



Strategic Environmental Assessment and Sustainability Appraisal

Ipswich Garden Suburb SPD

Addendum to the Sustainability Appraisal Report

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Ipswich Borough Council

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Ipswich Garden Suburb SPD

Addendum to the Sustainability Appraisal Report

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1 Introduction

1.1 Purpose of this Addendum

- 1.1.1 Ipswich Borough Council (IBC) is in the process of preparing its 'Ipswich Garden Suburb' Development Brief Supplementary Planning Document (SPD). As part of the SPD preparation process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) was undertaken in September 2013 to assess the potential effects from the implementation of the SPD.
- 1.1.2 Following consultation on the draft SPD, a number of changes have been made which require review through the SA process. This report addresses those changes and updates the findings of the 2013 SA Report. It should be read as an addendum to the 2013 SA Report.

1.2 Background to the Ipswich Garden Suburb SPD

- 1.2.1 The Ipswich Garden Suburb SPD is intended to expand upon the requirements of the Core Strategy's Policy CS10, which identified the area as the location of major development of up to 4,500 dwellings and associated facilities. Whilst it is Policy CS10 that identifies the principle of the land for development, it also states that the adoption of the SPD is a prerequisite for any development being granted planning permission.
- 1.2.2 The requirements of CS10 include guidance with regard to the development of the whole Ipswich Garden Suburb area including relevant infrastructure and community facilities. In order to fulfil these requirements, the SPD addresses a range of planning, design and delivery issues. Part A of the SPD establishes the Council's vision and objectives, and the overall approach to guide the detailed master planning and design of the development. Part B sets out the Council's expectations about how the vision and objectives will be realised in relation to the planning application process, community and infrastructure development and overall management. The SPD has been prepared in accordance with the Town and Country Planning Regulations 2012 and it does not introduce any new policies.
- 1.2.3 The SPD was issued for consultation to all key stakeholders (including statutory consultees and the public) from Monday 13th January 2014 to Monday 10th March 2014 for comment. Following the close of the consultation period, IBC reviewed the feedback and revised the SPD as appropriate. This updated version of the SPD is known as the Publication SPD.
- 1.2.4 The minor modifications proposed by IBC are intended to improve the SPD i.e. to provide clarity or consistency, or to correct errors. The changes have occurred as a result of the responses received and as a result of developed thinking on the strategic nature of the developments and how they could come forward.

1.3 The SA Process

- 1.3.1 SA (incorporating the requirements of the SEA Directive¹) was undertaken on the Ipswich Garden Suburb SPD throughout its development. SA is a tool for ensuring that the principles of sustainable development are inherent throughout the preparation of the Ipswich Garden Suburb SPD and that it broadly complies with the relevant planning guidance. The overarching aim of the process is to contribute to better decision-making and planning. SA is an iterative process and follows a series of prescribed stages in which the elements of the Ipswich Garden Suburb SPD are appraised against Sustainability Objectives, to encourage the selection of the most sustainable options and to ultimately improve the sustainability of the development / guidance that is brought forward.
- 1.3.2 The SA Report was issued for consultation alongside the 'Ipswich Garden Suburb' SPD from January to March 2014. Minor modifications were made to the SPD following this consultation. This assessment considers whether there are any impacts relating to the SA assumptions or findings as a result of the proposed modifications to what is now the Publication version of the 'Ipswich Garden Suburb' SPD. The changes made to the SPD are only considered to be minor matters – they do not relate to the soundness or legal compliance of the document and do not materially alter it. As such, an assessment of the minor modifications has been undertaken and is presented in this report to identify if the existing SA findings need to be amended or still stand.
- 1.3.3 Table 2-1 in section 2 of this report identifies the minor modifications that have been proposed by IBC together with a review of the potential sustainability implications and whether or not any further SA is required.
- 1.3.4 Section 3 of this report identifies some additional recommendations from the SA process which have come to light through the consultation and this review.

¹ Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, June 2001

2 Review of significant changes to the SPD

Table 2-1 Assessment of the significance of the modifications of the 'Ipswich Garden Suburb' SPD

Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
M1	Foreword by Portfolio Member	<p>To reflect the recommended change in status the foreword is updated and is clearer on some of the concerns raised in relation to present draft. The updated foreword covers the following points:</p> <ul style="list-style-type: none"> • Background to the site allocation and implications of the Core Strategy Focused Review; • Importance of the SPD and why it is necessary; • Role of 'garden suburb' principles and overview of what is proposed for the site • Features of the site and connections outside the site; • Consultation undertaken and main concerns received; • How concerns raised have sought to be addressed in the interim guidance; • Role of interim guidance and next steps for full adoption. 	The changes simply provide an update of the development of the SPD and additional background information.	No further SA assessment required.
M3	Page 23	<p>New paragraph 2.26:</p> <p>Proposals should recognise and take account of the wider historical and cultural heritage of the site. This includes identifying and taking opportunities to conserve the setting of listed buildings which are in close proximity to the site.</p>	The additional paragraph would not change the previous SA assessment as it only strengthens the vision by reinforcing the importance of listed buildings and cultural heritage. Beneficial effects against SA objective ET9 ' <i>To conserve and where appropriate enhance areas and sites of historical importance</i> '	No further SA assessment required.
M3	Para 2.50, (page 26)	<p>Current draft of paragraph 2.50</p> <p>A new road bridge over the Ipswich to Lowestoft / Felixstowe railway line will be provided to ensure a high level of connectivity between different parts of the site. A new pedestrian / cycle bridge will replace the existing sub-standard at grade crossing where Fonnereau Way currently crosses the railway line.</p> <p>Text is amended to reinforce the need for bridges in the interests of sustainability of the site</p>	The additional text to paragraph 2.50 would not change the previous SA assessment as it simply updates and strengthen the vision by providing additional provisions relating to connectivity and the promotion of	No further SA assessment required.

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Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
		<p>and use by sustainable modes. So the paragraph now reads:</p> <p>Revised paragraph 2.50</p> <p>In the interests of securing effective connections between all neighbourhoods and creating sustainable communities which have easy access to full range of services and community facilities in each neighbourhood, a new road bridge over the Ipswich to Lowestoft / Felixstowe railway line will be provided to ensure a high level of connectivity between different parts of the site for various modes of transport including foot, cycle and bus. A new pedestrian / cycle bridge will replace the existing sub-standard at grade crossing where Fonnereau Way currently crosses the railway line.</p>	<p>sustainable modes of transport to mitigate against climate change and air pollution.</p>	
M4	Para 3.12 (page 38)	<p>In response to comments from the Parks and Open Spaces service it is advised that reference is made to the council's Open Space and Biodiversity Policy. On that basis it is considered most appropriate to add this to the 'Public Open Space & Green Infrastructure' section of chapter 3. The following additional wording is to be added to the second sentence of paragraph 3.12 "...which accords with planning policy and the Council's 'Open Space and Biodiversity Policy'.</p> <p>Current draft of paragraph 3.12</p> <p>In keeping with the garden suburb tradition, landscape character and green open spaces will be the key defining feature of Ipswich Garden Suburb. The Council will require applicants to demonstrate high standards for the design, specification and maintenance of all landscape elements in order to secure an appropriate quality over the short, medium and long term life of the development. Landscape strategies and landscape design codes will be expected to accompany any outline planning application(s). This will apply to all landscape areas including the public realm within the built up areas.</p> <p>Revised paragraph 3.12</p> <p>In keeping with the garden suburb tradition, landscape character and green open spaces will be the key defining feature of Ipswich Garden Suburb. The Council will require applicants to demonstrate high standards for the design, specification and maintenance of all landscape elements in order to secure an appropriate quality over the short, medium and long term life of the development which accords with planning policy and the Council's Open Space and Biodiversity Policy. Landscape strategies and landscape design codes will be expected to</p>	<p>The additional wording would not change the previous SA as it simply adds a reference to the Council's 'Open Space and Biodiversity Policy' which provides guidance for the quantity, quality, accessibility and management of open space provision within development.</p>	<p>No further SA assessment required.</p>

Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
		accompany any outline planning application(s). This will apply to all landscape areas including the public realm within the built up areas.		
M5	Para 3.15, page 39	<p>In response to comments from Natural England, insert as a second sentence, “The country park is required as necessary mitigation to divert additional recreational pressure, associated with development, away from European sites such as the Stour and Orwell Estuaries SPA and Ramsar site.</p> <p>Current draft of paragraph 3.15</p> <p>A new country park will be a defining feature of the Ipswich Garden Suburb and an integral component of the development with a high priority attached to early delivery. The country park will also play a key role in maintaining the physical separation of Westerfield village from the built up area of Ipswich and in accommodating sustainable drainage.</p> <p>Revised paragraph 3.15</p> <p>A new country park will be a defining feature of the Ipswich Garden Suburb and an integral component of the development with a high priority attached to early delivery. The country park is required as necessary mitigation to divert additional recreational pressure, associated with development, away from European sites such as the Stour and Orwell Estuaries SPA and Ramsar site. The country park will also play a key role in maintaining the physical separation of Westerfield village from the built up area of Ipswich and in accommodating sustainable drainage.</p>	The amendment would not change the previous SA assessment as the change simply strengthens the role of the country park adding some borough-wide benefits with regard to ecology and reducing the potential impacts on European Sites.	No further SA assessment required.
M6	Para 3.17 (page 39)	<p>In response to comments relating to this paragraph not according with policy DM29, an amendment to change the wording from “requires” to “seeks” within the first sentence is considered appropriate.</p> <p>Current draft of paragraph 3.17</p> <p>In addition, the Council requires a minimum of 10% of land within the net residential areas to be provided as public open space. This space will be required to accommodate sustainable urban drainage (SuDS), retained trees and hedgerows, and to provide an attractive “garden suburb” character to each residential area. The preliminary SuDS strategy indicates that this 10% figure may need to be increased to 12% in some locations to provide sufficient space for SuDS.</p>	The amendment would not change the previous SA assessment as the change of wording only ensures the text is in accordance with policy DM29 ‘ <i>Provision of new open space, sport and recreation facilities</i> ’, in the Draft Core Strategy Focused Review without changing the expectation of open space to be provided.	No further SA assessment required.

Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
		<p>Revised paragraph 3.17</p> <p>In addition, the Council seeks a minimum of 10% of land within the net residential areas to be provided as public open space. This space will be required to accommodate sustainable urban drainage (SuDS), retained trees and hedgerows, and to provide an attractive “garden suburb” character to each residential area. The preliminary SuDS strategy indicates that this 10% figure may need to be increased to 12% in some locations to provide sufficient space for SuDS.</p>		
M7	Para 3.26 (page 42)	Amend ‘A reserved site for a health centre (D1)’ to ‘A health centre (D1)’.	The amendment would not change the previous SA assessment as it only lists the specific facilities within the district centre that are expected to be included with regard to land use.	No further SA assessment required.
M8	Para 3.43 (page 45)	<p>Current draft of paragraph 3.43</p> <p>Notwithstanding the above, the Council expects that 9ha of land will be reserved for a secondary school in both Fonnereau and Henley Gate neighbourhoods (sittings to be agreed with IBC and shown in any alternative Infrastructure Delivery Plan prepared and agreed by all landowners) in the event that a serviced site with access roads in Red House neighbourhood cannot be transferred to Suffolk County Council as Local Education Authority immediately following the occupation of 500 dwellings across the entire site, which may occur if the developer of Red House neighbourhood has not exercised their option agreement for the purchase of this land area by this point. To achieve a sustainable development of the Ipswich Garden Suburb a secondary school is required to commence no later than the occupation of 500 dwellings, and therefore the provision of alternative options would allow for any development in Fonnereau and/or Henley Gate to continue without the potential uncertainty of when land in Red House would be released. However, the secondary school in Red House remains the Council’s strongest preference and this will be pursued in line with the Framework Plan where development has commenced in this neighbourhood prior to the occupation of 500 dwellings.</p> <p>Revised paragraph 3.43</p> <p>The preferred location for the secondary school is shown in figure 5 (Development Framework</p>	The revised paragraph does not change the previous SA assessment as the change simply allows flexibility with regard to the potential site for a secondary school but the provision of a secondary school is warranted.	No further SA assessment required.

Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
		<p>Plan) and is located in the Red House neighbourhood. It has been identified based on pupil forecasts from Suffolk County Council as Local Education Authority that a secondary school will be needed by 2021 and therefore a serviced site with suitable access and drainage is required to be transferred to Suffolk County Council by 2018. The Infrastructure Delivery Plan which is to be agreed with IBC and Suffolk County Council, and prepared and agreed by all landowners, shall set out the arrangements required (such as a land transfer agreement, service provision for the site etc.) to secure delivery of the secondary school no later than 2021, unless it is demonstrated that projected delivery, phasing and other mitigation in the form of temporary accommodation suggests an alternative timetable and is agreed between developers, IBC and Suffolk County Council. In the event that the Red House site is not available at the required time, the Infrastructure Delivery Plan may need to identify the provision of a site in either the Fonnereau or Henley Gate neighbourhoods, whilst alternative purchase options will need to be explored by Suffolk County Council beyond the anticipated method of securing the site through a planning obligation. Notwithstanding the route of securing a satisfactory land transfer for the new secondary school, the arrangements for this must be in place prior to the commencement of development in IGS.</p>		
M9	Para 4.10 (page 58)	<p>In response to comments from Natural England insert as a second sentence “It is expected that the country park be appropriately designed and managed to deliver the necessary mitigation to divert the additional recreational pressure from other European SPA and Ramsar sites”.</p> <p>Current draft of paragraph 4.10</p> <p>Ipswich Borough Council, in consultation with relevant stakeholders, will prepare a detailed development brief for the country park prior to the commencement of its construction. It is anticipated that developers will lead on the delivery of the country park in collaboration with the Borough Council, Suffolk Coastal District Council and others. The brief will include a strategy for the delivery use, management and maintenance of the country park. It is envisaged that the Borough Council will manage the park in perpetuity through the acquisition of the freehold.</p> <p>Revised paragraph 4.10</p> <p>Ipswich Borough Council, in consultation with relevant stakeholders, will prepare a detailed development brief for the country park prior to the commencement of its construction. The country park will expect to be appropriately designed and managed to deliver the necessary</p>	<p>The amendment would not change the previous SA assessment as the change simply strengthens the role of the country park adding some borough-wide benefits with regard to ecology and reducing the potential impacts on European Sites.</p>	<p>No further SA assessment required.</p>

Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
		mitigation to divert the additional recreational pressure from other European SPA and Ramsar sites. It is anticipated that developers will lead on the delivery of the country park in collaboration with the Borough Council, Suffolk Coastal District Council and others. The brief will include a strategy for the delivery use, management and maintenance of the country park. It is envisaged that the Borough Council will manage the park in perpetuity through the acquisition of the freehold.		
M10	Para 4.22 (page 62)	<p>Change wording in para. 4.22 (tenth bullet point) from 'jointly liable' to 'expected'.</p> <p>Current draft of paragraph 4.22, tenth bullet point</p> <p>In the event of there being no site-wide outline planning application and masterplan, planning applications for each neighbourhood shall incorporate a robust strategy to ensure delivery of adequate provision of sports facilities for the residents of that particular neighbourhood. Developers will be jointly liable to contribute to strategic facilities.</p> <p>Revised draft of paragraph 4.22, tenth bullet point</p> <p>In the event of there being no site-wide outline planning application and masterplan, planning applications for each neighbourhood shall incorporate a robust strategy to ensure delivery of adequate provision of sports facilities for the residents of that particular neighbourhood. Developers will be expected to contribute to strategic facilities.</p>	The replacement of wording does not change the previous SA as the intention to provide strategic facilities is broadly the same.	No further SA assessment required.
M11	Para 4.28 (page 64)	<p>In response to the Design Review Panel comments, additional references were made to food production opportunities. The Landscape & Open Space Typologies identifies two potential locations for allotments but other opportunities could be found throughout IGS and this is reflected in para 4.28. Reference to community orchards is also removed.</p> <p>Current draft of paragraph 4.28</p> <p>Areas for food production should be provided at several locations across the site. There are a number of ways in which this requirement can be met, and the Council anticipates a number of solutions will be provided:</p> <ul style="list-style-type: none"> • Allotments for rent by local people. Plots should be grouped together and should be enclosed using appropriate fencing and hedging; facilities should be in secure, accessible locations with good road access and parking facilities with power and water available. Two or three strategically located allotment sites will be deemed appropriate. 	The changes would not change the previous SA assessment as the changes simply update the spatial strategy and provides further details of potential locations for allotments. Removing the community orchards will have a negligible effect on the previous SA assessment.	No further SA assessment required.

Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
		<ul style="list-style-type: none"> • Community gardens, managed and maintained on behalf of the community, with community participation; and • Community orchards. These can be planned in linear form to line recreation routes, and can accommodate a variety of native, flowering edible fruit trees. <p>Revised paragraph 4.28</p> <p>Areas for food production should be provided at several locations across the site. There are a number of ways in which this requirement can be met, and the Council anticipates a number of solutions will be provided in locations that are not only noted in Figure 10 but potential opportunities for the incorporation of food production areas within blocks and maximising the use of all marginal land along railway lines will be explored. Solutions to meet the areas for food production could be met in a number of forms, including:</p> <ul style="list-style-type: none"> • Allotments for rent by local people. Plots should be grouped together and should be enclosed using appropriate fencing and hedging; facilities should be in secure, accessible locations with good road access and parking facilities with power and water available. Two or three strategically located allotment sites will be deemed appropriate; and • Community gardens, managed and maintained on behalf of the community, with community participation. 		
M12	Figure 11 (Access and Movement), (page 71)	Show potential cycle / footpath connections beyond site boundaries to Westerfield Rail Station.	The additional inputs to Figure 11 would not change the previous SA assessment as they only provide further information on the location of cycle and footpath connections.	No further SA assessment required.
M13	Para 4.49 (page 73)	In response to comments raised on drainage and in consultation with IBC Drainage Engineer, insert the following at end of paragraph “The Preliminary SuDS Strategy can be viewed at Appendix 5” and remove “insert link to IBC SuDS Strategy when available”.	The amended text provides clarification of the location of the Preliminary SuDS Strategy in the document and would not change the previous SA assessment.	No further SA assessment required.
M14	Para 4.50 (page 73)	In response to comments raised on drainage and in consultation with IBC Drainage Engineer, insert the following at the end of the second sentence “..., including the drainage route option	The additional text would not change the previous SA assessment as it	No further SA assessment

Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
		<p>chosen to underpin a drainage strategy and the capacity of the SuDS provided in the residential streets”.</p> <p>Current draft of paragraph 4.50</p> <p>Figure 12 shows only the strategic SuDS, which have been allocated to the most likely locations based on topography and engineering judgement. The final location and sizes will depend on more detailed analysis and design. Importantly open space will be required along all the main valley bottoms.</p> <p>Revised paragraph 4.50</p> <p>Figure 12 shows only the strategic SuDS, which have been allocated to the most likely locations based on topography and engineering judgement. The final location and sizes will depend on more detailed analysis and design, including the drainage route option chosen to underpin a drainage strategy and the capacity of the SuDS provided in the residential streets. Importantly open space will be required along all the main valley bottoms.</p>	<p>simply adds details of what will be included in the Sustainable Drainage Strategy at the planning application stage.</p>	<p>required.</p>
M15	Para 4.52 (page 73)	<p>In response to comments raised on drainage and in consultation with IBC Drainage Engineer, insert the following line at the end of this paragraph “In particular it should be noted that detailed SuDS design may result in encroachment into areas identified for development on the Development Framework Plan, as shown on the SuDS masterplan.” So that the revised paragraph 4.52 reads as follows:</p> <p>Revised paragraph 4.52</p> <p>The preliminary strategic areas for SuDS shown on Figure 12 are overlaid on the Development Framework Plan (Figure 5) in order to highlight areas where an ongoing and iterative process of masterplanning and SuDS is likely to be required to adhere to the principles of the SuDS Strategy. It should be emphasised that the design of a viable development which incorporates an adoptable SuDS network for the site may generate revisions and refinements to the land use allocations and other drawn guidance as set out in this document. In particular it should be noted that detailed SuDS design may result in encroachment into areas identified for development on the Development Framework Plan, as shown on the SuDS masterplan.</p>	<p>The additional text would not change the previous SA assessment as it adds clarification with regard to the potential revision of land use but does not discount the role of SuDS within new development.</p>	<p>No further SA assessment required.</p>
M16	Figure 12 (page 77)	<p>In response to comments raised on drainage and in consultation with IBC Drainage Engineer, amend title to figure 12 to read “Indicative Preliminary Strategic SuDS requirement”</p>	<p>Not applicable.</p>	<p>Not applicable.</p>

Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
M17	Page 95	In consultation with IBC Drainage Engineer, additional street cross section to be added to show typical residential street cross section which includes key design principles together with SuDS zone.	The additional figure will provide more details with regard to key design principles and would not change the previous SA assessment.	No further SA assessment required.
M18	Para 5.45 (page 106)	In response to comments made, an amendment is required to clarify that any rear parking spaces are not to be included as part of garden dimensions for purposes of assessing against minimum standard sizes for gardens. Current draft of paragraph of 5.45 Dimensions for gardens do not include any rear garden spaces. Revised paragraph 5.45 For the purposes of considering proposed garden sizes against minimum policy requirements for rear garden sizes, any rear parking spaces should not be included as part of the rear garden dimensions.	Whilst the changes would be beneficial to ensure garden sizes are met, the amendment would not significantly change the previous SA assessment.	No further SA assessment required.
M19	Para 6.36 (page 130)	Clarity to be added to this paragraph that managed access to the railway bridge will be subject to consideration of the detailed transport assessments to be submitted. Current and proposed paragraphs would read: Current draft of paragraph of 6.36 Primary vehicular access points will be provided at Westerfield Road and Henley Road. Primary access points should be connected by the internal Primary Streets and the proposed new railway bridge in order to enhance the strategic road network within north Ipswich. The new railway bridge will be designed with a facility to prevent access by private cars at certain times should the need arise in the interests of good traffic management. Revised paragraph 6.36 Primary vehicular access points will be provided at Westerfield Road and Henley Road. Primary access points should be connected by the internal Primary Streets and the proposed new railway bridge in order to enhance the strategic road network within north Ipswich. The new railway bridge could be designed with a facility to prevent access by private cars at certain times should the need arise in the interests of good traffic management, this will be further investigated through future transport assessments and secured where appropriate.	The amendment would not change the previous SA assessment as the change simply clarifies that managed access will be subject to further transport assessment results.	No further SA assessment required.

Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
M20	Chapter 7 Infrastructure tables (pages 140-146)	<p>Amendments are proposed to both the strategic and neighbourhood infrastructure tables contained in chapter 7 of the SPD. There are three main changes to the infrastructure list and trigger points contained in Table 1:</p> <ul style="list-style-type: none"> • The trigger point for the completion and land transfer of initial ancillary works to include the visitor facility / community centre at the Country Park has been amended to 500 rather than 300 dwellings, which would allow for the further expansion of the neighbourhood to enable utilities and road infrastructure to connect this part of the site. • The provision of a serviced health centre site rather than securing a reserved site for this use is now required within the District Centre. This follows the consultation response from the local agents of the NHS when read alongside government guidance contained within the NPPG, which clearly establishes the link between the provision of new health infrastructure and development. It is intended that a site of approximately 0.2ha is required with phased contributions to fund delivery. • The trigger point for the transfer of a serviced site for the secondary school is removed and replaced with a requirement for arrangements to secure construction of a secondary school being in place prior to development commencing in order to meet an agreed timetable of delivery. 	The amendments would not change the previous SA assessment as the changes only add clarity to what would be required with regard to strategic and neighbourhood infrastructure.	No further SA assessment required.
M21	Para 7.4 (page 134)	<p>At present this paragraph rules out the application of a Community Infrastructure Levy (CIL) or similar to fund infrastructure in the area. Work on infrastructure provision and the method by which funding responsibility is distributed between landowners is ongoing and would form part of the site-wide Infrastructure Delivery Plan to be submitted with the planning applications. It maybe that a CIL rate or similar is determined more appropriate than securing individual contributions through S106 in the event that satisfactory agreement cannot be reached between landowners. On that basis it is considered prudent for para 7.4 (page 134) to be amended to allow for this option in the future.</p> <p>Current draft of paragraph 7.4</p> <p>The Council has commenced work on Community Infrastructure Levy (CIL) rates, which will introduce charges on new developments to fund infrastructure projects across the Borough.</p>	The amended text does not change the SA assessment as it simply provided more clarity on the methods of funding to ensure infrastructure is delivered at appropriate level.	No further SA assessment required.

Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
		<p>However, it is considered that the best option for securing infrastructure for the Garden Suburb site would be through planning conditions and a site-specific Section 106 Agreement with the landowners to ensure that their commitment of either direct delivery of or financial sums towards infrastructure that relates directly to the development site. On strategic sites such as the Ipswich Garden Suburb, an exemption from CIL rates will likely be included within the Council's Charging Schedule.</p> <p>Revised paragraph 7.4</p> <p>The Council has commenced work on setting its Community Infrastructure Levy (CIL) rates, which will introduce charges on new developments to fund infrastructure projects across the Borough. However, at this stage it is considered that the best option for securing infrastructure for the Garden Suburb site would be through planning conditions and a site-specific Section 106 Agreement with the landowners to ensure that their commitment of either direct delivery of or financial sums towards infrastructure relates directly to the development site. On strategic sites such as the Ipswich Garden Suburb, an exemption from CIL rates can be included within the Council's Charging Schedule. Notwithstanding the above, the Council will continually review whether CIL should be levied on part of or the entire site where it feels that the forthcoming changes to the pooling of Section 106 contributions may adversely impact upon infrastructure delivery, which could arise where multiple full/outline applications are submitted.</p>		
M22	Para 7.21 (page 138)	<p>Additional wording required to clarify purpose of table 1. Additional wording is added at end of Strategic Infrastructure paragraph to read ..."alongside contributions towards off-site infrastructure improvements that are considered strategic in nature."</p> <p>Current draft of paragraph 7.21</p> <p>For this reason, the infrastructure required for the garden suburb development and set out below has been divided into two categories:</p> <ul style="list-style-type: none"> • Strategic infrastructure that may be located in a single neighbourhood but is required to mitigate the cumulative impact of and serve the whole of the Garden Suburb development (and in some cases the wider community), and therefore is likely to require a comprehensive approach from all landowners to secure its delivery. These are listed in Table 1 below. <p>Revised paragraph 7.21</p> <p>For this reason, the infrastructure required for the garden suburb development and set out</p>	The additional wording does not change the previous SA assessment as it simply clarifies the purposes of Table 1.	No further SA assessment required.

Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
		<p>below has been divided into two categories:</p> <ul style="list-style-type: none"> • Strategic infrastructure that may be located in a single neighbourhood but is required to mitigate the cumulative impact of and serve the whole of the Garden Suburb development (and in some cases the wider community), and therefore is likely to require a comprehensive approach from all landowners to secure its delivery. These are listed in Table 1 below alongside contributions towards off-site infrastructure improvements that are considered strategic in nature. 		
M23	Para 7.5 (page 139)	<p>Amendment to wording to third bullet point of paragraph 7.25 to replace ...”in the interest of securing a sustainable development pattern” with “and consideration of what is necessary at various stages of the development in order to deliver a sustainable form of development”.</p> <p>Current draft of paragraph 7.25, third bullet point</p> <ul style="list-style-type: none"> • the desire to create cohesive neighbourhoods in the interest of securing a sustainable development pattern; <p>Revised paragraph 7.25, third bullet point</p> <ul style="list-style-type: none"> • the desire to create cohesive neighbourhoods in the interest of securing a sustainable development pattern and consideration of what is necessary at various stages of the development in order to deliver a sustainable form of development; 	The additional wording does not change the previous SA assessment as it simply clarifies that triggers have been considered in light of what infrastructure is needed at different stages of development.	No further SA assessment required.
M24	Page 150	<p>Additional paragraph to state that as part of this work the Council will seek to secure the inclusion of strategies to provide training, employment and business opportunities for local people and businesses.</p> <p>New paragraph 8.4</p> <p>As part of the Community Development Strategy, the Council will seek to include strategies to provide training, employment and business opportunities for local people and businesses.</p>	The new paragraph does not change the previous SA assessment as it simply strengthens the role of the Council with some benefits for SA objectives <i>ER1 To reduce poverty and social exclusion, ER2 To offer everybody the opportunity for rewarding and satisfying employment and CL1 To maintain and improve access to education and skills for both young people and adults.</i>	No further SA assessment required.
M25	Para 9.5 (page 152)	In response to comments from Councillor Jones, an additional sentence to be added to the end	The additional sentence does not	No further SA

Modification reference	Which Page/Paragraph does it relate to?	Modification	SA implications	Further SA required?
		of paragraph 9.5 is proposed to clarify that: “Notwithstanding this, the adoption and management of the open spaces by Ipswich Borough Council has not been precluded as an option for ensuring the appropriate future management and maintenance of the public open spaces within the Ipswich Garden Suburb”.	change the previous SA assessment as it simply provides more flexible approach to the management and maintenance of open space within the Ipswich Garden Suburb.	assessment required.

3 Further Recommendations

3.1.1 During the public consultation, representations were received from statutory bodies as well as the public. The following recommendations are suggested as a result of representations received during the Consultation stage of the SPD:

- Drainage and transport assessments should be undertaken at the detailed planning stage which gives consideration of cumulative effects of surrounding development.
- Suffolk Biological Records Centre should be included as a source of information at the planning application stage and data regarding habitats and species should be obtained to inform the baseline data and the ecology impact assessment.
- The SA has identified potential negative effects on air quality as a result of the development but also identified sustainable travel measures that may help to mitigate this. It is encouraged that more detailed assessment of traffic is undertaken at the planning application stage prior to approval which would require a detailed assessment of air quality impacts in line with government guidance. These assessments will be underpinned by the statutory requirements with regard to human health. Health Impact Assessment will be undertaken alongside any EIA to identify the need for any health facilities.
- ER5b indicator *Commercial/Retail rental data* to be replaced by *Percentage of completed retail, office and leisure development in the Ipswich Garden Suburb*.
- The development sequencing of the Ipswich Garden Suburb must be reviewed once the housing needs and target figures have been reassessed using recent data.
- Phasing of school provision and ensuring delivery to be considered during the planning application stage.

4 Next Steps

- 4.1.1 The draft SPD is being recommended for approval as interim guidance prior to full adoption, in order for the SPD to have greater weight as a material consideration in the determination of any planning applications. Full adoption of the SPD is anticipated in late 2015 following adoption of the Core Strategy and Policies development plan document focused review. The first planning application for the majority of Fonnereau site is expected to be submitted this year.