

## **Sustainability Appraisal of Ipswich Borough Council Core Strategy and Policies Development Plan Document: Addendum Report November 2010.**

Suffolk County Council Research and Intelligence group undertook a sustainability appraisal of the draft submission version of the above document in August 2009 as required by the Planning and Compulsory Purchase Act 2004. Following consultation on the submission document a schedule of changes was produced and assessed for any impact on the original appraisal in March 2010. This confirmed that the changes were minor and insignificant except for one word change to DC 4 Development and Flood risk that reduced the sustainability of the policy.

Following changes to the Planning and Compulsory Purchase Act, further alterations were made to the plan and a schedule of changes presented for checking in October 2010.

This schedule has been checked for changes that significantly impact the sustainability appraisal outcome. The main changes are that the housing target has been reduced by 70 dwellings a year to 14,000 extra dwellings by 2021 (previously 15,400); the requirement for affordable housing on schemes of 15 or more dwellings or 0.5ha or more reduced from 40% to 35% and the policy concerning the development of the northern fringe has been amended. All other policies are unchanged apart from where direct reference to the Regional Spatial Strategy (and outdated Planning Policy Guidance / Ipswich Policy Area references) are made.

All changes are deemed to be insignificant, having no impact on the original sustainability appraisal given the strategic nature of the assessment, with the exception of the following:

### **CS7 Amount of Housing Required**

This will impact the numbers of affordable houses completed, as the percentage sought will be applied to a lower completions figure. In addition the percentage of affordable homes sought on schemes of 15 or more dwellings or 0.5ha or more has also been reduced from 40% to 35%. However the end effect of the policy to deliver more homes and deliver more affordable homes is argued to be appropriate to meet the local needs and is a relatively small change that does not impact the general sustainable assessment of the policy.

### **CS10 Ipswich Northern Fringe**

This policy now specifically refers to the addition of community facilities, provision of a railway crossing and country park. This impacts positively on scoring and hence results in increases in the sustainability of the development plan document overall. It is thought that the addition of mention of the railway crossing in the policy will not change the assessment of ET4 *To reduce the effects of traffic on the environment* because the development would still create more traffic. The railway crossing could help reduce the need to use a car within the development hence the +/- assessment is still appropriate.

The following table summarises the changes to scoring to CS10 as a result of the wording change. As it improves its sustainability this has a beneficial impact on

the overall sustainability of the plan. It mainly reinforces sustainability objectives that already scored highly although the slight improvement to ET8 is welcomed.

Indicator	Previous Score	New Score	Note
HW1: To improve the health of those most in need	0	0/+	New facilities may include health facilities
HW2: To improve the quality of life where people live and encourage community participation	0/+	+	Quality of life should increase with more community facilities and provision of Country Park.
ET5: To improve access to key services for all sectors of the population	0	+	Increased community facilities and provision of a railway crossing that will link phases of the development and assist local accessibility.
ET8: To conserve and enhance biodiversity	0/-	+/-	Greenfield development will result in loss of biodiversity but the provision of a Country park will provide opportunity to retain and enhance habitats.
ER1: To reduce poverty and social exclusion	0	0/+	More community facilities may decrease exclusion
<b>OVERALL</b>		<b>+3</b>	Policy revisions increase sustainability by 3 points in our assessment criteria.

It is noted that there is a small discrepancy between the target dates for housing and employment. The objectives stated in paragraph 6.8 state that at least 14,000 new dwelling units will be provided in Ipswich between 2001 and 2021 (17,500 by 2026) and 18,000 jobs in the wider Ipswich area between 2001 and 2025. This is not deemed to greatly impact the appraisal especially as the jobs target was originally deemed to be appropriate to the resident needs of 15,400 houses in Ipswich in the time period to 2025. The dwelling needs have been scaled back to 14,000 dwellings by 2026 so the jobs requirement (that is set for the broader Ipswich area) is adequate for the 2026 timescale. It is recommended that the timescales be aligned before the plan is finalised and the relationship between employment, housing and traffic is carefully monitored to ensure over provision of jobs does not result in increased in-commuting.

Attached is a schedule noting our assessment of the individual changes.

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## Ipswich Borough Council Core Strategy and Policies Development Plan Document

All changes to the Plan both focused and minor are listed in the following tables, along with the associated impact on the SA outcome of the development plan document.

### **Ipswich Borough Council Core Strategy and Policies DPD: Post Submission Schedule of Proposed Focused Changes, October 2010.**

Key to table

In the 'Change' column, new text is shown bold, underlined and italicised; deleted text is non-bold (struck through twice in track-changed sections).

<b>Policy/ paragraph</b>	<b>Change</b>	<b>Reason</b>	<b>SA Impact</b>
<b>Part A The Context</b>			
Chapter 3 3.5	Add a new paragraph 3.5: <b><i><u>Ipswich Borough Council considers that a jobs-led growth strategy is the right one for Ipswich. However, the Council has amended the scale and speed of growth for Ipswich in this development plan document to take account of factors such as the recession, the likelihood of reduced funding for infrastructure, the extent to which flats and houses are best meeting local housing needs, and updated information about the housing land supply.</u></i></b>	To respond to the revocation of the East of England Plan.  The Council decided on 27 <sup>th</sup> October 2010 (see Link 1 below) to proceed with the Core Strategy and Policies plan as submitted on 26 <sup>th</sup> March 2010, subject to focused changes to the targets to take account of more up to date evidence. The focused changes are set out in this schedule.  The topic paper Reviewing the Ipswich Housing Figures also provides more background (see Link 2 below).	No Impact
<b>Part B The Strategy</b>			
Chapter 6 6.8 Bullet 3	In bullet 3 change '15,400' to ' <b><u>14,000</u></b> ' and '(18,720 to 2025)' to ' <b><u>(17,500 by 2026)</u></b> ' in first sentence.  In bullet 3 insert ' <b><u>on larger sites</u></b> ' after '35% of them'	To reflect changes made elsewhere in the plan to respond to the revocation of the East of England Plan (see policies CS6, CS7, CS12 and CS13).	No Impact
Bullet 12	In bullet 3 amend end of sentence to read: <b>(b) 18,000 additional jobs shall be provided in <u>the wider Ipswich area</u> <del>Policy Area</del> between 2001 and 2025.</b>  Amend bullet 12 to read ' <b>To work with other local authorities in the <u>wider Ipswich area</u> <del>Policy Area</del> and with LSP partners to ensure a co-ordinated approach to planning and development.</b> '		No Impact

Policy/ paragraph	Change	Reason	SA Impact
<b>Policy CS6 Cross Boundary Working (formerly Ipswich Policy Area)</b>			
Policy CS6	Delete the policy title 'The Ipswich Policy Area' and replace with ' <b><u>Cross Boundary Working</u></b> '	To respond to the revocation of the East of England Plan, which identified the Ipswich Policy Area.	No Impact
8.65 (CS6)	Add the following text at the end of paragraph: <b><u>'However, following the revocation of the Regional Spatial Strategy, the Ipswich Policy Area no longer has a basis in policy.'</u></b>	The policy was formerly called Ipswich Policy Area. The revocation of RSS has removed the policy basis for the Ipswich Policy Area, but the Council remains committed to cross boundary working with neighbouring authorities on growth and infrastructure matters.	No Impact
8.66 (CS6)	Delete 'The Regional Spatial Strategy identifies' and 'as' from first sentence and add ' <b><u>is also</u></b> ' after Ipswich. Delete 'It is recognised as one of the main sub-regions in the East of England and has been' and add ' <b><u>The area was</u></b> ' and ' <b><u>in October 2006.</u></b> ' In last sentence.  The amended paragraph reads: <b><u>'Ipswich is also a key growth location within the Haven Gateway sub-region. The Haven Gateway comprises parts of Babergh, Mid Suffolk, Suffolk Coastal and all of Colchester, Ipswich and Tendring. The area was awarded Growth Point status in October 2006.'</u></b>	Therefore the policy has been retained and re-titled Cross Boundary Working. An amendment in the policy acknowledges that in future the mechanism for cross boundary working may be through continuation of the Ipswich Policy Area Board, or through other relevant forums.  An amendment in the explanation acknowledges that the local authorities may choose a different area over which to coordinate cross boundary issues, or retain the Ipswich Policy Area boundary as the area of focus. Appendix 3 to the plan does identify the Ipswich Policy Area boundary.	No Impact
8.67 (CS6)	Delete whole paragraph.	Alternatively there may be other groupings, such as the Suffolk Haven Gateway area, which may present an appropriate basis for cross boundary working on some issues.	No Impact
8.68 (CS6)	Delete whole paragraph. Replace with the following text: <b><u>'In planning strategically for housing, employment and infrastructure provision in the wider Ipswich area, the Council will need to work closely with neighbouring local authorities to ensure a coordinated approach.'</u></b>		No Impact
Policy CS6	Delete heading ' <b><u>POLICY CS6: THE IPSWICH POLICY AREA</u></b> ' and replace with ' <b><u>POLICY CS6: CROSS BOUNDARY WORKING</u></b> '		No Impact
Policy CS6 a.	Amend point a) to read: ' <b><u>Formal working through the Ipswich Policy Area Board or other relevant forums</u></b> '		No Impact
8.69 (CS6)	Change 'Ipswich Policy Area' to ' <b><u>cross boundary</u></b> ' in first sentence.		No Impact

Policy/ paragraph	Change	Reason	SA Impact
8.71 (CS6)	Add the following text at the end of paragraph: <b><u>'The Board may need to be refocused following the revocation of Regional Strategies.'</u></b>		No Impact
<b>Policy CS7 The Amount of Housing Required</b>			
8.75 (CS7)	Change 'gives' to ' <b><u>gave</u></b> ' in first sentence.  Add the following text at the end of paragraph: <b><u>'However, subsequent to the revocation of Regional Strategies, the Council revised this figure to 700 dwellings per annum (14,000 from 2001 to 2021) in the light of additional local evidence.'</u></b>	To respond to the revocation of the East of England Plan. The housing target for the Borough has been reduced from 15,400 dwellings 2001 - 2021 to 14,000 over the same period (as an annualised rate, a reduction from 770 to 700 p.a.). Evidence for this has been set out in Appendix 4 to the Council report (Link 1 below). It includes local housing need figures, population and household forecasts, and capacity data. In revising the figures, the baseline has been updated to April 2010 as the most up to date figures available when RSS was revoked. The topic paper Reviewing the Ipswich Housing Figures also provides more background (Link 2 below).	No Impact
8.76 (CS7)	Change 'eight' to ' <b><u>nine</u></b> ' in first sentence. Change number of dwellings from '15,400' to ' <b><u>14,000</u></b> '. In the last sentence change April '2009' to ' <b><u>2010</u></b> '.		No Impact
Table 2 (CS7)	Amend figures and table notes to reflect April 2010 baseline and 700 dwelling per annum housing target.		No Impact
8.77 (CS7)	Delete whole paragraph.		No Impact
8.79 (CS7)	Change year '2025' to ' <b><u>2026</u></b> '. Delete last sentence of paragraph:  'The Regional Spatial Strategy advises that for the years beyond 2021, we should assume an annual development requirement of 830 dwellings per year.'		No Impact
8.80 (CS7)	Change year '2025' to ' <b><u>2026</u></b> '.		No Impact
PolicyCS7	Change '5,283' to ' <b><u>3,951</u></b> ' dwellings.		No Impact
8.81 (CS7)	Change year '2009' to ' <b><u>2010</u></b> '.  Change 'under 9,200' to ' <b><u>under 6,800</u></b> ' units.  Delete 'Regional Spatial Strategy'.		No Impact

Policy/ paragraph	Change	Reason	SA Impact
8.82 (CS7)	Change year '2009' to ' <u>2010</u> '.		No Impact
8.83 (CS7)	Change '5,283' to ' <u>3,951</u> ' dwellings.  Add the following text at the beginning of paragraph: <b><u>'The phasing of housing sites will be informed by the findings of the SHLAA, infrastructure delivery and the preparation of master plans.'</u></b>	To reinstate wording and explain phasing in policy.	No Impact
Tables 3 & 4	Revise Figures to reflect new housing target.		SA Impact See Above
<b>CS10 Ipswich Northern Fringe</b>			
8.103 (CS10)	Change 'five year phase and the second six year phase' to ' <u>ten years of the plan period</u> '. Change 'four' to ' <u>five</u> ' years in last sentence of paragraph.	To respond to the revocation of the East of England Plan which may affect the Core Strategy timetable, and accord with PPS3 Housing.	No Impact
Policy	Delete last sentence of first paragraph: 'The precise number of dwellings required will be determined by the review of the Regional Spatial Strategy.'  Delete sentence in second paragraph of policy: 'The new Regional Spatial Strategy that will allocate housing numbers to 2031 will have an impact on the precise scale of any required development in the Northern Fringe.'	The revocation of RSS necessitates changing how the total scale of growth at the Northern Fringe would be determined. This is now deferred to a future review of the Core Strategy rather than to the review of RSS (see also paragraph 8.114 below).	No Impact
Policy CS10 b.	After ' <b><u>alongside all housing</u></b> ' add, ' <b><u>including community facilities and, at an appropriate stage, the provision of a railway crossing to link potential development phases, in the interests of sustainability and integration</u></b> '	Changes also respond at clause b and the penultimate paragraph of the policy, and 8.112 in the explanatory text, to the outcome of the Mersea Homes appeal, which was published on 30 <sup>th</sup> September 2010, and explicitly link policy CS10 with CS16.	SA Impact See Above
Policy CS10	In the penultimate paragraph of the policy add after 'Westerfield Station' ' <b><u>and provide the opportunity for the provision of a country park within the Northern Fringe as envisaged by CS16 and as shall be more particularly identified in the SPD</u></b> '	The Mersea Homes appeal decision is available at Link 3 below.	No Impact
8.106 (CS10)	Delete paragraph 8.106		No Impact

Policy/ paragraph	Change	Reason	SA Impact
8.107 (CS10)	<p>Add the following new text at beginning of paragraph '<b><u>The indicative capacity at the Northern Fringe identified in the Strategic Housing Land Availability Assessment is about 4,500 dwellings. This policy deals with the delivery of up to the first 1,000 of them.</u></b></p> <p>Amend last sentence to read: <b><u>When determining its views on the precise number and timing of delivery of dwellings needed at the Northern Fringe, the Council will use a range of evidence including the Ipswich Housing Needs Study projections for the wider Ipswich area, projections for employment demand, ...</u></b></p> <p>Delete final line 'for the Policy Area and the Borough area.'</p>	As above.	No Impact
8.108 (CS10)	<p>Delete the first two sentences 'The Council will continue to engage with the Regional Assembly in order to ensure that the best interests of the population of Ipswich are considered as part of the Regional Spatial Strategy process. The Council will seek justification of the overall growth numbers, and of the timetable for that expected growth.'</p> <p>Delete reference in third sentence to Ipswich Policy Area and amend to read, '<b><u>... to ensure optimum sustainable distribution of housing within the wider Ipswich area, bearing in mind the amenity value...</u></b></p>		No Impact
8.111 (CS10)	Delete the end of the final sentence ' <b><u>next version of the Regional Spatial Strategy, which will provide a housing target for Ipswich up to around 2031</u></b> ' and replace with ' <b><u>the next review of the Core Strategy.</u></b>	As Above.	No Impact

Policy/ paragraph	Change	Reason	SA Impact
8.112 (CS10 continued)	<p>Add new text to the end of the paragraph: <b><u>'Infrastructure requirements were considered during the appeal by Mersea Homes against the Council's refusal of outline planning permission for major residential led development at the Northern Fringe (application reference IP/09/00465/OUT). The Secretary of State dismissed the appeal on 30th September 2010. Key conclusions about infrastructure provision from the letter and the Inspector's report are reflected in the policy above.'</u></b></p>		No Impact
8.114 (CS10)	<p>Amend first sentence to read <b>'The total number of dwellings likely to be accommodated at the Northern Fringe <u>could be as much as 4,500 in the longer term, but this will be determined through a review of the Core Strategy'</u></b></p> <p>Add new second sentence:- <b><u>'This will provide plenty of opportunity for interested parties – be they developers, landowners, local residents or others – to get involved and have their say prior to the extent of Northern Fringe development being determined.'</u></b></p> <p>Amend third sentence to read <b>'However, to ensure that any development proposed for this area prior to 2021 conforms to a coherent plan, work on the supplementary planning document will commence as soon as the Core Strategy has been adopted.'</b></p> <p>Delete the final sentence 'The supplementary planning document would not be completed until after the next Regional Spatial Strategy is adopted'.</p>	At 8.114, to set out a clear mechanism for the future determination of Northern Fringe development.	No Impact



Policy/ paragraph	Change	Reason	SA Impact
<b>CS11 Gypsy and Traveller Accommodation</b>			
8.116 (CS11)	<p>In the first sentence delete ‘but a single issue review of the Regional Spatial Strategy has concluded that the Borough needs to provide an additional 15 permanent pitches by 2011, and a further 3% per year thereafter to 2021’.</p> <p>After the 1<sup>st</sup> sentence add the sentence <b><u>‘A local assessment of the needs of Gypsies and travellers concluded that 1-3 additional pitches are needed in Ipswich by 2011, plus a transit site in the Ipswich area.’</u></b></p>	To respond to the revocation of the East of England Plan and use local evidence. The Council published a Suffolk Cross-Boundary Gypsy and Traveller Accommodation Assessment (GTAA) in 2007, which concluded that 1-3 pitches were needed in Ipswich by 2011, plus 10 transit pitches. However, the single issue RSS review allocated all districts a minimum requirement (for Ipswich 15 pitches by 2011) to help meet the regional shortfall. Following the revocation of RSS, the Council has reverted to the local evidence of need in the GTAA, but has not altered the policy approach (see Link 4 below).	No Impact Provision is still appropriate to assessed local needs.
8.117 (CS11)	<p>Delete the first sentence ‘As the Core Strategy and Policies will not reach adoption until late 2010, the Council is working in parallel with the plan process to meet the immediate Regional Spatial Strategy requirement.’</p> <p>Amend the end of second sentence to delete reference to 15 itches by 2011 and instead read:- <b><u>‘... to identify possible sites to meet the need to provide additional pitches in the wider Ipswich area.’</u></b></p>		No Impact
Policy	In the penultimate paragraph of the policy, delete the first line ‘In line with Regional Spatial Strategy’	The local GTAA also identified a need for a transit site.	No Impact
8.118 (CS11)	<p>From the third sentence onwards delete ‘... have been set a target in RSS to provide additional pitches in the short and medium term. At present site provision is supported by a national grant scheme to assist in delivery.’ And replace with <b><u>‘All four local planning authorities had needs identified by the Gypsies and Travellers Accommodation Assessment carried out in 2007.’</u></b></p>	The grant scheme referred to has been cancelled (however funding assistance is still available from the Homes and communities Agency).	No Impact
8.120 (CS11)	Delete the first line of the first sentence ‘Contrary to the regional allocation of 15 pitches’ and ‘carried out in 2007’ so that it reads, <b><u>‘The local Gypsy and Traveller Accommodation Assessment identified a need ...’</u></b>		No Impact

Policy/ paragraph	Change	Reason	SA Impact
8.122 (CS11)	Delete 'fifteen pitches identified by the Regional Spatial Strategy Single Issue Review' and replace with ' <b><u>additional pitches</u></b> '	As above	No Impact
<b>CS12 Affordable Housing</b>			
Policy CS12 a.	Change '40%' to ' <b><u>35%</u></b> '	To respond to the revocation of the East of England Plan. Given the ongoing economic conditions, the reduction in the policy to 35% on larger schemes is more realistic. Appendix 4 to the Council report provides evidence of actual affordable housing provision 2001 - 2010.	No Impact Retains a strong commitment to providing affordable housing.
8.126 (CS12)	Delete the entire existing paragraph.	The topic paper Reviewing the Ipswich Housing Figures also provides more background (see Link 2 below).	No Impact
<b>Policy CS13 Planning for Jobs Growth</b>			
Policy CS13	Amend the first sentence to read: ' <b>The Council will promote sustainable economic growth in the <u>wider Ipswich area.</u></b> '	To respond to the revocation of the East of England Plan, which identified the Ipswich Policy Area.  The Council remains committed to cross boundary working to deliver jobs growth, and the joint Employment Land Review for the Suffolk Haven Gateway authorities (2009) recommends this approach (see Link 5 below). Therefore the policy has been amended to refer to the 'wider Ipswich area'. The jobs target has not changed.	No Impact

Policy/ paragraph	Change	Reason	SA Impact
8.140 (CS13)	Delete most of existing paragraph and replace with: <b><u>'Ipswich is a key economic driver of the <i>County and the Haven Gateway</i> area. <i>The Haven Gateway Employment Land Study 2005</i> forecast growth of 17,800 jobs in Ipswich between 2001 and 2021 (see Table 5).'</u></b>	For clarity following the deletion of much of paragraph 8.140.	No Impact
8.141 (CS13)	Before 'joint' in the first sentence add <b><u>'more recent (2009)'</u></b>  Delete 'the three authorities' and add <b><u>'Ipswich Borough Council, Suffolk Coastal District Council and Babergh District Council'</u></b>  After 'Ipswich Policy Area Board' add <b><u>'or other joint working forums'</u></b>	Reference to joint working forums has been added to reflect policy CS6.	No Impact
8.144 (CS13)	Delete 'in the Regional Spatial Strategy'		No Impact
8.145 (CS13)	Delete entire paragraph		No Impact
8.147 (CS13)	In the penultimate sentence delete 'Regional Spatial Strategy' and replace with <b><u>'Employment Land Review'</u></b>		No Impact
<b>Part C Development Control Policies</b>			
DC31	In clause c. delete 'achieving a density of at least 30dph'  Change 'take' to <b><u>'taken'</u></b>	To respond to revisions to PPS3 Housing and the shift in current applications away from flats and towards houses. This change will only affect the more peripheral parts of the borough away from the town and district centres. There remains a general requirement for the efficient use of land in PPS3, and therefore we would not expect to see a significant reduction in densities being achieved. Hence the average of 35 d.p.h. for capacity calculations is retained.	No Impact
<b>Part D Implementation, Targets, Monitoring and Review</b>			
Chapter 10 10.4  Bullet 3	At the end of bullet point 'Ipswich Policy Area Board' add <b><u>'Following revocation of the East of England plan the Board may need to be refocused, for example to relate to a different geography, but the Council remains committed to cross</u></b>	To respond to the revocation of the East of England Plan which identified the Ipswich Policy Area, and ensure consistency with policy CS6 on Cross Boundary Working.  'Previously' refers to the fact that to date RCE has enjoyed the support of the East of England	No Impact

Policy/ paragraph	Change	Reason	SA Impact
Bullet 4	<p><u><i>boundary working on strategic issues.</i></u></p> <p>In bullet point 'Regional Cities East' add <u><i>'previously'</i></u> before 'with support'</p>	<p>Development Agency, but EEDA is to be abolished. It is anticipated that some functions may transfer to new organisations such as Local Enterprise Partnerships in due course.</p>	<p>No Impact</p>

## Schedule of Post Submission Proposed Minor Amendments, October 2010

Policy/ paragraph	Change	Reason	SA Impact
<b>Chapter 1 Introduction</b>			
1.3	Delete 'regional and' from the second sentence.	To respond to the revocation of the East of England Plan.	No Impact
1.8	Change year '2025' to ' <b>2026</b> ' in first sentence.  At the end of the second sentence, delete 'as required by the government to meet targets set out in the Regional Spatial Strategy for the East of England.' And insert in its place: ' <b><u>in the evidence base which underpins the plan.</u></b> '	Correction to reflect the timeframe set out elsewhere in the plan (e.g. see amendment to CS7 approved in March 2010).  To respond to the revocation of the East of England Plan.	No Impact
1.11	Add ' <b>sub</b> ' to read sub-regional in first and last sentence of paragraph.	To respond to the revocation of the East of England Plan and the fact that studies and strategies exist at a county level and for the Haven Gateway.	No Impact
Diagram 1	Delete 'Regional Spatial Strategy & Implementation Plan' and 'Regional Economic Strategy' from the diagram.	To respond to the revocation of the East of England Plan.	No Impact
Part A			
<b>Chapter 2 The New Planning System</b>			
2.1	Delete from second sentence 'a Regional Spatial Strategy'.	To respond to the revocation of the East of England Plan.	No Impact
2.3	Delete from first sentence 'the Regional Spatial Strategy, which is adopted by the Government, and'.  Delete last sentence 'Further information on the Regional Spatial Strategy is contained in Chapter 3'	To respond to the revocation of the East of England Plan.	No Impact
<b>Chapter 3 The Regional Spatial Strategy</b>			
Chapter 3 (also in contents list)	Change to chapter title from 'The Regional Spatial Strategy' to ' <b><u>The Strategic Context</u></b> '	To respond to the revocation of the East of England Plan (Regional Spatial Strategy) and explain the context for the plan.	No Impact
3.1	Amend existing paragraph to read as follows: <b>In May 2008 the Government adopted the East of England Plan as the Regional Spatial Strategy for Eastern England up to the year 2021. <u>At the time it formed</u> part of the Ipswich development plan, together with adopted local policy.</b>	To respond to the revocation of the East of England Plan.	No Impact

Policy/ paragraph	Change	Reason	SA Impact
	Delete at the beginning of the third sentence 'Currently the' and move remaining text to paragraph 3.4 (see below). Add new final sentence to 3.1: <b><u>'The Regional Spatial Strategy provided the regional policy context for the emerging Core Strategy and Policies DPD during its preparation. The key policies that affected Ipswich are outlined in the box.'</u></b>		
3.2	Delete existing paragraph 3.2 and add new paragraph: <b><u>However, on the 6<sup>th</sup> of July 2010, the new Government announced that Regional Strategies were revoked with immediate effect. Local planning authorities may now choose whether to retain policies and targets flowing from revoked Regional Spatial Strategies, or to review affected parts of development plan documents. The key piece of advice from the Government is that policies should be evidence based, whether using the same evidence that underpinned the RSS, or different evidence.</u></b>	To respond to the revocation of the East of England Plan and reflect the Secretary of State's letter of 6 <sup>th</sup> July 2010.	No Impact
3.3	Delete existing paragraph and add a new paragraph 3.3: <b><u>There remains in place at the highest strategic level the national layer of planning policy set out in planning policy guidance notes and statements. These informed both the Core Strategy and the Regional Spatial Strategy directly.</u></b>	To clarify that in the absence of the East of England Plan, there remains a layer of national planning policy.	No Impact
3.4	Delete existing paragraph 3.4. Add a new paragraph 3.4 consisting of remaining text from paragraph 3.1.  <b><u>Local policy is saved policies from the 1997 adopted Ipswich Local Plan. Gradually these will be replaced by the development plan documents being prepared by the Borough Council, the first of which is this Core Strategy and Policies. Appendix 2 indicates which saved policies will be superseded by this plan.</u></b>	To respond to the revocation of the East of England Plan and retain reference to the saved Local Plan policies and Appendix 2.	No Impact
Shaded box 'East of England Plan'	Change 'is' to ' <b><u>was</u></b> ' in first and second sentences.	To respond to the revocation of the East of England Plan.	No Impact

Policy/ paragraph	Change	Reason	SA Impact
<b>Chapter 5 Ipswich: The Place</b>			
5.3	Delete from first sentence 'in delivering growth and performing'.  Delete last sentence 'The regional role of Ipswich and its local challenges are recognised in the town's East of England Plan designations (see Chapter 3).'	To respond to the revocation of the East of England Plan, which provided the regional growth context.	No Impact
5.7	Delete ',regional' in last sentence so that it reads '... at a central and local government level, ...'.	To respond to the revocation of the East of England Plan.	No Impact
5.30	Change year '2025' to ' <b>2026</b> ' in first sentence.	Correction to reflect timeframe set out elsewhere in the plan.	No Impact
Part B			
<b>Chapter 6 Vision and Objectives</b>			
6.2	Delete from last sentence 'and to the Regional Spatial Strategy.'	To respond to the revocation of the East of England Plan.	No Impact
6.7	Change year '2025' to ' <b>2026</b> ' in second paragraph.	Correction to reflect timeframe set out elsewhere in the plan.	No Impact
6.10	Delete from second sentence 'accords with the Regional Spatial Strategy, and at the same time' so that it reads ' <b>This helps to deliver ...</b> '	To respond to the revocation of the East of England Plan	No Impact
6.11	Delete from first sentence 'reflects Ipswich's status as a regional priority area for regeneration, to' and add ' <b>helps to</b> ' so that it reads ' <b>The strategy also helps to address ...</b> '	To respond to the revocation of the East of England Plan which identified Ipswich as a regional priority area for regeneration.	No Impact
6.14	Change April '2025' to ' <b>2026</b> ' and '8,300' to ' <b>7,500</b> ' dwellings.	Correction to reflect timeframe set out elsewhere in the plan and to reflect changes made to respond to the revocation of the East of England Plan.	No Impact
6.18	Change 'is' to ' <b>was</b> '.	To respond to the revocation of the East of England Plan	No Impact
<b>Chapter 8 Development of the Strategy</b>			
8.4	Policy CS6 title changed from 'The Ipswich Policy Area' to ' <b>Cross Boundary Working</b> '	To respond to the revocation of the East of England Plan, which identified the Ipswich Policy Area (see also focused changes to Policy CS6).	No Impact
8.10 (CS1)	Delete 'and the Regional Spatial Strategy (e.g. Policy SS1)' from last sentence.	To respond to the revocation of the East of England Plan	No Impact

Policy/ paragraph	Change	Reason	SA Impact
8.14 (CS1)	Change ' during 2010' to ' <b><i>when the Core Strategy is adopted</i></b> ' in last sentence.	The original wording reflected an expectation that the Core Strategy would, if found sound, be adopted in the autumn of 2010 and the SPD would follow on from it. However, the suspension of the Examination process due to the revocation of the East of England Plan has changed the timescale for adoption, which has a knock-on effect for other work.	No Impact
8.16 (CS1)	Delete sentences 3, 4 and 5 'RSS Policy ENG1 sets out an interim requirement that major developments should secure at least 10% of their energy from decentralised and renewable or low carbon sources, until Development Plan Documents could set local targets. Policy ENG2 sets a target for 17% of the region's energy to come from renewable sources by 2020. Because Ipswich is a growth point, setting a target higher than 10% for renewable and low carbon energy in new buildings will help to meet the regional target for energy from renewables.'  Amend next sentence to read: <b><i>Setting a 15% target for Ipswich will also help to make a significant impact on reducing carbon emissions because buildings are a major source of emissions in Ipswich.</i></b>	To respond to the revocation of the East of England Plan. The Council's Renewable Energy and Sustainable Construction Viability Study provides more information (see Link 1 below).	No Impact
8.28 (CS2)	Delete 'PPS6' and add ' <b><i>4 (PPS4) Planning for Sustainable Economic Growth,</i></b>	Correction to reflect the fact that PPS6 has been superseded by PPS4 (already picked up elsewhere in the plan).	No Impact
8.29 (CS2)	Change 'PPS6' to ' <b><i>PPS4</i></b> ' in first sentence.  Delete 'as required by Regional Spatial Strategy Policy E3,' in second sentence.	Correction to reflect the fact that PPS6 has been superseded by PPS4 (already picked up elsewhere in the plan). To respond to the revocation of the East of England Plan	No Impact
CS4	In footnote 2 on page 43, change 'are shortly to be' to ' <b><i>have now been</i></b> '.	To reflect the fact that PPS5 has been published.	No Impact
8.57 (CS5)	Delete existing paragraph 8.57 'The Regional Spatial Strategy sets out transport objectives to:  <ul style="list-style-type: none"> <li>Manage travel behaviour and the demand for</li> </ul>	To respond to the revocation of the East of England Plan and reflect the context provided by national guidance and the Suffolk Local Transport Plan (see links 2 and 3 below).	No Impact



Policy/ paragraph	Change	Reason	SA Impact
	<p>transport;</p> <ul style="list-style-type: none"> <li>• Encourage the efficient use of existing transport infrastructure;</li> <li>• Enable the provision of the infrastructure and transport services necessary to support communities and growth; and</li> <li>• Improve access to jobs, services and leisure facilities.'</li> </ul> <p>Add the following text as new paragraph 8.57:</p> <p><b><u>Planning Policy Guidance Note 13 Transport has the objective of integrating planning and transport to:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Promote more sustainable transport choices for people and freight movements;</u></b></li> <li>• <b><u>Promote accessibility to jobs, shops, leisure facilities and services by public transport, walking and cycling; and</u></b></li> <li>• <b><u>Reduce the need to travel, especially by car.</u></b></li> </ul> <p><b><u>This is complemented at the sub-regional level by the Suffolk Local Transport Plan. As well as county-wide objectives, it also identifies specific objectives for Ipswich and its wider area as follows.</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Relieve congestion in and around Ipswich town centre;</u></b></li> <li>• <b><u>Significantly improve bus and rail interchanges and facilities in Ipswich and ensure that the transport network caters to the needs of all users;</u></b></li> <li>• <b><u>Maintain and improve Suffolk's transport network to support safe travel and</u></b></li> </ul>		

Policy/ paragraph	Change	Reason	SA Impact
	<p><u><i>access in the Haven Gateway sub-region; and</i></u></p> <ul style="list-style-type: none"> <li><u><i>Work with the Highways Agency to better manage and target investment on the A14 and improve safety by reducing conflicts between passenger transport and freight.</i></u></li> </ul>		
8.72	<p>Delete 'the Regional Spatial Strategy requirement to provide at least an additional 15,400 homes in Ipswich in the period from 2001 to 2021' and add '<b><u>delivering new homes.</u></b>' at the end of paragraph.</p> <p>The amended sentence reads: <b>'This section addresses the strategic issues associated with <u>delivering new homes.</u>'</b></p>	To respond to the revocation of the East of England Plan.	No Impact
8.98 (CS9)	Delete second sentence 'The Regional Spatial Strategy takes this target and incorporates employment development also, so that 60% of all development is to take place on previously developed land (Policy SS2).'	To respond to the revocation of the East of England Plan.	No Impact
8.99 (CS9)	Change year '2009' to ' <b><u>2010</u></b> '.	To respond to the revocation of the East of England Plan.	No Impact
8.100 (CS9)	Amend last sentence to read: Of the SHLAA supply, approximately <del>66%</del> <b>63%</b> is previously developed land and <del>33%</del> <b>37%</b> greenfield land, <b><u>excluding planning permissions.</u></b>	To respond to the revocation of the East of England Plan and consequent updating of figures to April 2010.	No Impact
8.124 (CS12)	Delete the final sentence 'Regional Spatial Strategy sets a target for 35% of housing coming forward across the region to be affordable.'	To respond to the revocation of the East of England Plan	No Impact
8.127 (CS12)	Before 'toolkit' remove ' <b>the Council's</b> ' and replace with ' <b><u>a recognised</u></b> '	To enable other recognised tools such as the Homes and Communities Agency's viability assessment tool to be used for viability assessments, as referred to in 'Delivering Affordable Housing' (CLG, 2006).	No Impact
8.129 (CS12)	Change '40%' to ' <b><u>35%</u></b> '	To reflect the change to Policy CS12.	No Significant Impact
8.136 (CS13)	Amend last sentence to read, ' <b>This section addresses the strategic issues associated with <u>the provision of additional jobs in Ipswich Borough over the plan period.</u></b> '	To respond to the revocation of the East of England Plan	No Impact
8.139 (CS13)	Delete from the 1 <sup>st</sup> sentence 'a key centre for development and change' and combine remainder with second sentence so that it reads: <b>'Ipswich is a growth point and whilst</b>	To respond to the revocation of the East of England Plan, which identified Ipswich as a key centre for development and change.	No Impact

Policy/ paragraph	Change	Reason	SA Impact
	the focus of monitoring ...'		
8.153 (CS14)	Delete the first sentence 'The Regional Spatial Strategy identifies Ipswich town centre of strategic importance for retail and other town centre purposes (RSS Policy E5)'	To respond to the revocation of the East of England Plan	No Impact
8.154 (CS14)	Amend the first sentence to read:- <b>'Within the wider Ipswich area the population is forecast...'</b>	To respond to the revocation of the East of England Plan which identified the Ipswich Policy Area, and reflect the Ipswich Retail Study update 2010 which looks at the whole catchment area for Ipswich town centre (see Link 4 below).	No Impact
8.157 (CS14)	Delete the end of the final sentence 'defined in the East of England Plan.'	To respond to the revocation of the East of England Plan	No Impact
8.179 (CS16)	Delete existing paragraph and replace with  <b><u>'Planning Policy Guidance 17 Planning for Open Space, Sport and Recreation requires local authorities to set local standards for open space, sport and recreation facilities, based on a local assessment of needs. It also states that existing sites and facilities should not be built on unless they have been shown to be surplus.'</u></b>	To respond to the revocation of the East of England Plan and highlight the national policy context in PPG17.	No Impact
8.188 (CS16)	First line delete 'Regional Spatial Strategy' and replace with <b><u>'Council'</u></b>	To respond to the revocation of the East of England Plan	No Impact
8.193 (CS17)	First line delete 'requirements'	To respond to the revocation of the East of England Plan which imposed a requirement.	No Impact
8.199 (CS17)	Delete '2009' replace with <b><u>'2010'</u></b>	To respond to the revocation of the East of England Plan and reflect that housing figures have been updated to a 2010 baseline.	No Impact
8.208 (CS19)	At the end of 'c.' delete '2012/13' and replace with <b><u>'2014'</u></b>	Update for consistency within the plan.	No Impact
8.210 (CS19)	Delete '2013' replace with <b><u>'2014'</u></b>	Update for consistency within the plan	No Impact
8.215 (CS19)	Delete 'Regional Spatial Strategy' Delete '2025' and replace with <b><u>'2026'</u></b>	To respond to the revocation of the East of England Plan and reflect the timescale for the plan.	No Impact

Policy/ paragraph	Change	Reason	SA Impact
8.219 (CS19)	Amend the end of the first sentence to read: <b>'future growth of Ipswich and the <u>wider Ipswich area.</u></b>	To respond to the revocation of the East of England Plan, which identified the Ipswich Policy Area.	No Impact
<b>Part C Development Control Policies</b> <b>Chapter 9 Development Control Policies</b>			
Chapter 9 9.2	First bullet point delete 'or regional'	To respond to the revocation of the East of England Plan	No Impact
9.4 (DC1)	Delete 'regional and'	To respond to the revocation of the East of England Plan	No Impact
9.5 (DC1)	Delete 'The East of England Plan emphasises the ... of this agenda ... the region ... by highlighting ...' and amend the first sentence to read: <b>'<u>This agenda is of particular importance to Ipswich because of its particular vulnerability to the effects of climate change...</u></b>  At the end of paragraph delete 'for the region' and the final sentence 'Policies ENV7, WAT1, ENG1 and ENG2 of the East of England Plan all address the issue.'	To respond to the revocation of the East of England Plan	No Impact
9.9 (DC1)	Delete the final sentence 'East of England Plan Policy WM6 requires major developments to make provision for waste management facilities and consider innovative approaches to waste management, which could link to renewable energy'	To respond to the revocation of the East of England Plan	No Impact
9.17 (DC2)	Delete 'and regional policies ENG1 and ENG2'	To respond to the revocation of the East of England Plan	No Impact
9.18 (DC2)	After 'vulnerability of' delete <b>'the region'</b> and add <b>'<u>Ipswich</u></b>  Before 'accommodate' delete 'be required to'.  In the final line delete 'the 17% regional target for 2020' and replace with <b>'<u>national targets.</u></b>	To reflect Ipswich's vulnerability to climate change effects such as sea level rise, and to respond to the revocation of the East of England Plan, which gave the Borough a growth requirement and renewables targets.	No Impact
9.69 (DC8)	Delete the entire paragraph.	To respond to the revocation of the East of England Plan	No Impact
9.90 (DC16)	Delete 'The East of England Plan identifies' Delete 'as' and replace with <b>'<u>is</u></b> so the sentence reads <b>'Ipswich is a regional</b>	To respond to the revocation of the East of England Plan	No Impact

Policy/ paragraph	Change	Reason	SA Impact
	transport node ...'		
9.117 (DC21)	Replace 'PPS6' with ' <b><u>PPS4</u></b> '	Correction to reflect the fact that PPS6 has been superseded by PPS4 (already picked up elsewhere in the plan).	No Impact
9.130 (DC25)	Change '40%' to ' <b><u>35%</u></b> '	To ensure consistency with policy CS12.	No Impact
9.133 (DC26)	Delete the first line 'The East of England Economic Strategy states that' and replace with ' <b><u>In Ipswich</u></b> '  After 'employment sites' delete 'are' and replace with ' <b><u>have come</u></b> ' so the sentence reads ' <b><u>In Ipswich employment sites have come under increasing pressure ...</u></b> '  Change 'PPS6' to ' <b><u>PPS4</u></b> '	To respond to the revocation of the East of England Plan and reflect the fact that locally former employment sites such as Compair Reavell, Ranelagh Road, have been developed for housing.  Correction to reflect the fact that PPS6 has been superseded by PPS4 (already picked up elsewhere in the plan).	No Impact
9.134 (DC26)	Delete 'as set out in the East of England Plan.'	To respond to the revocation of the East of England Plan	No Impact
DC32	Add heading: ' <b><u>NATURAL ENVIRONMENT</u></b> '	For clarity	No Impact
DC33	Add heading: ' <b><u>COMMUNITY FACILITIES</u></b> '	For clarity	No Impact
<b>Part D Implementation, Targets, Monitoring and Review</b>			
<b>Chapter 10 Implementation</b>			
10.5 b.	In bullet point b. delete 'East of England Development Agency, Government for the East of England and the'  Delete the final sentence 'It is anticipated that the regional agencies will use IDPs to prioritise their funding'	To respond to the Government's changes to regional organisations.	No Impact
<b>Chapter 11 Key Targets Associated with Part B</b>			
Chapter 11 11.6	Objective 3: change '15,400' to ' <b><u>14,000</u></b> ' and '2025' to ' <b><u>2026</u></b> '  Amend objective 3.b) to read: ' <b>18,000 additional jobs shall be provided in <u>the wider Ipswich area</u> between 2001 and 2025.</b> '  Targets: change from '15,400 homes' to ' <b><u>14,000 homes by 2021</u></b> ' and '2021' to ' <b><u>2025</u></b> '  Objective 12: Indicator 1 should read ' <b>Joint working taking place through the IPA Board <u>(or other equivalent</u></b>	For consistency with the Objectives in paragraph 6.8 and with policy CS6.	No Impact

Policy/ paragraph	Change	Reason	SA Impact
	<b>forum) or the Haven Gateway Partnership.'</b>		
<b>Chapter 12 Monitoring and Review</b>			
Chapter 12 12.3	Delete ' the production of the next version of the Regional Spatial Strategy, which is scheduled for adoption in 2011 and which will look to the period to 2031' and replace with ' <b><u>significant new evidence becoming available, and issues being identified through the Annual Monitoring Report.</u></b> '	To respond to the revocation of the East of England Plan and indicate when a review would be triggered.	No Impact
<b>Part E Appendices</b>			
Appendix 1	Add policy titles to list: <b><u>Natural Environment</u></b> for policy DC32 and  <b><u>Community Facilities</u></b> for policy DC33.	For internal consistency and clarity.	No Impact
Appendix 2	First paragraph, after 'National' delete 'and regional'  Delete 'and Regional Spatial Strategy policies' after Planning Policy Statements.	To respond to the revocation of the East of England Plan	No Impact
Appendix 2 Table 7	Delete references to RSS from the 'National/Regional Policy' column of the table.	To respond to the revocation of the East of England Plan	No Impact