors of the population</b>	++ Supports community facilities in district centres	0 Could lead to dispersed facilities with restricted choice of access		
<b>ET6. To reduce contributions to climate change</b>				
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>				
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>				
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>				
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+ Support for local facilities may encourage people to walk/cycle to them	0 Fewer facilities will not encourage walking/cycling		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>		- Dispersed facilities increases travel and takes more time to reach		
<b>ER1. To reduce poverty and social exclusion</b>				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Supports local facilities and town centre	+ Disperses employment opportunities		
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Supports local facilities and town centre	+ Disperses employment opportunities		
<b>ER5. To revitalise town centres</b>	+ Aims to boost town centre	- Could lead to more dispersed facilities		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Support for local facilities may reduce need to travel	- Could increase traffic as people travel to dispersed shops		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

<b>Core Strategy Policy Area 37: Loss of housing units</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment		? Could allow employment to move closer to housing		
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change			+ Change could lead to replace of inefficient units with more efficient energy use	
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity		- Possible loss of biodiversity if gardens are lost to employment development		
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Mainly retains existing housing			
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	++ May increase number of community facilities	0 Does not address issue		
ER1. To reduce poverty and social exclusion	+ May increase number of community facilities	0 Does not address issue		
ER2. To offer everybody the opportunity for rewarding and satisfying employment		+ Provides sites for employment		
ER3. To help meet the housing requirements for the whole community	-/0 May reduce number of houses available, though not if they meet demand	- Housing stock reduction		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area		+ Provides sites for employment		
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment		+ Provides sites for employment		
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity	+ May increase number of community facilities	0 Does not address issue		

<b>Core Strategy Policy Area 38: Affordable housing</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	++ Ensures mix of types of affordable housing for different family sizes	0 Does not address issue		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>IP1 Policy Area 42: Town centre boundary</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Locating employment in town centre is preferable to on the outskirts in terms of traffic generation	- Dispersal of employment could lead to longer trips	+ Locating employment in town centre is preferable to on the outskirts in terms of traffic generation		
<b>ET2. To conserve soil resources and quality</b>	+ Encourages use of PDL				
<b>ET3. To reduce waste</b>					
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Locating employment in town centre is preferable to on the outskirts in terms of traffic generation	- Dispersal of employment could lead to longer trips	+ Locating employment in town centre is preferable to on the outskirts in terms of traffic generation		
<b>ET5. To improve access to key services for all sectors of the population</b>					
<b>ET6. To reduce contributions to climate change</b>					
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	- Will encourage development in flood risk zones	+ Development may disperse to flood risk areas	? Does not say how boundary might be extended differently		
<b>ET8. To conserve and enhance biodiversity</b>	- Development of Northern and Eastern Quays may damage protected species habitat	0 No different to present approach	? Does not say how boundary might be extended differently		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	- Development of Northern and Eastern Quays may damage Conservation Area	0 No different to present approach	? Does not say how boundary might be extended differently		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>		+ Development may go o suburbs			
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>				(P, 2) + Providing more employment land may boost economy and improve health	
<b>HW2. To improve the quality of life where people live and encourage community participation</b>					
<b>ER1. To reduce poverty and social exclusion</b>	+ Will provide employment land	0 No different to present approach	+ May provide more employment land		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Will provide employment land	0 No different to present approach	+ May provide more employment land		
<b>ER3. To help meet the housing requirements for the whole community</b>	- May reduce housing land availability	-- May reduce housing land in suburbs	- May reduce housing land availability		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ May provide more employment opportunities	0 No different to present approach	+ May provide more employment land		
<b>ER5. To revitalise town centres</b>	+ Will enlarge town centre	0 No different to present approach	+ Will enlarge town centre		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Locating employment in town centre is preferable to on the outskirts in terms of traffic generation	- Less efficient patterns of movement	+ Locating employment in town centre is preferable to on the outskirts in terms of traffic generation		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ May provide more employment land	0 No different to present approach	+ May provide more employment land		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	+ Education quarter included in central planning	- Education quarter may not benefit from town centre accessibility arrangements			
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>		- Dispersed facilities may be difficult to police		(P, 2) + Providing more employment land may boost economy and reduce crime rate	

<b>IP1 Policy Area 43: Site allocations for employment use</b>	<b>Preferred Option</b>	<b>Alternative 1: No Allocation</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	-/0 Sites generally in good central locations in close proximity to cycle paths, however frequent location in AQMA's.			
<b>ET2. To conserve soil resources and quality</b>	++ Majority of sites are brownfield.			
<b>ET3. To reduce waste</b>	- More development means more waste			
<b>ET4. To reduce the effects of traffic upon the environment</b>	-/0 More development means more traffic, but significant redevelopment with proximity to cycle paths in central areas.			Some sites are large and central enough to cause short term traffic issues throughout the construction period; these will need to be addressed.
<b>ET5. To improve access to key services for all sectors of the population</b>				
<b>ET6. To reduce contributions to climate change</b>	- More employment space will use more energy			
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	-- Frequently proposals for flood zones.			Risk of flood damage until strategic approach to flood risk is undertaken.
<b>ET8. To conserve and enhance biodiversity</b>	- Potential for BAP species and habitats on all sites			Potential long term, permanent loss of species and habitats.
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	- Frequent proposals on archaeological sites			
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+/0 Significant opportunities to redevelop and improve character of area			
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	- Frequent concerns regarding landfill sites			
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Community and leisure facilities proposed along with employment sites should provide an environment in which communities can live.			
<b>ER1. To reduce poverty and social exclusion</b>	++ Significant new employment space will create jobs, some sites are located in deprived areas according to IMD 2007.			
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	++ Significant increase in employment space should lead to more jobs.	- Will not increase employment		
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	++ Significant increase in employment space should help lead to increase economic growth.	- Will not encourage economic growth		
<b>ER5. To revitalise town centres</b>	++ Many sites are brownfield, located within the town centre. Also mention of landmark buildings.	- No increased employment capacity may damage town centre		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Cycle paths and localised employment spaces are frequent.			
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Employment space should help encourage this.	- No increased employment capacity will not encourage investment		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	0/+ Increased employment spaces may provide links to education			
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	, potential to worsen or improve.			

<b>IP1 Policy Area 44: Hotels</b>	<b>Preferred Option</b>	<b>Alternative 1: Allow market to dictate development</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	- Development in AQMA proposed	? Unsure where market may prefer development		
<b>ET2. To conserve soil resources and quality</b>				
<b>ET3. To reduce waste</b>	- Development will produce more waste	? Unsure where market may prefer development		
<b>ET4. To reduce the effects of traffic upon the environment</b>	-/0 Potential for traffic increase	? Unsure where market may prefer development		
<b>ET5. To improve access to key services for all sectors of the population</b>				
<b>ET6. To reduce contributions to climate change</b>	- More development will use more energy	? Unsure where market may prefer development		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	-- Both sites proposed are on flood plains	? Unsure where market may prefer development		Risk of flood damage until strategic approach to flood risk is undertaken.
<b>ET8. To conserve and enhance biodiversity</b>	- Potential for BAP species and habitats on all sites	? Unsure where market may prefer development		Potential long term, permanent loss of species and habitats.
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	- One site proposed on archaeological site	? Unsure where market may prefer development		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	0/+ Potential to improve area through redevelopment of PDL	? Unsure where market may prefer development		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>				
<b>HW2. To improve the quality of life where people live and encourage community participation</b>				
<b>ER1. To reduce poverty and social exclusion</b>	0 / + Potential for jobs increase	? Unsure where market may prefer development		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	0 / + Potential for jobs increase	? Unsure where market may prefer development		
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	0/+ Potential for jobs increase and economic growth	? Unsure where market may prefer development		
<b>ER5. To revitalise town centres</b>	+ Potential to attract people to the town centre whilst redeveloping, with mention of landmark buildings	? Unsure where market may prefer development		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>				
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	0 Potential to worsen or alleviate crime	? Unsure where market may prefer development		



<b>IP1 Policy Area 45: Leisure developments</b>	<b>Preferred Option</b>	<b>Alternative 1 – No Allocations</b>	<b>Alternative 2 – Alternative Sites</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>		0 No Impact	? Unsure where alternative sites may be		
<b>ET2. To conserve soil resources and quality</b>	+ Derelict and brownfield sites are proposed	0 No Impact	? Unsure where alternative sites may be		
<b>ET3. To reduce waste</b>	- Increased developing will increase waste	0 No Impact	? Unsure where alternative sites may be		
<b>ET4. To reduce the effects of traffic upon the environment</b>	- Attracting people to leisure facilities will increase traffic, to sites mostly in central Ipswich	0 No Impact	? Unsure where alternative sites may be		Some sites are large and central enough to cause short term traffic issues throughout the construction period; these will need to be addressed.
<b>ET5. To improve access to key services for all sectors of the population</b>					
<b>ET6. To reduce contributions to climate change</b>	- More development will use more energy	0 No Impact	? Unsure where alternative sites may be		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	-- Majority of sites are in flood zones	0 No Impact	? Unsure where alternative sites may be		Risk of flood damage until strategic approach to flood risk is undertaken.
<b>ET8. To conserve and enhance biodiversity</b>	- Potential for BAP species and habitats on all sites	0 No Impact	? Unsure where alternative sites may be		Potential long term, permanent loss of species and habitats.
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	- One site proposed on archaeological site	0 No Impact	? Unsure where alternative sites may be		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	0/+ Potential to improve area through redevelopment of PDL	0 No Impact	? Unsure where alternative sites may be		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>			? Unsure where alternative sites may be		
<b>HW1. To improve the health of those most in need</b>	+ Provision of leisure facilities should improve health.	0 No Impact	? Unsure where alternative sites may be		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Provision of community leisure facilities should increase participation	0 No Impact	? Unsure where alternative sites may be		
<b>ER1. To reduce poverty and social exclusion</b>	++ Creation of jobs and social facilities.	0 No Impact	? Unsure where alternative sites may be		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ May create new jobs	0 No Impact	? Unsure where alternative sites may be		
<b>ER3. To help meet the housing requirements for the whole community</b>					
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ May create new jobs	0 No Impact	? Unsure where alternative sites may be		
<b>ER5. To revitalise town centres</b>	+ Redevelopment on PDL close to town centre	0 No Impact	? Unsure where alternative sites may be		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ All sites close to good public transport links	0 No Impact	? Unsure where alternative sites may be		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>					
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+ Leisure facilities may reduce crime	0 No Impact	? Unsure where alternative sites may be		

<b>IP1 Policy Area 46: Protecting existing employment areas</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Protects centrally-located employment sites	- May result in employment sites moving to out-of-town locations		
<b>ET2. To conserve soil resources and quality</b>				
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Protects centrally-located employment sites	- May result in employment sites moving to out-of-town locations		
<b>ET5. To improve access to key services for all sectors of the population</b>				
<b>ET6. To reduce contributions to climate change</b>				
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>				
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>				
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>				
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>				
<b>HW2. To improve the quality of life where people live and encourage community participation</b>				
<b>ER1. To reduce poverty and social exclusion</b>				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Protects employment land	- May result in loss of employment land to housing		
<b>ER3. To help meet the housing requirements for the whole community</b>	- May constrain housing development	+ May provide more housing land in central Ipswich		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Protects employment land	- May result in loss of employment land to housing		
<b>ER5. To revitalise town centres</b>				
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Protects centrally-located employment sites	- May result in employment sites moving to out-of-town locations		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Protects employment land	- May result in loss of employment land to housing		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

<b>IP1 Policy Area 47: Residential and residential-led mixed- use allocations</b>	<b>Preferred Option: 100% Residential</b>	<b>Preferred Option: 80% Residential</b>	<b>Preferred Option: 50% Residential</b>	<b>Preferred Option: 20% Residential</b>	<b>Alternative 1 – Not allocating site</b>	<b>Secondary effects</b>	<b>Short, medium and long- term effects</b>
<b>ET1. To improve water and air quality</b>	0 / + Residential developments proposed in AQMA's, but preferable to employment and industry.	0 / + Residential developments proposed in AQMA's, but preferable to employment and industry.	- UC057 and UC001 located in AQMA.	0 Some sites in AQMA's but development likely to be improvement on current use.	0 No Impact		
<b>ET2. To conserve soil resources and quality</b>	+ Most sites are on PDL	+ Most sites are on PDL	+ Most sites are on PDL	+ Most sites are on PDL	0 No Impact		
<b>ET3. To reduce waste</b>	-- More housing will increase waste, sites also frequently significant distances from nearest household waste sites.	-- More housing will increase waste, sites also frequently significant distances from nearest household waste sites.	-- More housing will increase waste, sites also frequently significant distances from nearest household waste sites.	-- More housing will increase waste, sites also frequently significant distances from nearest household waste sites.	0 No Impact		
<b>ET4. To reduce the effects of traffic upon the environment</b>	- More housing results in more traffic	- More housing results in more traffic	- More housing results in more traffic	- More housing results in more traffic	0 No Impact		Some sites are large and central enough to cause short term traffic issues throughout the construction period; these will need to be addressed.
<b>ET5. To improve access to key services for all sectors of the population</b>	++ Good levels of service access generally	++ Good levels of service access generally	++ Good levels of service access generally	++ Good levels of service access generally	0 No Impact		
<b>ET6. To reduce contributions to climate change</b>	0 / - Potential for carbon neutral development, housing preferable to industry and employment	0 / - Potential for carbon neutral development, housing preferable to industry and employment	0 / - Potential for carbon neutral development, housing preferable to industry and employment	0 / - Potential for carbon neutral development, housing preferable to industry and employment	0 No Impact		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	- Sites very frequently located on flood plain	- Sites very frequently located on flood plain	- Sites very frequently located on flood plain	- Sites very frequently located on flood plain	0 No Impact		Risk of flood damage until strategic approach to flood risk is undertaken.
<b>ET8. To conserve and enhance biodiversity</b>	- Potential for BAP species and habitats on all sties	- Potential for BAP species and habitats on all sties	- Potential for BAP species and habitats on all sties	- Potential for BAP species and habitats on all sties	0 No Impact		Potential long term, permanent loss of species and habitats.
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	0 / - Sites frequently in proximity to archaeological sites	0 / - Sites frequently in proximity to archaeological sites	0 / - Sites frequently in proximity to archaeological sites	0 / - Sites frequently in proximity to archaeological sites	0 No Impact		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	0 Depends on design of development	0 Depends on design of development	- Two sites located within conservation areas (UC038 and UC001)	0 Depends on design of development	0 No Impact		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	0 No anticipated impact	0 No anticipated impact	0 No anticipated impact	0 No anticipated impact	0 No Impact		
<b>HW1. To improve the health of those most in need</b>	++ Good access to healthcare generally	++ Good access to healthcare generally	++ Good access to healthcare generally	++ Good access to healthcare generally	0 No Impact		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	0 Impact uncertain	0 Impact uncertain	0 Impact uncertain	0 Impact uncertain	0 No Impact		
<b>ER1. To reduce poverty and social exclusion</b>	0 Impact unknown; poverty could decrease, social exclusion could increase, depends on nature of development, type of occupant etc	0 Impact unknown; poverty could decrease, social exclusion could increase, depends on nature of development, type of occupant et	0 Impact unknown; poverty could decrease, social exclusion could increase, depends on nature of development, type of occupant et	0 Impact unknown; poverty could decrease, social exclusion could increase, depends on nature of development, type of occupant et	0 No Impact		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>					0 No Impact		
<b>ER3. To help meet the housing requirements for the whole community</b>	++ Housing Proposal will increase supply	++ Housing Proposal will increase supply	++ Housing Proposal will increase supply	++ Housing Proposal will increase supply	0 No Impact		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					0 No Impact		
<b>ER5. To revitalise town centres</b>	0 / + Some development proposed within or close to the town centre on derelict or PDL	0 / + Some development proposed within or close to the town centre on derelict or PDL	0 / + Some development proposed within or close to the town centre on derelict or PDL	0 / + Some development proposed within or close to the town centre on derelict or PDL	0 No Impact	+ Extra population may boost town centre	
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>					0 No Impact		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>					0 No Impact		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	++ Good access to healthcare generally	++ Good access to healthcare generally	++ Good access to healthcare generally	++ Good access to healthcare generally	0 No Impact		
<b>CD1. To minimise potential opportunities for crime and anti- social activity</b>	0 Development may alleviate crime, or increase potential targets, unknown impact.	0 Development may alleviate crime, or increase potential targets, unknown impact.	0 Development may alleviate crime, or increase potential targets, unknown impact.	0 Development may alleviate crime, or increase potential targets, unknown impact.	0 No Impact		

<b>IP1 Policy Area 48: Cultural facilities</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality		- May blight a brownfield site		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance	+ Use of island site may retain historic interest			
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	+ Seeks cultural development	+ Seeks cultural development		
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+ Aims for a cultural based 'attraction', which may increase tourism	- May earmark site which could be better used for employment		
ER3. To help meet the housing requirements for the whole community		- May earmark site which could be better used for housing		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Aims for a cultural based 'attraction', which may increase tourism	- May earmark site which could be better used for employment		
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment		- May earmark site which could be better used for employment		
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>IP1 Policy Area 49: Community facilities</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ New facilities may reduce trip generation	0 May result in no new facilities		
<b>ET2. To conserve soil resources and quality</b>				
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ New facilities may reduce trip generation	0 May result in no new facilities		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Seeks new primary school	0 May result in no new facilities		
<b>ET6. To reduce contributions to climate change</b>				
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>				
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>				
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>				
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+ New local facilities may encourage walking/cycling	0 May result in no new facilities		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Seeks new community centres at Holywells Road/Toller Road and Ranelagh Road	0 May result in no new facilities		
<b>ER1. To reduce poverty and social exclusion</b>				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ New facilities would mean more employment and possibly more tourism	0 May result in no new facilities		
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ New facilities would mean more employment and possibly more tourism	0 May result in no new facilities		
<b>ER5. To revitalise town centres</b>				
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ New facilities may reduce trip generation	0 May result in no new facilities		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	+ Seeks a new primary school at Duke Street	0 May result in no new facilities		
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+ New facilities may help reduce anti-social behaviour			

<b>IP1 Policy Area 50: Design and amenity in town centre living</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Aims for cycle storage and may encourage cycle use	- Lacks cycle space	+ Aims for cycle storage		
<b>ET2. To conserve soil resources and quality</b>					
<b>ET3. To reduce waste</b>	+ Aims for a bin storage area (assumed this includes space for recycling bins)	0 Policy not included	+ Aims for a bin storage area (assumed this includes space for recycling bins)		
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Aims for cycle storage and may encourage cycle use	- Lacks cycle space	+ Aims for cycle storage		
<b>ET5. To improve access to key services for all sectors of the population</b>					
<b>ET6. To reduce contributions to climate change</b>	- Roof space is not left available for renewable energy generation		- Roof space is not left available for renewable energy generation		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>					
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>					
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>					
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>	+ Aims for cycle storage and may encourage cycle use	- Lacks cycle space	+ Aims for cycle storage		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Aims for communal space	- Lacks communal space	+ Aims for communal space		
<b>ER1. To reduce poverty and social exclusion</b>					
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>					
<b>ER3. To help meet the housing requirements for the whole community</b>	+ Aims to allow adaptability of flats to different lifestyles	0 Policy not included	+ Aims to allow adaptability of flats to different lifestyles		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					
<b>ER5. To revitalise town centres</b>					
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Aims for cycle storage and may encourage cycle use	- Lacks cycle space	+ Aims for cycle storage		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>					
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+ Aims to minimise noise conflicts	0 Policy not included	++ Would minimise noise conflicts even more		

<b>IP1 Policy Area 51: Sequential approach to the location of development</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Seeks to protect new and existing district service centres, reducing need for travel	- May result in local services being lost, increasing trip generation		
<b>ET2. To conserve soil resources and quality</b>				
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Seeks to protect new and existing district service centres, reducing need for travel	- May result in local services being lost, increasing trip generation		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Seeks to protect new and existing district service centres	- May result in local services being lost		
<b>ET6. To reduce contributions to climate change</b>				
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>				
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>				
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>				
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+ Seeks to protect new and existing district service centres, meaning people can walk/cycle to them	- May result in local services being lost, meaning people have to drive		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>				
<b>ER1. To reduce poverty and social exclusion</b>	+ Seeks to protect new and existing district service centres	- May result in local services being lost		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Seeks to protect new and existing district service centres	- May result in local services being lost		
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>				
<b>ER5. To revitalise town centres</b>				
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Seeks to protect new and existing district service centres, reducing need for travel	- May result in local services being lost, increasing trip generation		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

<b>IP1 Policy Area 52: Key cycle and pedestrian routes</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	++ Proposes improvements for cycling/walking facilities, which may reduce trip generation	0 Leaves provision as it is	? Does not say which other routes are prioritised		
<b>ET2. To conserve soil resources and quality</b>					
<b>ET3. To reduce waste</b>					
<b>ET4. To reduce the effects of traffic upon the environment</b>	++ Proposes improvements for cycling/walking facilities, which may reduce trip generation	0 Leaves provision as it is	? Does not say which other routes are prioritised		
<b>ET5. To improve access to key services for all sectors of the population</b>	++ Improved cycling/walking facilities may improve access to services				
<b>ET6. To reduce contributions to climate change</b>					
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>					
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>					
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>					
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>	++ Proposes improvements for cycling/walking facilities, which may encourage people to do so	0 Leaves provision as it is	? Does not say which other routes are prioritised		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>					
<b>ER1. To reduce poverty and social exclusion</b>					
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>					
<b>ER3. To help meet the housing requirements for the whole community</b>					
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					
<b>ER5. To revitalise town centres</b>	0 No evidence of how schemes join together				
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	++ Proposes improvements for cycling/walking facilities, which may reduce trip generation	0 Leaves provision as it is	? Does not say which other routes are prioritised		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>					
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>					



<b>IP1 Policy Area 53: Wet dock crossing</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	- Better road connections may encourage more traffic	0 Omits proposal	- Better road connections may encourage more traffic		
<b>ET2. To conserve soil resources and quality</b>					
<b>ET3. To reduce waste</b>					
<b>ET4. To reduce the effects of traffic upon the environment</b>	- Better road connections may encourage more traffic	0 Omits proposal	- Better road connections may encourage more traffic		
<b>ET5. To improve access to key services for all sectors of the population</b>					
<b>ET6. To reduce contributions to climate change</b>					
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>	- May damage River Orwell wildlife site	0 Omits proposal	- May damage River Orwell wildlife site		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	- May damage Wet Dock Conservation Area	0 Omits proposal	? Depends where alternative crossing is		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	- Building two bridges across the docks may damage townscape	0 Omits proposal	? Depends where alternative crossing is		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>	- Better road connections may encourage more people to drive	0 Omits proposal	- Better road connections may encourage more people to drive		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ May reduce traffic noise on Vernon and Duke Streets	0 Omits proposal	+ May reduce traffic noise on Vernon and Duke Streets		
<b>ER1. To reduce poverty and social exclusion</b>					
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Better road connections may boost local economy	0 Omits proposal	+ Better road connections may boost local economy		
<b>ER3. To help meet the housing requirements for the whole community</b>					
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Better road connections may boost local economy	0 Omits proposal	+ Better road connections may boost local economy		
<b>ER5. To revitalise town centres</b>					
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	- Better road connections may encourage more traffic	0 Omits proposal	- Better road connections may encourage more traffic		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Better road connections may boost local economy	0 Omits proposal	+ Better road connections may boost local economy		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>					

<b>IP1 Policy Area 54: Star Lane and College Street gyratory</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Reduces road capacity	+ Reduces road capacity	0 Proposes no change to current scenario		
<b>ET2. To conserve soil resources and quality</b>					
<b>ET3. To reduce waste</b>					
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Reduces road capacity	+ Reduces road capacity	0 Proposes no change to current scenario		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Improves access to town centre		- Increasing numbers in waterfront with poor access to town centre		
<b>ET6. To reduce contributions to climate change</b>					
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>					
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+ Reducing traffic may help preserve listed buildings on the gyratory	+ Reducing traffic may help preserve listed buildings on the gyratory	0 Proposes no change to current scenario		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>					
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>	+ Reducing road capacity may encourage more people to walk or cycle	+ Reducing road capacity may encourage more people to walk or cycle	0 Proposes no change to current scenario		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Potential to improve quality of life				
<b>ER1. To reduce poverty and social exclusion</b>					
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>					
<b>ER3. To help meet the housing requirements for the whole community</b>					
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	- Reducing to one lane may increase congestion and make the area less attractive for development	- Reducing to one lane may increase congestion and make the area less attractive for development	0 Proposes no change to current scenario		
<b>ER5. To revitalise town centres</b>	- Reducing to one lane may increase congestion and make travelling to the town centre less attractive	- Reducing to one lane may increase congestion and make travelling to the town centre less attractive	0 Proposes no change to current scenario		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Reduces road capacity	+ Reduces road capacity	0 Proposes no change to current scenario		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	- Reducing to one lane may increase congestion and make the area less attractive for development	- Reducing to one lane may increase congestion and make the area less attractive for development	0 Proposes no change to current scenario		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>					

<b>IP1 Policy Area 55: Public transport improvements</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	++ Seeks to improve public transport and link the town centre to the railway station with a free service	? Does not say what alternative approaches were		
<b>ET2. To conserve soil resources and quality</b>				
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	++ Seeks to improve public transport and link the town centre to the railway station with a free service	? Does not say what alternative approaches were		
<b>ET5. To improve access to key services for all sectors of the population</b>	++ Improves access by public transport to education quarter and the train station			
<b>ET6. To reduce contributions to climate change</b>				
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>				
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>				
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>				
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>				
<b>HW2. To improve the quality of life where people live and encourage community participation</b>				
<b>ER1. To reduce poverty and social exclusion</b>	+ Improves links between communities e.g. waterfront and education quarter			
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>				
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>				
<b>ER5. To revitalise town centres</b>	+ Seeks to improve links to centre			
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	++ Seeks to improve public transport and link the town centre to the railway station with a free service	? Does not say what alternative approaches were		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	+ Improves public access to the education quarter			
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

<b>IP1 Policy Area 56: Parking strategy</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	- Increase in parking spaces will encourage more car trips	+ Limits long stay parking	- Increase in parking spaces will encourage more car trips		
<b>ET2. To conserve soil resources and quality</b>	+ More efficient use made of existing car parking sites (business development etc.)				
<b>ET3. To reduce waste</b>					
<b>ET4. To reduce the effects of traffic upon the environment</b>	- Increase in parking spaces will encourage more car trips	+ Limits long stay parking	- Increase in parking spaces will encourage more car trips		
<b>ET5. To improve access to key services for all sectors of the population</b>	? No provision for UCS				
<b>ET6. To reduce contributions to climate change</b>					
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>					
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>					
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>					
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>	- Increasing car use may mean fewer people walk or cycle		- Increasing car use may mean fewer people walk or cycle		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>					
<b>ER1. To reduce poverty and social exclusion</b>					
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>					
<b>ER3. To help meet the housing requirements for the whole community</b>					
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					
<b>ER5. To revitalise town centres</b>	+ Net increase in car parking increases customer base of town centre	- Limited long stay parking may result in shorter visits to the town	+ Net increase in car parking increases customer base of town centre		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	- Increase in parking spaces will encourage more car trips		- Increase in parking spaces will encourage more car trips		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Parking provision increases attractiveness of town	-/0 Limits long stay parking	+ Parking provision increases attractiveness of town		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>					

<b>IP1 Policy Area 57: The central area shopping boundary</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Alternative 3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Allowing retail development in the town centre is preferable to out-of-town development, which may generate traffic	- In the long term, as Ipswich grows, this may result in more development having to go out-of-town, and more traffic	++ Expanding southwards (towards the train station) may encourage more people to use public transport	+ Allowing retail development in the town centre is preferable to out-of-town development, which may generate traffic		
<b>ET2. To conserve soil resources and quality</b>						
<b>ET3. To reduce waste</b>						
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Allowing retail development in the town centre is preferable to out-of-town development, which may generate traffic	- In the long term, as Ipswich grows, this may result in more development having to go out-of-town, and more traffic	++ Expanding southwards (towards the train station) may encourage more people to use public transport	+ Allowing retail development in the town centre is preferable to out-of-town development, which may generate traffic		
<b>ET5. To improve access to key services for all sectors of the population</b>			+ Could allow small local needs development in the south	- May disperse development		
<b>ET6. To reduce contributions to climate change</b>						
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>						
<b>ET8. To conserve and enhance biodiversity</b>						
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>						
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>						
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>						
<b>HW1. To improve the health of those most in need</b>	+ More people may be in walking or cycling range of town centre		+ More people may be in walking or cycling range of town centre	+ More people may be in walking or cycling range of town centre		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>						
<b>ER1. To reduce poverty and social exclusion</b>						
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Would allow expansion of retail sector, providing more jobs		+ Would allow expansion of retail sector, providing more jobs	+ Would allow expansion of retail sector, providing more jobs		
<b>ER3. To help meet the housing requirements for the whole community</b>						
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Provides local retail development		+ Provides local retail development	+ Provides local retail development		
<b>ER5. To revitalise town centres</b>	+ Allows growth of town centre without damaging its retail focus	0 Retains current shopping area	0/+ Allows growth of town centre, but not the larger format retailing	0/+ Allows growth of town centre, but not large sites		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Allowing retail development in the town centre is preferable to out-of-town development, which may generate traffic	- In the long term, as Ipswich grows, this may result in more development having to go out-of-town, and more traffic	++ Expanding southwards (towards the train station) may encourage more people to use public transport	+ Allowing retail development in the town centre is preferable to out-of-town development, which may generate traffic		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Provides land for development		0/+ Provides more land, but possible not for larger format retailing	0/+ Provides more land, but possible not large sites		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>						
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>						

<b>IP1 Policy Area 58: Primary, secondary and speciality shopping areas</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality					
ET2. To conserve soil resources and quality					
ET3. To reduce waste					
ET4. To reduce the effects of traffic upon the environment					
ET5. To improve access to key services for all sectors of the population					
ET6. To reduce contributions to climate change					
ET7. To reduce vulnerability to climatic events and increasing sea levels					
ET8. To conserve and enhance biodiversity					
ET9. To conserve and where appropriate enhance areas and sites of historical importance					
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes					
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs					
HW1. To improve the health of those most in need					
HW2. To improve the quality of life where people live and encourage community participation					
ER1. To reduce poverty and social exclusion					
ER2. To offer everybody the opportunity for rewarding and satisfying employment					
ER3. To help meet the housing requirements for the whole community					
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area					
ER5. To revitalise town centres	+ Helps prevent excessive levels of vacancies	+ Keeps shopping areas at a larger size, possibly aiding future development as Ipswich grows	-- May damage town centre		
ER6. To encourage efficient patterns of movement in support of economic growth					
ER7. To encourage and accommodate both indigenous and inward investment					
CL1. To maintain and improve access to education and skills for both young people and adults					
CD1. To minimise potential opportunities for crime and anti-social activity					

<b>IP1 Policy Area 59: Waterfront shopping</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Allows key services (shops) to be provided for waterfront residents, reducing trip generation	? Increasing need to travel	+ Allows key services (shops) to be provided for waterfront residents, reducing trip generation		
<b>ET2. To conserve soil resources and quality</b>					
<b>ET3. To reduce waste</b>					
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Allows key services (shops) to be provided for waterfront residents, reducing trip generation	? Increasing need to travel	+ Allows key services (shops) to be provided for waterfront residents, reducing trip generation		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Allows key services (shops) to be provided for waterfront residents	- May have to travel further to services	+ Allows key services (shops) to be provided for waterfront residents		
<b>ET6. To reduce contributions to climate change</b>					
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>					
<b>ET8. To conserve and enhance biodiversity</b>					
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>					
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>					
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>	+ May allow waterfront residents to walk/cycle to shops	? Increasing need to travel	+ May allow waterfront residents to walk/cycle to shops		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>					
<b>ER1. To reduce poverty and social exclusion</b>					
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ May create more employment on the waterfront	- May result in less employment on waterfront	+ May create more employment on the waterfront		
<b>ER3. To help meet the housing requirements for the whole community</b>					
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ May create more employment on the waterfront	- May result in less employment on waterfront	+ May create more employment on the waterfront		
<b>ER5. To revitalise town centres</b>			- Could rival town centre		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Allows key services (shops) to be provided for waterfront residents, reducing trip generation	? Increasing need to travel	+ Allows key services (shops) to be provided for waterfront residents, reducing trip generation		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Land allocation and housing development may encourage investment		++ May attract larger retailers		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>					

<b>IP1 Policy Area 60: Site allocations for new retail development</b>	<b>Preferred Option 1: UC051</b>	<b>Preferred Option 2: UC072 &amp; UC058</b>	<b>Preferred Option 3: UC041</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	- Located in an AQMA, however may be improvement on current site use	- Located in an AQMA, however may be improvement on current site use	0 No anticipated impact	0 No allocation		
<b>ET2. To conserve soil resources and quality</b>						
<b>ET3. To reduce waste</b>	- Any retail development will produce waste	- Any retail development will produce waste	- Any retail development will produce waste	0 No allocation		
<b>ET4. To reduce the effects of traffic upon the environment</b>	-- Attracting residents, shoppers will increase traffic	-- Attracting residents, shoppers will increase traffic	-- Attracting residents, shoppers will increase traffic	0 No allocation		Some sites are large and central enough to cause short term traffic issues throughout the construction period; these will need to be addressed.
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Potential increased access to retail and shopping space	+ Potential increased access to retail and shopping space	+ Potential increased access to retail and shopping space	0 No allocation		
<b>ET6. To reduce contributions to climate change</b>	- Development will increase traffic, building design could increase efficiency	- Development will increase traffic, building design could increase efficiency	- Development will increase traffic, building design could increase efficiency	0 No allocation		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>						Risk of flood damage until strategic approach to flood risk is undertaken.
<b>ET8. To conserve and enhance biodiversity</b>	- Potential for BAP species and habitats on all sties	- Potential for BAP species and habitats on all sties	- Potential for BAP species and habitats on all sties	0 No allocation		Potential long term, permanent loss of species and habitats.
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	- Site in proximity to archaeological sites	- Site in proximity to archaeological sites	- Site in proximity to archaeological sites	0 No allocation		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	0 Site may enhance quality of townscape depending on design of development, impact unknown	0 Site may enhance quality of townscape depending on design of development, impact unknown	0 Site may enhance quality of townscape depending on design of development, impact unknown	0 No allocation		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>						
<b>HW1. To improve the health of those most in need</b>						
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	0 / + Possible slight improvement	0 / + Possible slight improvement	0 / + Possible slight improvement	0 No allocation		
<b>ER1. To reduce poverty and social exclusion</b>						
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Retail space should create jobs	+ Retail space should create jobs	+ Retail space should create jobs	0 No allocation		
<b>ER3. To help meet the housing requirements for the whole community</b>						
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Increased retail space should contribute to economic growth	+ Increased retail space should contribute to economic growth	+ Increased retail space should contribute to economic growth	0 No allocation		
<b>ER5. To revitalise town centres</b>	++ Redevelopment of town centre site	++ Redevelopment of town centre site	++ Redevelopment of town centre site	0 No allocation		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Good location for efficient movement	+ Good location for efficient movement	+ Good location for efficient movement	0 No allocation		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	++ Increased retail space should encourage and accommodate investment	++ Increased retail space should encourage and accommodate investment	++ Increased retail space should encourage and accommodate investment	0 No allocation		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>						
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>						



<b>IP1 Policy Area 61: Environmental improvements</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Alternative 2</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+/- Aims to create more pedestrian and cycling facilities, which may reduce trip generation, but also aims to facilitate a new wet dock crossing, which may encourage traffic	? Does not state how development principles may be different	- May result in less pedestrian/cycling improvements		
<b>ET2. To conserve soil resources and quality</b>					
<b>ET3. To reduce waste</b>					
<b>ET4. To reduce the effects of traffic upon the environment</b>	+/- Aims to create more pedestrian and cycling facilities, which may reduce trip generation, but also aims to facilitate a new wet dock crossing, which may encourage traffic	? Does not state how development principles may be different	- May result in less pedestrian/cycling improvements		
<b>ET5. To improve access to key services for all sectors of the population</b>					
<b>ET6. To reduce contributions to climate change</b>					
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	+ Addresses flood risk	? Does not state how development principles may be different	? Does not state how development principles may be different		
<b>ET8. To conserve and enhance biodiversity</b>					
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+ Seeks refurbishment of historic structures	? Does not state how development principles may be different	? Does not state how development principles may be different		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Seeks protection of key vistas and generally low rise developments	? Does not state how development principles may be different	? Does not state how development principles may be different		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>					
<b>HW1. To improve the health of those most in need</b>	++ Aims for play space and leisure complex	? Does not state how development principles may be different	? Does not state how development principles may be different		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Aims for open space	? Does not state how development principles may be different	- Only improves waterfront area		
<b>ER1. To reduce poverty and social exclusion</b>					
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>					
<b>ER3. To help meet the housing requirements for the whole community</b>					
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					
<b>ER5. To revitalise town centres</b>					
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+/- Aims to create more pedestrian and cycling facilities, which may reduce trip generation, but also aims to facilitate a new wet dock crossing, which may encourage traffic	? Does not state how development principles may be different	? Does not state how development principles may be different		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Facilitating a new wet dock crossing may make Ipswich a more attractive investment opportunity	? Does not state how development principles may be different	? Does not state how development principles may be different		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>					
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+ Improved leisure facilities may reduce anti-social behaviour	? Does not state how development principles may be different	? Does not state how development principles may be different		

<b>IP1 Policy Area 62: Green space and play</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Strategic greenspace could enhance townscape	0 No allocations		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	+ Aims to create green and play space	- Limited open space for waterfront community		
HW2. To improve the quality of life where people live and encourage community participation	+ Aims to create green space	- Limited open space for waterfront community		
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment	-/0 May limit employment land available	0/+ More employment land may be available		
ER3. To help meet the housing requirements for the whole community	-/0 May limit residential space a little	0/+ More housing land may be available		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	-/0 May limit employment land available	0/+ More employment land may be available		
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	-/0 May limit employment land available	0/+ More employment land may be available	+ Creating new greenspace may improve attractiveness to investors	
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>IP1 Policy Area 63: Urban design guidelines</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance	+ States that Conservation Area appraisals will be used			
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Aims to protect strategic views	- May result in tall buildings damaging townscape		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation		- Tall buildings may overshadow mixed-use areas		
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	+ Aims for landmark buildings at key gateways, which may improve town's image	0 No landmark buildings	+ Good urban design may make Ipswich more attractive to investors	
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>IP1 Policy Area 64: Site for Ipswich flood barrier</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels	++ Aims for tidal surge barrier	- May result in no flood barrier being built during plan period, but climate change may lead to increased flood risk during the time		
ET8. To conserve and enhance biodiversity	- Barrier may damage River Orwell wildlife site	0 May result in no flood barrier being built during plan period		
ET9. To conserve and where appropriate enhance areas and sites of historical importance	- Construction work may damage Wet Dock Conservation Area	0 May result in no flood barrier being built during plan period		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs			(P) - May affect SPA downriver	
HW1. To improve the health of those most in need			(P) + Increasing employment opportunities may improve health	
HW2. To improve the quality of life where people live and encourage community participation	+ May reduce fear of flooding			
ER1. To reduce poverty and social exclusion			(P) + May reduce risk of flooding destroying property and possessions	
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+ Will reduce flood risk and may increase opportunities for employment land construction			
ER3. To help meet the housing requirements for the whole community	+ Will reduce flood risk and may increase opportunities for housing construction	- May result in no flood barrier being built during plan period, but climate change may lead to increased flood risk during the time		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Will reduce flood risk and may increase opportunities for employment land construction	- No flood barrier may reduce business development		
ER5. To revitalise town centres		- No flood barrier may reduce business development		
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	+ Will reduce flood risk and may increase opportunities for employment land construction	- May result in no flood barrier being built during plan period, but climate change may lead to increased flood risk during the time		
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity			(P) Increasing employment opportunities may reduce crime rate	

<b>IP1 Policy Area 65: Site for town centre electricity sub station</b>	<b>Preferred Option</b>	<b>Alternative 1</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	- Enables use of more energy	0 Does not increase capacity		
ET7. To reduce vulnerability to climatic events and increasing sea levels	-- Development in flood plain	0 No development		
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance	- Development may damage conservation area	0 No development		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	- Larger site may have more impact on townscape	0 No development		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+ Will ensure energy available	- May harm expansion of town centre		
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Will ensure adequate supply available for expansion	- May harm expansion of town centre		
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	+ Will ensure adequate supply available for expansion	- May harm expansion of town centre		
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

## Appendix 6: Site Specific Sustainability Appraisal Tables

### SA of Sites Proposed for Housing

Site	Address	Urban Capacity Number	Issues & Options Ref	Site Area	Indicative Housing Capacity	% Hsg	Score	Significant Effects	Possible Mitigation Measures
1	Former Took's Bakery, Old Norwich Rd	UC005	S004	2.80	122	80	6	This site is in a deprived area, however has very little in the way of environmental and ecological constraints.	There are no real concerns regarding the development of this site.
2	All Weather Area, Halifax Rd	UC008	S006	0.78	43	100	5	Development of this site would result in the loss of play and/or open space.	Due to the current state of this site, it would be preferable to develop sites which are currently derelict or similar, hence ensuring that access to open space is not reduced.
3	Victoria Nurseries, Westerfield Rd	UC009	S007	0.39	14	100	-3	Tree preservation orders are present on this site, as well as it being located sufficiently far from the town centre to score comparatively poorly. A GP and primary school are not within 400m, hence other sites are considered to be more sustainable.	If this site was developed for housing, issues surrounding access to services would need to be addressed, development would also have to work around the TPO.
4	Co-op Depot, Felixstowe Rd	UC010	S008	5.15	227	80	10	Negative aspects concerning this site include TPO's and the lack of a household waste site in close proximity. However, the site offers good access to services, this is coupled with a relatively low level of concern environmentally, and hence this is a high scoring site.	This site would need to be planned around a TPO, there is also perhaps an opportunity to raise recycling awareness as part of this development, as it is not in close proximity of a household waste site, and this would need addressing as it is a significantly large site.
5	Hill House Rd	UC013	S011	0.10	17	100	5	There are no real concerns about development on this site. It is positive that it is close to a cycle route, and is also located in an area which is currently considered to be deprived. It should be noted however that the site is not within 400m of a GP or primary school.	If this site was developed for housing, attention would be needed to ensure that an efficient link to a primary school was established.
6	Funeral Directors, Suffolk Rd	UC016	S014	0.97	160	100	12	This site has no real concerns or constraints in terms of barriers to development, and also benefits from good access to services and facilities.	There are no real concerns regarding the development of this site.
7	Land West of Handford Cut	UC017	S015	0.49	27	100	11	Flooding could, as with many sites, be an issue here. This site is also within one of the top 20% of deprived areas. These however are the only real concerns, and the site offers good accessibility, and very little in the way of constraints.	Development of this site for housing will require the management of flood risk to potential residents. It may also represent an opportunity to raise the general quality of a deprived area.

Site	Address	Urban Capacity Number	Issues & Options Ref	Site Area	Indicative Housing Capacity	% Hsg	Score	Significant Effects	Possible Mitigation Measures
8	Deben Rd	UC018	S016	0.36	20	100	7	This site has no significant constraints regarding development, the only drawback being that it is not within 400m of a primary school.	If this site was developed for housing, attention would be needed to ensure that an efficient link to a primary school was established.
9	Water Tower	UC020	S018	1.61	56	100	-7	Development of this site would result in the loss of play and/or open space, and would also mean increasing vulnerability to flooding. The site also does not offer satisfactory service access which is reflected in its low score. Being in a conservation area including TPO's also means that there are problems here.	Improvement of access to services for potential residents would be required here, along with managing of the long term flood risk. A loss of play space could be mitigated by the relocation of facilities, and the conservation area would also need to be carefully worked around.
10	Randwell Close	UC021	S019	0.24	13	100	3	Developing this site would result in a loss of open space. Other concerns here include the fact that the site contains significant vegetation cover, and is not within close proximity of a household waste site.	Incorporating the current electricity sub station into a new site need not be problem. It is also likely that the rear gardens are not of significant ecological value, however this should be appraised before developing the site.
11	The Albany	UC022	S020	1.14	40	100	-4	This site has no real environmental or physical constraints, however does not offer relatively good access to services. It is however a Brownfield urban site which probably represents an ideal opportunity for development. There is also a TPO on the site.	This site should not require any specific action regarding mitigation of constraints. Development will have to work around a TPO, but other than this the site seems straightforward.
12	Fire Station, Colchester Rd	UC024	S022	1.21	16	20	0	This site again suffers from not being within 400m of key services, including a lack of sufficient access to a household waste site. However there are no significant physical or environmental constraints, and, being located on a brownfield site, this is probably suitable for development if the drawbacks are addressed.	Provided service provision was addressed, this site should not be a problem for development.
13	Mallard Way Garages	UC025	S023	0.14	8	100	8	This site is offers good access to services, as well as not suffering from any physical or environmental constraints.	This site is ideal for development. It is a small scale development on an underused site, and should not pose any short or long term disruptions.
14	Former Garages, Recreation Way	UC026	S025	0.19	10	100	-2	The drawbacks regarding this site are that it is not within easy reach of a household waste site, primary school or GP. There are no other concerns about development here, hence the only issues	Providing service provision was addressed here, it would make an ideal site for housing development. Again, despite being in a residential area, it is a small scale site which should not have any short term impacts from construction and building work.

Site	Address	Urban Capacity Number	Issues & Options Ref	Site Area	Indicative Housing Capacity	% Hsg	Score	Significant Effects	Possible Mitigation Measures
15	163 & 165 Henniker Rd	UC027	S026	0.16	9	100	3	This site provides good access to the A12/A14 and is also within close proximity to cycle paths. It does however suffer from not being within 400m of key local services. No physical or environmental constraints were recorded hence an approximately average overall score.	Provided service provision was addressed, this site should not be a problem for development.
16	Land opposite 674-734 Bramford Rd	UC030	S029	2.26	85	50	-4	It was considered that this site is undeveloped and would potentially impact upon landscape character, result in the loss of play or open space. These factors are the key contributors to its low score. It is however in close proximity to a cycle path, as well as offering good access to main roads. Access to key local services is not strong however.	There is a possibility of long term affects for residents as the site is close to the A14, hence noise and pollution levels may mean that housing is not appropriate. The site is also currently undeveloped and could lead to the loss of play space. These constraints are more difficult to mitigate than most, hence this site may be very difficult to develop sustainably.
17	King George V Field, Old Norwich Rd	UC033	S033	3.54	97	50	-4	It was considered that this site was located upon undeveloped land, and development of this could affect the landscape character of the area and decrease provision of local open space and play space. Service provision was not hugely strong, given the location outside of the town centre. There are however good links with cycle paths and access to main roads.	In order to develop this site sustainably, issues surrounding access to local services would need addressing, particularly due to the large scale of the development. The site is also within a conservation area, which in itself would mean that planning and site assessment would have to be undertaken with great care to compensate of any losses and minimise long term impacts. Relocation of the current sports facilities would also be desirable; this is outlined in the proposal which is a positive step.
18	Land at Bramford Rd (Stocks site)	UC034	S034	2.03	22	20	-1	This site is located upon an old landfill site, hence care would need to be taken if developing here. It is also considered that a development on this site could result in the loss of open space and play space, as well as altering the landscape character. The site is also outside of the town centre and does not have immediate access to a GP.	To develop this site would result in the loss of recreational space; the site is currently undeveloped and the frequent site of a funfair. This would be a long term permanent negative impact, unless a creation of similar space was outlined elsewhere. Service provision and/or access to services should be improved to cater for potential residents.
19	578 Wherstead Rd	UC035	S035	0.64	22	100	-3	This site is not within 400m of any healthcare facilities or a primary school. It is also in close proximity to a local wildlife site, and lies upon a flood plain. This is reflected in the low score for this site.	This site would require the alleviation of flood risk, as well as improvement of access to services.



Site	Address	Urban Capacity Number	Issues & Options Ref	Site Area	Indicative Housing Capacity	% Hsg	Score	Significant Effects	Possible Mitigation Measures
20	Raeburn Rd South /Sandy Hill Lane	UC061	S062	5.85	102	50	-1	We considered that the development of this site may impact upon the landscape character, given the significant vegetation which is currently present on the site. The site also suffers from having poor access to a household waste site, as well as being over 400m from the nearest GP. This site is also within close proximity to a sewage works, and also SWT have notified of an Orchid presence here.	This site is currently a county wildlife site, hence the development of the site would require the recreation or relocation of species or habitats, notably investigation of species such as Orchids.. It would also require flood risk alleviation to protect the proposed 102 dwellings, as well as improved access to key services for potential residents. Due to the size of the site and the scale of development, there will be possible short term construction issues; hence the planning of development would need to be undertaken carefully. The site is also close to the Orwell Estuary SPA, hence issues may arise here. Being currently hard standing space, drainage could potentially be improved through careful development, however there are evidently a few complications arising with this site.
21	Elton Park Industrial Estate	UC062	S064	3	165	50	0	Development of this site may result in the loss of open space. This, coupled with average to poor service provision due to the location of the site outside of the town centre, has meant that it scores poorly in terms of sustainability.	This site does not currently offer public open space, hence the outcome of the SA would be to recommended the access to key services would need to be improved if the site was to be developed sustainably.
22	London Rd Allotments	UC065	S069	1.55	54	100	0	The score recorded for this site is influenced by the potential loss of open space, change in landscape character and development on a site which currently is undeveloped. It has immediate access to a primary school, but the closest GP is not within 400m.	The development of this site would lead to the loss of allotments, which is a long term impact which can only be mitigated by the creation of allotments or gardens elsewhere. Access to healthcare would also need to be improved.
23	Former 405 Club, Bader Close	UC068	S071	3.22	89	50	2	Developing housing on this site would lead to the loss of play space and open space, which would then be likely to impact upon the landscape character of the area. The site is also not within close proximity of a household waste site. Positive aspects of this site include its access to a primary school, and that it is technically previously developed.	The proposal for this site includes 50% creation of open space, which would mean the loss of sports facilities could be mitigated. As a significant number of new dwellings are to be created, attention should be given to the waste management issues to create a development which is sustainable in the long term!
24	JJ Wilson, White Elm Street	UC069	S073	0.22	12	100	6	This site is within the town centre, hence has good access to facilities including cycle routes. However despite this location, GP and primary school access is not available within 400m. There are no real concerns in terms of ecological or environmental constraints, hence the average score returned for this site.	This site is adjacent to an AQMA, and potentially represents a chance to improve air quality through a switch from warehousing to residential development. Access to key services should also be addressed for the site to be sustainable.

Site	Address	Urban Capacity Number	Issues & Options Ref	Site Area	Indicative Housing Capacity	% Hsg	Score	Significant Effects	Possible Mitigation Measures
25	Former British Energy Site	UC070	S074	5.25	92	50	-4	This housing proposal does not offer access to healthcare or education within 400m. It is also observed that the site is close to a local wildlife site. Being a previously developed and underused site, it is however likely that some form of development would be positive in this area, but in sustainability terms there are clearly issues which would need addressing.	This site would represent a very large development, and would require careful management of construction related traffic and disturbances. In order for housing development here to be sustainable, improvements in service access would also be required. Care would also have to be taken when developing on a former landfill site.
26	Land between Cobbold St & Woodbridge Rd	UC073	S077	0.19	31	100	18	This site is within a conservation area and is home to a TPO. It is also currently a community centre hence would lead to the loss of a meeting place.	The loss of community facilities here should be mitigated by their relocation elsewhere. It would also be necessary to develop around the TPO, and adhere to any constraints posed by the conservation area designation. Given the complications and losses associated with development of this site, it is probable that there are more sustainable solutions elsewhere.
27	Cocksedge Engineering, Sandy Hill Lane	UC076	S084	0.63	22	100	-2	The only concern regarding development on this site was that it was considered to be close to a local wildlife site. The site also is not within 400m of a GP or primary school, as well as being away from the town centre.	An assessment of any potential impacts upon protected or BAP species/habitats would be a must when developing this site, as would the improvement of access to services for the substantial number of new dwellings which are proposed.
28	Thomas Wolsey Special School, Old Norwich Rd	UC077	S085	1.38	76	100	10	There are no real concerns regarding development on this site, however issues surrounding traffic and open space loss were raised through the site visit details.	This site would be a sustainable location for housing development, and the loss of the current Special School could be mitigated by their relocation elsewhere, this is important given that the school may be used by local communities in evenings. A small playing field is also currently on site, this would be permanently lost if development ensued. There are also concerns regarding traffic impact on the trunk network. All of these constraints could be mitigated, and this would be necessary for the development of the site.
29	Land at Yarmouth Rd	UC080	S088	0.78	22	50	4	The location of this site upon the waterfront means that there is potential for pollution as well as a flood risk. The site is also close to a local wildlife site. However the site is located within the town centre, hence has good access to a cycle path and primary school, which is reflected in the approximately average score returned.	Providing management of flood and water pollution risk was undertaken, along with an ecological assessment of impact on species and habitats, this site does not suffer from any significant constraints.

Site	Address	Urban Capacity Number	Issues & Options Ref	Site Area	Indicative Housing Capacity	% Hsg	Score	Significant Effects	Possible Mitigation Measures
30	345 Woodbridge Rd	UC092	S103	0.38	21	100	7	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed.	Development of this site should not require the mitigation of any constraints. It has been noted however that the water treatment plant and local primary schools are at capacity, so development in this area may require some high level improvement of services and infrastructure if it is to be sustainable in the long term.
31	Morpeth House, 97-99 Lacey St	UC106		0.31	11	100	10	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed. It is however on an ex landfill site, which may cause problems for houses developed on it.	Development of this site should not require any mitigation of constraints, providing that the risk of landfill gas is assessed fully.
32	Telephone Exchange, Portman Rd	UC110		0.53	29	100	12	The only concern here is a proximity to listed buildings; the site is otherwise scoring well and does not present a problem in terms of sustainability.	Providing that this site did not disturb nearby listed buildings or the abutting conservation area, it represents a good opportunity of sustainable development.
33	6-24 Defoe Rd	UC114		0.20	11	100	2	There are no significant constraints regarding development of this site.	This site is not of concern with regard to sustainability.
34	R/O Stratford Rd & Cedarwood Rd	UC115		0.20	11	100	7	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed.	This site is not of concern with regard to sustainability.
35	Henniker Rd (R/O 668-730 Bramford Rd)	UC120		0.36	27	100	3	This site has no real environmental or physical constraints. It is within good proximity to cycle paths but does not have strong service provision.	Provided service provision was improved to serve the new dwellings, this site should not impact negatively on the nearby environment, or require any mitigation of impacts.
36	32 Larchcroft Rd	UC125		0.23	8	100	6	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed.	There are no issues which have arisen requiring mitigation here.
37	301 –305 Norwich Rd	UC128		0.66	23	100	12	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed.	There are no issues which have arisen requiring mitigation here.
38	Depot, Beaconsfield Rd	UC129		0.34	19	100	5	This score for this site is relatively average, however its waterfront location raises concerns and pollution and flooding.	This site would require the management of flood risk, and provides an opportunity to improve the environmental quality of the area through redevelopment.
39	R/O Riverside Rd/Bramford Rd	UC130		0.34	19	100	8	There are no major concerns about development in this site. It is rare to find a site with no environmental constraints, which also benefits from a good location including proximity to cycle paths and alike. A TPO is present however.	There are no issues which have arisen requiring mitigation here, other than ensuring that the development worked around the TPO.
40	R/O 601-655 Bramford Rd	UC132		0.95	71	100	3	There is nothing of any real significance in terms of the sustainability of developing this site.	There are no issues which have arisen requiring mitigation here.

Site	Address	Urban Capacity Number	Issues & Options Ref	Site Area	Indicative Housing Capacity	% Hsg	Score	Significant Effects	Possible Mitigation Measures
41	Builders Yard, Vermont Crescent	UC148		0.20	7	100	0	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed. The site however is upon a landfill consultation zone.	Providing the risk of landfill gas migrating from landfill was addressed, this site represents a good location for development.
42	R/O Jupiter Rd & Reading Rd	UC156		0.50	23	100	9	This site is located on a site which was previously used for landfill, and is also currently not within 3km of a household waste site. These are the only real issues regarding development on this site, otherwise it is a good opportunity to develop an area which as a good service provision and access.	Providing the risk of landfill gas migrating from landfill was addressed, this site represents a good location for development.
43	14 Crofton Rd	UC157		0.26	14	100	6	There are no significant drawbacks of development here, apart from the lack of proximity to a primary school and household waste site.	Provided service provision was improved to serve the new dwellings, this site should not impact negatively on the nearby environment, or require any mitigation of impacts.
44	Club, Newton Rd	UC167		0.32	18	100	14	There are no concerns about development on this site other than the associated loss of the existing facility.	This site would not require any mitigation of constraints, with the exception potentially of a relocation of the bowling green as a recreation facility and issues associated with the social and community aspects of the club.
45	2 & 4 Derby Rd	UC170		0.49	27	100	12	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed, provided that the TPO was worked around	This site would not require any mitigation of constraints, with the exception of developing in a manner that sustains the TPO.
46	The Railway PH & Foxhall Rd	UC171		0.34	4	20	11	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed.	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed.
47	R/O Cauldwell Hall Rd & Kemball St	UC172		0.45	25	100	1	This site suffers from not being within 400m of a primary school or GP, or 3km of a household waste site.	Improvements in access to healthcare and household waste sites were the only issues which we considered to constrain development here.
48	547 Foxhall Rd & Land to rear	UC180		0.37	13	100	3	This site offers satisfactory access to services, however still suffers from a lack of access to a household waste site. Developing this site would require the provision of community facilities elsewhere.	Improvements in terms of access to the services and facilities mentioned would be required here.

Site	Address	Urban Capacity Number	Issues & Options Ref	Site Area	Indicative Housing Capacity	% Hsg	Score	Significant Effects	Possible Mitigation Measures
49	St Clements Hospital Grounds	UC185		11.63	512	80	-4	It was considered that development on this site could impact upon the landscape character of the area and result in a loss of vegetation. This is reflected in the presence of a tree preservation order on the site. Hence the site is scoring poorly in terms of sustainability if developed.	Development of this site is proposed such that 20% open space is retained, indicating an intention not to alter the character of the land completely. This site draws on a wider relocation strategy (policy Area 24), whereby healthcare facilities re relocated. Hence provided the TPO was developed around, and the nature of the development was sympathetic with the surrounding area, this site would be sustainable for housing.
50	R/O Allenby Rd & Hadleigh Rd	UC192		0.46	25	100	6	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed. Traffic issues however would need addressing, with access to the site being improved. The development is also very close to current residential areas hence may cause problems here.	Care would have to be taken to ensure that development did not impact upon the current residents. An assessment of the potential dangers relating to the landfill site would also be required, as well as the improvement of infrastructure to give safe access to the site by road.
51	Front of pumping station, Belstead Rd	UC209		0.60	33	100	-1	The only significant constraint for developing this site is its proximity to a site where protected species have been reported. Service provision and access is relatively poor which is reflected in the low overall score	As with all sites, an assessment of potential ecological impacts should be undertaken before developing this site, however this is the only constraint that may potentially exist and require mitigation.
52	R/O 17-27 Ramsey Close (Wigmore Close)	UC213		0.36	20	100	10	The main concerns surrounding this site are that it is currently home to significant vegetation, including a tree preservation order. Development here could result in loss of open space. However the site is in a good location and this is the only real constraint, which is reflected in the relatively high score.	Providing that the TPO was worked around, this site would provide an ideal location for housing development.
53	100 Clapgate Lane	UC229		0.32	18	100	8	There are no real concerns regarding development on this site.	There are no real concerns regarding development on this site, although care should be taken when developing on landfill sites.
54	Corner Hawke Rd & Holbrook Rd	UC230		0.25	9	100	0	There are no significant constraints regarding development of this site.	There are no real concerns regarding development on this site, although care should be taken when developing on landfill sites.
55	251 Clapgate Lane	UC231		0.58	16	50	5	There are no significant constraints regarding development of this site.	There are no real concerns regarding development on this site, although care should be taken when developing on landfill sites.

Site	Address	Urban Capacity Number	Issues & Options Ref	Site Area	Indicative Housing Capacity	% Hsg	Score	Significant Effects	Possible Mitigation Measures
56	15-39a Bucklesham Rd	UC234		1.20	21	50	-8	This site scores negatively as it is currently open space including significant vegetation and a tree preservation order. The site was also previously used for landfill which could pose problems for development.	This site is in fact located in the grounds of a large home, and would not result in the loss of public open space. However a tree preservation order would need to be adhered to. Care should also be taken whilst developing on previous landfill sites.
57	Former Driving Test Centre, Woodbridge Rd	UC236		0.24	13	100	7	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed.	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed.
58	BT Depot, Woodbridge Rd	UC237		1.53	84	100	11	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed.	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed.
59	South of Bramford Rd	UC246		0.70	25	100	5	The only real constraint to note regarding this site is that it lies within a flood zone. There is also a TPO present, as well as the location on ex landfill land.	Provided flood risk management was addressed, this site would provide a good location for development. A TPO would also have to be developed around, as well as assessing any potential risk of landfill gas danger related to the site.
60	112-116 Bramford Road	UC250		0.17	15	100	10	The only real concern regarding development of this site is the proximity to a listed building and location of a flood plain, as well as abutting listed buildings, and the existence of a TPO on the site.	Flood risk would need to be managed in order for this site to be sustainable in the long term. Care would also need to be taken when developing the site in order not to disturb the protected tree or nearby listed buildings.
61	Running Buck, St Margaret's Plain	UC252		0.15	25	100	5	Despite being located close to the town centre, there are various constraints which would need to be considered. These include tree preservation orders, listed buildings and local wildlife sites and a conservation area. In addition to this, the site is also in air quality management area.	Given that the site is located in an AQMA, residential use is probably the most appropriate development here. Care would also have to be taken not to disturb the protected tree, as well as a requirement for an ecological assessment to ensure that any wildlife or habitat losses could be properly assessed and mitigated if possible

## SA of Sites Proposed for Mixed Use

### Sites proposed for a mix of uses including employment and housing

Site	Address	Urban Capacity Number	Issues & Options Ref	% Employment	% Other Uses	Score	Significant Effects	Possible Mitigation Measures
20	Raeburn Rd South/Sandy Hill Lane	UC061	S062	50% Employment	50% Housing	-1	We considered that the development of this site may impact upon the landscape character, given the significant vegetation which is currently present on the site. The site also suffers from having poor access to a household waste site, as well as being over 400m from the nearest GP. This site is also within close proximity to a sewage works, and also SWT have notified of an Orchid presence here.	This site is currently a county wildlife site; hence the development of the site would require the recreation or relocation of species or habitats, notably investigation of species such as Orchids. It would also require flood risk alleviation to protect the proposed 102 dwellings, as well as improved access to key services for potential residents. Due to the size of the site and the scale of development, there will be possible short term construction issues; hence the planning of development would need to be undertaken carefully. The site is also close to the Orwell Estuary SPA, hence issues may arise here. Being currently hard standing space, drainage could potentially be improved through careful development, however there are evidently a few complications arising with this site.
21	Elton Park Industrial Estate	UC062	S064	50% Employment	50% Housing	0	Development of this site may result in the loss of open space. This, coupled with average to poor service provision due to the location of the site outside of the town centre, has meant that it scores poorly in terms of sustainability.	This site does not currently offer public open space, hence the outcome of the SA would be to recommend the access to key services would need to be improved if the site was to be developed sustainably.
25	Former British Energy Site	UC070	S074	50% Employment	50% Housing	-4	This housing proposal does not offer access to healthcare or education within 400m. It is also observed that the site is close to a local wildlife site. Being a previously developed and underused site, it is however likely that some form of development would be positive in this area, but in sustainability terms there are clearly issues which would need addressing.	This site would represent a very large development, and would require careful management of construction related traffic and disturbances. In order for housing development here to be sustainable, improvements in service access would also be required. Care would also have to be taken when developing on a former landfill site.

### Sites proposed for a mix of uses including open space

Site	Address	Urban Capacity Number	Issues & Options Ref	%Open Space	%Other Uses	Score	Significant Effects	Possible Mitigation Measures
16	Land opposite 674-734 Bramford Rd	UC030	S029	50% Open Space	50% Housing	-4	It was considered that this site is undeveloped and would potentially impact upon landscape character, result in the loss of play or open space. These factors are the key contributors to its low score. It is however in close proximity to a cycle path, as well as offering good access to main roads. Access to key local services is not strong however.	There is a possibility of long term affects for residents as the site is close to the A14, hence noise and pollution levels may mean that housing is not appropriate. The site is also currently undeveloped and could lead to the loss of play space. These constraints are more difficult to mitigate than most, hence this site may be very difficult to develop sustainably.
17	King George V Field, Old Norwich Rd	UC033	S033	50% Open space/playing pitches	50% Housing	-4	It was considered that this site was located upon undeveloped land, and development of this could affect the landscape character of the area and decrease provision of local open space and play space. Service provision was not hugely strong, given the location outside of the town centre. There are however good links with cycle paths and access to main roads.	In order to develop this site sustainably, issues surrounding access to local services would need addressing, particular due to the large scale of the development. The site is also within a conservation area, which in itself would mean that planning and site assessment would have to be undertaken with great care to compensate of any losses and minimise long term impacts. Relocation of the current sports facilities would also be desirable; this is outlined in the proposal which is a positive step.
18	<u>Land at Bramford Rd</u> (Stocks Site)	UC034	S034	80% Open Space	20% Housing	-1	This site is located upon an old landfill site, hence care would need to be taken if developing here. It is also considered that a development on this site could result in the loss of open space and play space, as well as altering the landscape character. The site is also outside of the town centre and does not have immediate access to a GP.	To develop this site would result in the loss of recreational space; the site is currently undeveloped and the frequent site of a funfair. This would be a long term permanent negative impact, unless a creation of similar space was outlined elsewhere. Service provision and/or access to services should be improved to cater for potential residents.
23	Former 405 Club, Bader Close	UC068	S071	50% Open Space	50% Housing	2	Developing housing on this site would lead to the loss of play space and open space, which would then be likely to impact upon the landscape character of the area. The site is also not within close proximity of a household waste site. Positive aspects of this site include its access to a primary school, and that it is technically previously developed.	The proposal for this site includes 50% creation of open space, which would mean the loss of sports facilities could be mitigated. As a significant number of new dwellings are to be created, attention should be given to the waste management issues to create a development which is sustainable in the long term.
29	Land at Yarmouth Rd	UC080	S088	50% Open Space/Recreation	50% Housing	4	The location of this site upon the waterfront means that there is potential for pollution as well as a flood risk. The site is also close to a local wildlife site. However the site is located within the town centre, hence has good access to a cycle path and primary school, which is	Providing management of flood and water pollution risk was undertaken, along with an ecological assessment of impact on species and habitats, this site does not suffer from any significant constraints.



							reflected in the approximately average score returned.	
49	St Clements Hospital Grounds	UC185		20% Open Space	80% Housing	-4	It was considered that development on this site could impact upon the landscape character of the area and result in a loss of vegetation. This is reflected in the presence of a tree preservation order on the site. Hence the site is scoring poorly in terms of sustainability if developed.	Development of this site is proposed such that 20% open space is retained, indicating an intention not to alter the character of the land completely. This site draws on a wider relocation strategy (policy Area 24), whereby healthcare facilities are relocated. Hence provided the TPO was developed around, and the nature of the development was sympathetic with the surrounding area, this site would be sustainable for housing.

#### Sites proposed for a mix of uses including community uses

Site	Address	Urban Capacity Number	Issues & Options Ref	%Community Facilities	%Other Uses	Score	Significant Effects	Possible Mitigation Measures
1	Former Tooks Bakery, Old Norwich Rd	UC005	S004	20%	80% Housing	6	This site is in a deprived area, however has very little in the way of environmental and ecological constraints.	There are no real concerns regarding the development of this site.
4	Co-op Depot, Felixstowe Rd	UC010	S008	20%	80% Housing	10	Negative aspects concerning this site include TPO's and the lack of a household waste site in close proximity. However, the site offers good access to services, this is coupled with a relatively low level of concern environmentally, hence this is a high scoring site.	This site would need to be planned around a TPO, there is also perhaps an opportunity to raise recycling awareness as part of this development, as it is not in close proximity of a household waste site, and this would need addressing as it is a significantly large site.
12	Fire Station, Colchester Rd	UC024	S022	80% Retain existing uses	20% Housing	0	This site again suffers from not being within 400m of key services, including a lack of sufficient access to a household waste site. However there are no significant physical or environmental constraints, and, being located on a brownfield site, this is probably suitable for development if the drawbacks are addressed.	Provided service provision was addressed, this site should not be a problem for development.
46	The Railway PH, Foxhall Rd	UC171		80% Retain existing use	20% Housing	11	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed.	There are no concerns about development on this site, and we feel it represents one of the most sustainable options proposed.
56	15-39a Bucklesham Rd	UC234		50% Retain remainder in current residential use	50% Housing	-8	This site scores negatively as it is currently open space including significant vegetation and a tree preservation order. The site was also previously used for landfill which could pose problems for development.	This site is in fact located in the grounds of a large home, and would not result in the loss of public open space. However a tree preservation order would need to be adhered to. Care should also be taken whilst developing on previous landfill sites.

### SA of Sites Proposed for Employment

Site	Address	Urban Capacity Number	Issues & Options Ref	Site Area	Score	Significant Effects	Possible Mitigation Measures
62	83/85 Dales Rd	UC087	S098	0.57	Na	There are no constraints recorded for this site under a proposal for employment.	No mitigation required.
63	Part former Volvo site, Raeburn Rd South	UC113	Urban Capacity Site	2.29	Na	There are no constraints recorded for this site under a proposal for employment.	No mitigation required.
64	Cranes Site	UC258	S063	16.74	Na	The site includes a medium pressure gas pipe, and is on previous landfill land. There are also concerns about potential impacts upon nearby a14 junctions at Nacton.	Traffic issues would need to be addressed for the sustainable development of this site. Care should also be taken when developing around a gas pipe, and ensuring that there was no danger resulting from landfill gasses.
65	Former Norsk Hydro Site, Sandy Hill Lane	UC260	S068	6.55	Na	This site is polluted and is recorded as a landfill consultation zone as well as being affected by a hazardous substance zone.	This site would require cleansing from contamination, and ensuring that it was safe for employment development.
66	Ransomes Europark (east)/Land around Makro	UC263	S079	14.6 ha (includes 2.3 ha with unimplemented planning permission)	Na	A potential negative impact upon the trunk network was stated in the site survey. It is also noted that the site is located on previous landfill land.	Traffic management would need to be addressed if this site was to be developed for employment. Care should also be taken to ensure that there was no resulting danger from the landfill.
67	Land between railway junction and Hadleigh Road (see table 6 below)	UC264	S080	7.57	na	This site is located upon a flood plain. There are also TPO's present on the site which is located upon a landfill consultation zone. It is also noted that the water treatment works serving this site are at capacity.	High level approaches need to be taken to water treatment and flood risk to ensure sustainable development of sites in this location. Care should also be taken to development around Tree preservation orders.
68	Lister's, Landseer Road	UC268	S097	1.46	na	This site is polluted and is recorded as a landfill consultation zone as well as being affected by a hazardous substance zone.	This site would require cleansing from contamination, and ensuring that it was safe for employment development.

### SA of Sites Proposed for Transport

Site	Address	Urban Capacity Number	Issues & Options Ref	Site Area	Allocation	Score	Significant Effects	Possible Mitigation Measures
67	Land between railway junction and Hadleigh Road (see table 5 above)	UC264	S080	7.57	Employment/Transport (Development to allow for retention of proposed railway line)	na	This site is located upon a flood plain. There are also TPO's present on the site which is located upon a landfill consultation zone. It is also noted that the water treatment works serving this site are at capacity.	High level approaches need to be taken to water treatment and flood risk to ensure sustainable development of sites in this location. Care should also be taken to development around Tree preservation orders.
69	Airport Farm Kennels, north of A14	UC269	S107	8.40	Park & Ride	na	This site is of archaeological interest, and also contains tree preservation orders. Development of the site could also impact public rights of way, and the site is also within an AONB.	This site is within an AONB, hence development here would likely result in permanent loss of valued landscape, habitats or species.

### SA of Sites Proposed for Education

Site	Address	Urban Capacity Number	Issues & Options Ref	Site Area	Score	Significant Effects	Possible Mitigation Measures
70	School Site, Lavenham Rd	UC064	S065	1.08	na	This site is within a flood plain and located within an area with good service provision and access to facilities. Public transport to this site is good, and could be improved as part of green travel plans for schools and promoted sustainable transport. There are listed buildings adjacent to the site.	Flood risk needs to be alleviated, as the school would be at risk from flooding if developed here. Care would need to be taken during the construction and planning phases to ensure that the nearby listed building was not affected.

### SA of Sites with no allocation

<b>Site</b>	<b>Address</b>	<b>Urban Capacity Number</b>	<b>Issues &amp; Options Ref</b>	<b>Site Area</b>	<b>Comment</b>	<b>Score</b>	<b>Significant Effects</b>	<b>Possible Mitigation Measures</b>
71	Widgeon Close Garages	UC028	S027	0.10	In active use	Na	Sites not appraised	Sites not appraised
72	Land east of Humber Doucy Lane	UC031	S030	2.48	Open Countryside	Na	Sites not appraised	Sites not appraised
73	London Rd Allotments	UC066	S069b	0.73	Open Space/Allotments—retain existing use	Na	Sites not appraised	Sites not appraised
74	St Edmunds House, Rope Walk	UC075	S083	0.43	In active use	Na	Sites not appraised	Sites not appraised
75	Land south of Sewage Works	UC084	S094	4.16	Open Countryside adjacent to sewage works (may be needed for possible future expansion of the works)	Na	Sites not appraised	Sites not appraised
76	Land north of Whitton Lane	UC257	S061	6.92	No allocation – retain existing use	Na	Sites not appraised	Sites not appraised
77	Wooded area and large verge, Birkfield Drive	UC261	S072	2.11	Amenity Land	Na	Sites not appraised	Sites not appraised
78	St Clements' Golf Course	UC262	S078	14.05	Open Space/local wildlife site	Na	Sites not appraised	Sites not appraised
79	Land south of the A14	UC265	S081	14.32	Open Countryside	Na	Sites not appraised	Sites not appraised
80	Playing Fields, Victory Rd	UC079	S087	0.43	Recreational Open Space—retain existing use	Na	Sites not appraised	Sites not appraised
81	Land at Pond Hall Farm, south of the A14	UC266	S090	10.02	Open Countryside	Na	Sites not appraised	Sites not appraised
82	Land North of Whitton Sports Centre	UC083	S092	0.85	Playing fields/Recreation	Na	Sites not appraised	Sites not appraised
83	Land south of Ravenswood	UC267	S093	34.78	Open Space	na	Sites not appraised	Sites not appraised