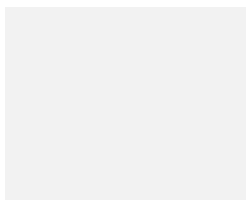


# **Ipswich Local Plan Review 2018 – 2036 Sustainability Appraisal**

Post Adoption Statement

FEBRUARY 2022

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# Ipswich Local Plan Review 2018 – 2036 Sustainability Appraisal

## Post Adoption Statement

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## Version Control

Version	Date	Author	Checker	Reviewer	Approver	Changes
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This report dated 25 February 2022 has been prepared for Ipswich Borough Council (the “Client”) in accordance with the terms and conditions of appointment dated 21 April 2021 (the “Appointment”) between the Client and Arcadis (UK) Limited (“Arcadis”) for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

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# 1 Introduction

## 1.1 What is the Ipswich Local Plan Review 2018 - 2036?

- 1.1.1 In February 2017, Ipswich Borough Council (the Council) adopted the Local Plan 2011 – 2031. The Council prepared a review of the Local Plan, which replaced the Adopted Plan, and covers the period 2018 to 2036. Arcadis Consulting (UK) Ltd ('Arcadis') was commissioned by Ipswich Borough Council ('the Council') to prepare a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the emerging Ipswich Local Plan Review (LPR).
- 1.1.2 The Ipswich Local Plan Review is presented in two documents:
- Core Strategy and Policies Development Plan Document (DPD); and
  - Site Allocations and Policies (incorporating IP-One AAP) DPD.
- 1.1.3 The Core Strategy document presents the Council's preferred approach for a Vision and Objectives for the Borough by 2036. It also sets out policies related to the Council's Strategy for the Borough. The Site Allocations and Policies document presents a range of site-based policies, most of which allocate sites in the Borough for certain types and scales of development, designed to help ensure that the Borough's development needs up to 2036 can be met.
- 1.1.4 The Council has aligned its Local Plan with the Local Plans for Babergh District, Mid-Suffolk District and Suffolk Coastal District (now part of East Suffolk Council) Councils – the other authorities that form the Ipswich Housing Market Area (IHMA) and Ipswich Functional Economic Area (FEA). These authorities work collectively to achieve the housing and employment land required, as identified through the IHMA and the FEA through what is known as the Ipswich Strategic Planning Area (ISPA).

## 1.2 What is the Sustainability Appraisal and Strategic Environmental Assessment?

- 1.2.1 Sustainability Appraisal (SA) is the process of identifying the social, economic and environmental effects of a plan to ensure that sustainable development is at the heart of the plan-making process. It applies a holistic assessment of the likely effects of the plan on social, economic and environmental objectives. Section 19 of the Planning and Compulsory Purchase Act 2004<sup>1</sup> requires a local planning authority (LPA) to carry out SA of a plan. The Town and Country Planning (Local Planning) (England) Regulations 2012<sup>2</sup> dictate that, after adopting a plan, the LPA must make the SA Report available.
- 1.2.2 Strategic Environmental Assessment (SEA) is a legal requirement set out in The Environmental Assessment of Plans and Programmes Regulations 2004<sup>3</sup> (the SEA Regulations).
- 1.2.3 National Planning Policy Guidance (NPPG)<sup>4</sup> states that SA should incorporate the requirements of SEA into one coherent process. This SA Report satisfies the requirements of an SEA Environmental

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<sup>1</sup> Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Accessed: 08/12/21]

<sup>2</sup> Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Accessed: 08/12/21]

<sup>3</sup> Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Accessed: 08/12/21]

<sup>4</sup> Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Accessed: 08/12/21]

Report. The SA has been applied as an iterative process during the preparation of the Plan to help contribute towards the objective of achieving sustainable development.

## **1.3 SA and Local Plan process so far**

1.3.1 Table 1-1 below sets out the SA process to date, commencing in August 2017 with the preparation of the SA Scoping Report by the Council and ending in 2022 with the adoption of the LPR.

## **1.4 Purpose of the Post Adoption Statement**

1.4.1 This Post Adoption Statement represents the conclusion of the SA process and fulfils the plan and programme adoption requirements of the SEA Regulations. In accordance with Regulation 16 (4) of the SEA Regulations, this statement sets out the following:

- How environmental considerations have been integrated into the plan or programme (Chapter 2 of this document);
- How the environmental report has been taken into account (Chapter 2 of this document);
- How opinions expressed in response to the consultation on the SA Reports have been taken into account (Chapter 3 of this document);
- How the results of any consultations have been taken into account (Chapter 3 of this document);
- The reasons for choosing plan or programme as adopted, in the light of the other reasonable alternatives dealt with (Chapter 4 of this document); and
- The measures that could be taken to monitor the significant environmental effects of the implementation of the plan or programme (Chapter 5 of this document).

Table 1-1: The SA process so far

Plan Stage	Sustainability Appraisal & Strategic Environmental Assessment Stage and requirements	Completed?
Evidence Gathering and Issues and Options	Identify related plans/programmes	<i>Scoping Report<sup>5</sup> consulted on between 18th August and 30th October 2017</i>
	Identify environmental protection objectives	
	Baseline data and likely future trends	
	Identify sustainability issues and opportunities	
	Develop objectives, indicators and targets (SA Framework)	
	Prepare SA Scoping Report	
	Consult on the SA Scoping Report	
	Review scoping consultation responses and preparation of Final Scoping Report to inform next stage.	
Draft Plan Regulation 18	Assess Plan Vision and Objectives against the SA Framework	<i>Completed in January 2019<sup>6</sup> and consulted on between 16 January and 13 March 2019</i>
	Assess growth and spatial options and their reasonable alternatives against the SA Framework	
	Assess preferred policy options, including allocations and their reasonable alternatives	
	Propose mitigation measures	
	Propose monitoring programme	
	Prepare Non-Technical Summary (NTS)	
	Prepare Interim SA Report	
	Consult on the Interim SA Report	
	Identify changes to Plan since previous stage	

<sup>5</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/sustainability\\_appraisal\\_scoping\\_report\\_final\\_-\\_aug17\\_v2.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/sustainability_appraisal_scoping_report_final_-_aug17_v2.pdf) [Accessed: 08/12/21]

<sup>6</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/sa\\_and\\_sea\\_including\\_non\\_technical\\_summary.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/sa_and_sea_including_non_technical_summary.pdf) [Accessed: 08/12/21]

Plan Stage	Sustainability Appraisal & Strategic Environmental Assessment Stage and requirements	Completed?
Final Draft Local Plan Regulation 19	Determine relevance of changes to the Plan for the SA/SEA, including assessments of new or revised policies with cumulative and synergistic effects assessment updated accordingly	<i>Completed in October 2019<sup>7</sup> and on between 15th January and 2nd March 2020</i>
	Update all other elements to the SA Report in light of the changes to the Plan	
	Ensure the SA Report is compliant with the SEA Directive in terms of requirements for an Environmental Report	
	Consult on the Final Draft SA Report	
Submission to SoS for consideration	Identify changes to Plan since previous stage	<i>Submitted to the SoS 10th June 2020. SA Addendum prepared in June 2020<sup>8</sup> Examination Hearings held between November and December 2021<sup>9</sup></i>
	Determine relevance of changes to the Plan for the SA/SEA, including assessments of new or revised policies with cumulative and synergistic effects assessment updated accordingly	
	Update all other elements to the SA Report in light of the changes to the Plan	
	Ensure the SA Report is compliant with the SEA Directive in terms of requirements for an Environmental Report	
Examination	Determine the relevance of any Modifications made to the PLAN as an outcome of Examination.	<i>Completed in July 2021<sup>10</sup> and consulted between 29th July and 23rd September 2021</i>
	Assess Main Modifications for their likely effects on SA Framework	
	Prepare addendum to the SA Report addressing the Main Modifications and any new significant effects on the Framework	
Adoption	E. Adoption Statement	<b>We are here</b>

<sup>7</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4\\_-\\_ilp\\_arcadis\\_sa\\_report\\_inc\\_non-technical\\_summary\\_regs\\_19\\_stageappendices\\_a-eoct\\_2019.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4_-_ilp_arcadis_sa_report_inc_non-technical_summary_regs_19_stageappendices_a-eoct_2019.pdf) [Accessed: 08/12/21]

<sup>8</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a5\\_-\\_ipswich\\_local\\_plan\\_2018-36\\_sustainability\\_appraisal\\_addendum\\_air\\_qual\\_flood\\_risk.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a5_-_ipswich_local_plan_2018-36_sustainability_appraisal_addendum_air_qual_flood_risk.pdf) [Accessed: 08/12/21]

<sup>9</sup> Available at: <https://www.ipswich.gov.uk/content/examination-overview> [Accessed: 08/12/21]

<sup>10</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich\\_sa\\_of\\_the\\_main\\_mods\\_26.07-compressed.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_sa_of_the_main_mods_26.07-compressed.pdf) [Accessed: 08/12/21]



## 2 How environmental considerations have been integrated into the Local Plan

### 2.1 Overview

- 2.1.1 The purpose of the SA is to integrate sustainability considerations into the plan and help it to achieve its key objectives. This is accomplished using a collaborative and iterative relationship between those carrying out the SA and the plan-makers, based on a phased approach at key stages throughout its development.
- 2.1.2 National Planning Practice Guidance (NPPG)<sup>11</sup> specifies the five stages of the SA Process as follows:
- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope (Scoping)
  - Stage B: Developing and refining alternatives and assessing effects
  - Stage C: Prepare the SA Report
  - Stage D: Seek representations on the SA Report from consultation bodies and the public (Consultation)
  - Stage E: Post adoption reporting and monitoring
- 2.1.3 The SA of the LPR was undertaken in accordance with this guidance. The following subsections set out how the SA has influenced the LPR at each of these key stages.

### 2.2 Scoping

- 2.2.1 Scoping represents the initial stage in the SA process for the emerging Plan and sets the scope for the remainder of the process. The output of this stage was a Scoping Report that formed the basis for consultation with statutory bodies on the proposed scope of the SA.
- 2.2.2 Stage A: Scoping commenced in August 2017 with an SA Scoping Report prepared by the Council in conjunction with officers from East Suffolk which set out the scope and level of detail of the SA. The Scoping Report was updated in February 2018, in response to comments from the general public and statutory consultees received during the ten-week public consultation period. The Scoping Report:
- Reviewed other relevant programmes, plans and strategies that have an influence on sustainability to establish the policy context of the Plan and the SA;
  - Detailed the characteristics of the current environmental baseline in Ipswich;
  - Identified key sustainability issues in the Borough; and
  - Set out a Sustainability Appraisal Framework for assessing policies and policy options and the overall predicted effects of the plan.
- 2.2.3 A comprehensive review of other plans and programmes at a national, regional, county and local level was undertaken. The contents, objectives and relationships of these plans and programmes to the Plan was also reviewed to ensure these are taken into account during the SA Process. An example of a relevant plan/programme includes the National Planning Policy Framework. The full list of the

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<sup>11</sup> Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Accessed: 08/12/21]

identified plans and programmes, and their relevance to SA, is provided in Appendix A of the February 2018 SA Scoping Report<sup>12</sup>.

- 2.2.4 Among the important decisions considered during the Scoping Stage were the baseline data, quantity of data, and how should it be used in order to carry out SA. Data related to the existing economic, social and environmental characteristics of Ipswich was compiled within the Scoping Report, in order to provide the evidence base from which sustainability issues and opportunities could be identified.
- 2.2.5 The key sustainability issues and opportunities identified related to the themes of: Population, Housing, Health and Wellbeing, Education, Water, Air, Material Assets, Climatic Change, Flooding, Coasts and Estuaries, Biodiversity, Cultural Heritage, Landscape, Economy, Transport & Connectivity and Digital Infrastructure. The baseline data and key sustainability issues are presented in the SA Scoping Report.
- 2.2.6 The SA Framework (Table 2-1) comprises 19 SA Objectives that have been derived from the policy context, baseline data and key sustainability issues and opportunities. Each proposal in the Plan is assessed for its likely effects on each SA Objective, which is largely achieved by using the Guide Questions listed in the SA Framework for each SA Objective. The SA Framework originally prepared in the 2018 SA Scoping report included a column of indicators for each SA Objective. Since February 2018, these indicators have generally become out of date and less relevant to the assessment process. They have also, for their intent and purpose, been replaced by the indicators in the SA Monitoring Framework presented in Section 6. To avoid confusion this column of indicators has therefore been removed from the version of the SA Framework presented in Table 2-1. The original indicators can be seen in the February 2018 SA Scoping Report.

Table 2-1: SA Framework

SA Objective	Guide question	SEA Topics
<b>Population</b>		
1 - To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	Human health, Population
	Will it reduce benefit dependency?	
	Does it support the changing population profile of the area?	
	Will it encourage engagement/participation in community/cultural activities?	
	Will it contribute to regeneration activities?	
<b>Housing</b>		
2 - To meet the housing requirements of the whole community	Will it contribute to the supply of housing?	Human health, Population, Material assets
	Will it reduce homelessness?	
	Will it contribute to meeting demand for a range and mix of housing including affordable housing and specialist housing?	
	Will it reduce the number of unfit homes?	
	Will it contribute to the delivery of sustainable homes?	
<b>Health and wellbeing</b>		
3 - To improve the health of the population overall and reduce health inequalities	Will it improve access to health facilities and social care services?	Water, Climate factors, Human health, Fauna, Biodiversity, Flora
	Will it encourage healthy lifestyles?	
	Will it support the diverse range of health needs within the community?	
	Will it contribute to a healthy living environment? (noise, odour etc?)	
4 - To improve the quality of	Will it reduce crime/ fear of crime and anti-social activity?	
	Will it promote design that discourages crime?	

<sup>12</sup> Available at: <https://ipswich.oc2.uk/document/26/40919> [Accessed: 23/02/22]

SA Objective	Guide question	SEA Topics
where people live and work	<p>Will it avoid locating development in locations that could adversely affect people's health?</p> <p>Will it support those with disabilities?</p> <p>Will it protect and improve air quality?</p> <p>Will it avoid exacerbating existing air quality issues in designated AQMAs?</p>	
<b>Education</b>		
5 - To improve levels of education and skills in the population overall	<p>Will it improve qualifications and skills of young people and adults?</p> <p>Will it support the provision of an adequate range of educational and childcare facilities?</p>	Population, Human health
<b>Water</b>		
6 - To conserve and enhance water quality and resources	<p>Will it support the achievement of Water Framework Directive Targets?</p> <p>Will it protect and improve the quality of inland waters?</p> <p>Will it protect and improve the quality of coastal waters?</p> <p>Will it promote sustainable use of water?</p> <p>Will it maintain water availability of water dependent habitats?</p> <p>Will it support the provision of sufficient water supply and treatment infrastructure in a timely manner to support new development?</p> <p>Will it improve ground water quality?</p>	Soil, Material Assets, Landscape, Flora
<b>Air</b>		
7 - To maintain and where possible improve air quality	<p>Will it protect and improve air quality?</p> <p>Will it avoid exacerbating existing air quality issues in designated AQMAs?</p> <p>Will it contribute to a healthy living environment?</p>	Air, Human health, Fauna
<b>Material Assets (including Soil)</b>		
8 - To conserve and enhance soil and mineral resources	<p>Will it encourage the efficient use of land?</p> <p>Will it minimise the loss of open countryside to development?</p> <p>Will it minimise loss of the best and most versatile agricultural land to development?</p> <p>Will it maintain and enhance soil quality?</p> <p>Will it promote sustainable use of minerals?</p>	Human health, Landscape
9 - To promote the sustainable management of waste	<p>Will it encourage the use of previously developed land and/or the reuse of existing buildings?</p> <p>Will it prevent land contamination and facilitate remediation of contaminated sites?</p> <p>Will it reduce household waste generated/ head of population?</p> <p>Will it reduce commercial and industrial waste generated/ head of population?</p> <p>Will it increase rate/head of population of waste reuse and recycling?</p>	
<b>Climatic Change and Flooding</b>		
10 - To reduce emissions of greenhouse gases from energy consumption	<p>Will it ensure suitable adaptation to climate change?</p> <p>Will it reduce emission of greenhouse gases/head of population by reducing energy consumption?</p> <p>Will it increase the proportion of energy needs being met by renewable sources?</p>	Biodiversity, Flora, Fauna, Cultural heritage including architectural & archaeological heritage, Landscape
11 - To reduce vulnerability to climatic events and flooding	<p>Will it minimise the risk of flooding from rivers and watercourses?</p> <p>Will it minimise the risk of flooding on the coasts/estuaries?</p> <p>Will it reduce the risk of coastal/ estuarine erosion?</p> <p>Will it reduce the risk of damage from extreme weather events?</p>	
<b>The Coast and Estuaries</b>		

SA Objective	Guide question	SEA Topics
12 - To safeguard the integrity of the coast and estuaries	<p>Will it support sustainable tourism?</p> <p>Will protect environmentally designated sites?</p> <p>Will it protect the special character and setting of the coast and estuaries?</p>	Biodiversity, Flora, Fauna, Landscape, Water
<b>Biodiversity</b>		
13 - To conserve and enhance biodiversity and geodiversity	<p>Will it maintain and enhance European designated nature conservation sites?</p> <p>Will it maintain and enhance nationally designated nature conservation sites?</p> <p>Will it maintain and enhance locally designated nature conservation sites?</p> <p>Will it avoid disturbance or damage to protected species and their habitats?</p> <p>Will it help deliver the targets and actions in the Biodiversity Action Plan?</p> <p>Will it help to reverse the national decline in at risk species?</p> <p>Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?</p> <p>Will it lead to the creation of new habitat?</p> <p>Does it ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?</p>	Cultural heritage, Landscape, Biodiversity, Flora, Fauna, Water
<b>Cultural Heritage</b>		
14 - To conserve and where appropriate enhance areas and assets of historical and archaeological importance	<p>Will it protect and enhance buildings, monuments, sites, places, areas and landscapes of heritage interest or cultural value (including their setting) meriting consideration in planning decisions?</p> <p>Will it protect and enhance sites, features and areas or archaeological value in both urban and rural areas?</p> <p>Will it enhance accessibility to and the enjoyments of cultural heritage assets?</p> <p>Will it promote high quality design in context with its urban and rural landscape?</p>	Cultural heritage
<b>Landscape</b>		
15 - To conserve and enhance the quality and local distinctiveness of landscapes and townscape	<p>Will it conserve and enhance the AONB?</p> <p>Will it reduce the amount of derelict, degraded and underused land?</p> <p>Will it protect and enhance the settlement and its setting within the landscape?</p> <p>Will it protect and enhance landscape character and townscapes?</p> <p>Will it promote high quality design in context with its urban and rural landscape?</p>	Air, Material assets, Water, Cultural heritage, Population, Biodiversity, Climate factors
<b>Economy</b>		
16 - To achieve sustainable levels of prosperity and growth throughout the plan area	<p>Will it improve business development and enhance competitiveness?</p> <p>Will it improve the resilience of business and the economy?</p> <p>Will it promote growth in key sectors?</p> <p>Will it improve economic performance in disadvantaged areas?</p> <p>Will it encourage rural diversification?</p> <p>Will it encourage indigenous business?</p>	Population, Human health, Material assets
17 - To maintain and enhance the vitality and viability of town and retail centres	<p>Will it encourage inward investment?</p> <p>Will it make land available for business development?</p> <p>Will it increase the range of employment opportunities, shops and services available in town centres?</p> <p>Will it decrease the number of vacant units in town centres?</p> <p>Will it enhance the local distinctiveness within the centre?</p>	
<b>Transport, Travel and Access</b>		
18 - To encourage efficient patterns of movement, promote	<p>Will it reduce commuting?</p> <p>Will it improve accessibility to work by public transport, walking and cycling?</p> <p>Would it promote the use of sustainable travel modes and reduce dependence on the private car?</p>	Material assets, Climate factors, Landscape, Population

SA Objective	Guide question	SEA Topics
sustainable travel of transport and ensure good access to services	<p>Will it increase the proportion of freight transported by rail or other sustainable modes?</p> <p>Will it maintain and improve access to key services and facilities for all sectors of the population?</p> <p>Will it increase access to the open countryside?</p> <p>Will it increase access to public open space?</p> <p>Will it improve access to cultural facilities?</p> <p>Will it improve access to community facilities?</p> <p>Will it reduce journey times?</p> <p>Will it help to enhance the connectivity of more remote, rural settlements?</p> <p>Will it avoid effects on the quality and extent of existing recreational assets, such as formal or informal footpaths?</p>	

#### Digital Infrastructure

19 - To ensure that the digital infrastructure available meets the needs of current and future generations

Will it improve digital infrastructure provision?  
Will it increase opportunities to improve the digital economy?

Population, Material assets

2.2.7 The Scoping Report was consulted on between 18<sup>th</sup> August and 30<sup>th</sup> October 2017 with, as a minimum, the three statutory consultees of Natural England, the Environment Agency and Historic England. The Scoping Report was finalised for February 2018 in light of responses received during the consultation window. The consultation is discussed further in Chapter 3.

## 2.3 Developing and refining alternatives and assessing effects and preparing SA Report

### Overview

2.3.1 Stage B is the primary assessment stage of the SA process. There was interaction between the plan-making and SA teams during Stage B with SA being undertaken at the Draft Local Plan stage and again at Publication stage. This enabled potential adverse effects of the Local Plan to be avoided/minimised and potential sustainability benefits maximised. Assessment results and recommendations were fed back to the plan-making team on an iterative basis. The key elements of the Local Plan that were assessed through the SA process are outlined in the following subsections.

### Vision and Objectives

2.3.2 An Interim SA Report was prepared in January 2019. As part of this report, the Vision and Strategic Objectives were assessed for their compatibility with the SA Framework. Compatibility was determined by assessing the extent to which the Strategic Objective accords with the SA Objective. Each SA Objective has clearly defined guide questions. The compatibility check identified whether the strategic objectives in the LPR would be likely to make a positive contribution towards achieving the

SA Objective or, if by adopting that strategic objective, it may make it more difficult to achieve the SA Objective.

- 2.3.3 On the whole, the Council's Vision and Strategic Objectives proposed for the LPR were found to be highly compatible with the SA Framework and would be expected to help ensure the LPR delivers socially, economically and environmentally sustainable land-uses and development until 2036.

## Growth Scenarios

- 2.3.4 In 2017, the Council consulted on the Issues and Options documents. The Interim SA Report<sup>13</sup> (January 2019) assessed options for the quantity of residential and economic growth in accordance with the associated evidence base. Since the Preferred Options consultation, it was identified that the job calculations from the latest EEFM (August 2017) have forecast a significant reduction in the jobs growth in the Borough when compared to the originally used 2016 EEFM calculations. After identifying the minimum housing and employment needs for the Borough, the Council explored an additional four options of various levels of growth that meet or exceed the minimum needs which were assessed in the Final Draft SA Report<sup>14</sup>. Sections 3.6 and 3.7 of the Final Draft SA Report describe the process of developing the strategic growth options and their sustainability performance.
- 2.3.5 The appraisal identified a range of potential positive and adverse effects, with often mixed results identified against most SA Objectives. All options would be expected to help ensure that housing and employment needs in Ipswich to 2036 can be met, and this would make a significant contribution towards transforming the Borough and combating rates of homelessness, unemployment, deprivation, inequality and poverty. These effects are generally related to the fact that Ipswich is a highly constrained and urban Borough that can only support a limited amount of new development. The Old OAN and Alternative Scenarios A, D, E, F and G would lead to nearly all new development occurring within the Borough, whereas under Alternative Scenarios B and C the quantity of development being considered would be likely to necessitate a significant quantity of development outside of the Borough in neighbouring authorities, most likely on greenfield sites.
- 2.3.6 Generally speaking, it was considered that the lower the quantity of development being considered, the more feasible it would be to avoid adverse effects on environmental objectives such as biodiversity, cultural heritage and landscape. This is because fewer sites would be required for development and there would, therefore, be less scope for direct harm to sensitive assets as well as more limited cumulative and synergistic effects on the ecological network or the local landscape character, for example. As such, the Old OAN and Alternative Scenarios A, D, E, F and G could potentially result in less adverse effects on biodiversity and landscape than Alternative Scenarios B and C.

## Spatial options

- 2.3.7 The Interim SA Report also assessed options for spatial distribution. Given the tightly drawn boundary around the Borough, the range of spatial options available to the Council was limited. The options included:
- **Spatial Option 1:** Higher-density urban regeneration;
  - **Spatial Option 2:** Increased development beyond the Borough boundary;

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<sup>13</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/sa\\_and\\_sea\\_including\\_non\\_technical\\_summary.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/sa_and_sea_including_non_technical_summary.pdf) [Accessed: 08/12/21]

<sup>14</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4\\_-\\_ilp\\_arcadis\\_sa\\_report\\_inc\\_non-technical\\_summary\\_regs\\_19\\_stageappendices\\_a-eoct\\_2019.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4_-_ilp_arcadis_sa_report_inc_non-technical_summary_regs_19_stageappendices_a-eoct_2019.pdf) [Accessed: 08/12/21]

- **Spatial Option 3:** Changing the use of existing land in the Borough to housing; Options from Suffolk Coastal District Council and relate to the administrative boundary of Suffolk Coastal District only)
- **Spatial Option 4:** Continuation of existing approach (Suffolk Coastal District);
- **Spatial Option 5:** Focus on Ipswich and A14 transport corridor (Suffolk Coastal District); and
- **Spatial Option 6:** A12 transport corridor and dispersed rural focus (Suffolk Coastal District).

2.3.8 It is anticipated that certain spatial scenarios would help to facilitate different quantities of growth. The Preferred Approach and Alternative Scenario A would see nearly all new development occur in the Borough. Spatial Option 1: Higher-density urban regeneration and Spatial Option 3: Changing the use of existing land in the Borough to housing would help to deliver these growth options. Sections 3.8 and 3.9 of the Final Draft SA Report<sup>15</sup> describe the development of the strategic spatial options and the sustainability performance of these options.

## Policies

2.3.9 Draft Ipswich Strategic Planning Area policies, Core Strategy policies and Development Management policies were assessed in detail in the Interim SA Report<sup>16</sup>. Overall, the policies performed very positively and would be highly likely to help facilitate sustainable development in Ipswich. The only policies for which adverse impacts were identified were those that allocate development in the Borough.

2.3.10 Each policy was assessed for its likely effects on each SA Objective. No reasonable alternatives to the policies were identified or assessed. Although these were in effect tested as part of scenario testing at the early stages of the plan-making process. The policies were designed to conform with the Plan's strategy and objectives and an alternative approach to this i.e., policies that would not conform with the strategy and objectives, or policies that were not designed to ensure that development in Ipswich conforms with the strategy and objectives, were not reasonable. It was also considered that a 'do nothing' scenario i.e., to have no policy, was not reasonable.

2.3.11 The assessments of the proposed policies identified largely positive sustainability effects. Where adverse effects were identified, recommendations for mitigation measures were made. Where policies could potentially have a greater positive impact on an SA Objective, recommendations for improving a policy's impact or maximising its positive impact were made. Overall, the range of strategy and development management policies would be expected to help ensure that development in Ipswich over the Plan-period is environmentally, socially and economically sustainable.

2.3.12 Following on from the Interim SA Report, Policy CS9: Previously Developed Land was removed the emerging Local Plan and Policy DM20: Houses in Multiple occupation was added. The inclusion of Policy DM20 meant all DM policies were renumbered. The Final Draft SA Report appraises the final four strategic planning area policies, 20 core strategy policies and 34 development management policies that are proposed in the Publication Plan. Sections 3.10 and 3.11 of the Final Draft SA

<sup>15</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4\\_-\\_ilp\\_arcadis\\_sa\\_report\\_inc\\_non-technical\\_summary\\_regs\\_19\\_stageappendices\\_a-eoct\\_2019.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4_-_ilp_arcadis_sa_report_inc_non-technical_summary_regs_19_stageappendices_a-eoct_2019.pdf) [Accessed: 08/12/21]

<sup>16</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/sa\\_and\\_sea\\_including\\_non\\_technical\\_summary.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/sa_and_sea_including_non_technical_summary.pdf) [Accessed: 08/12/21]

Report<sup>17</sup> describes the development of the policies and the sustainability performance of the policies. The 57 policies and the SA scores are set out in Table 2-2 below.

## Sites

- 2.3.13 Within the site-based policies are a set of site allocations. Each site allocation is a delineated area of land within Ipswich, where the Council intends to support a defined quantity of a particular type of development. This is typically residential or employment development, or a mixture of the two, in order to help ensure that the Borough's development needs to 2036 can be met.
- 2.3.14 Given the limited availability of development land within Ipswich, the Council has allocated all the sites that are considered to be suitable and deliverable, in order to comply with the NPPF requirement to meet the objectively assessed housing need. During the process of assessing deliverability, the following constraints were considered, in order to filter out unsuitable sites:
- Access and Highways;
  - AQMA (within or close to);
  - Area of Archaeological Importance;
  - Conservation Areas;
  - Contaminated Land;
  - Existing Use;
  - Flood Zone 2 and 3;
  - Listed Buildings on site or nearby;
  - Recreation and Open Space;
  - Tree Preservation Order (TPO) on site or nearby;
  - Wildlife site or adjacent to; and
  - Noise
- 2.3.15 Some locations were considered to be undeliverable due to consideration of the following additional constraints on development:
- Uncertainty with regard to the deliverability of the site within the plan period;
  - Changed circumstances of existing use (when potential development is subject to relocation of existing uses on site);
  - Development of the site has been completed; and
  - Viability issues associated with amenity concerns, access and flood risk.
- 2.3.16 The Council considered that any area of land that is constrained by the above features and is therefore undeliverable, unavailable or unviable, did not qualify as a 'reasonable alternative'.
- 2.3.17 Over the course of the plan-making process, the Council has made best efforts to identify options and alternatives for new development. Following the filter process described above of discounting undeliverable sites, it was concluded that there are very limited potential alternative locations to those that have been allocated for development (i.e. all likely deliverable sites have been allocated and those that are undeliverable can be seen as 'unreasonable'). Two potential areas for future development were identified to the north of the Borough near Whitton Church Lane and Thurleston Lane. These two areas were assessed in the SA as reasonable alternatives to the proposed site allocations. Central to the Plan is a focus on regenerating Ipswich. It is unclear the extent to which

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<sup>17</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4\\_-\\_ilp\\_arcadis\\_sa\\_report\\_inc\\_non-technical\\_summary\\_regs\\_19\\_stageappendices\\_a-eoct\\_2019.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4_-_ilp_arcadis_sa_report_inc_non-technical_summary_regs_19_stageappendices_a-eoct_2019.pdf) [Accessed: 08/12/21]



these areas of land would be able to contribute towards regeneration efforts. There was also some uncertainty over the extent to which these sites are advanced and may therefore be seen as unsuitable for inclusion in this iteration of the Plan.

- 2.3.18 The Interim SA Report appraised 88 site options which were allocated within Policies SP1 – SP17. Table 7-1 of the Interim SA Report<sup>18</sup> sets out details of the 88 sites appraised. Overall, a diverse mix of likely impacts were identified.
- 2.3.19 The Final Draft SA Report appraised 121 site allocations which were set out in Policies SP2 - SP10. A full list of sites and their policies can be found in Table 3-7 of the Final Draft SA Report<sup>19</sup>.
- 2.3.20 The assessments identified largely positive sustainability effects. Overall, the range of site allocations would be expected to help ensure that development needs in Ipswich over the Plan period are satisfied with significant benefits to the Ipswich's economy and society. Effects on the natural environment would be mixed. Many sites would be likely to increase the consumption of natural resources and the subsequent generation of waste and emissions in relation to existing levels. Some sites could also pose a risk to ecological connectivity and the biodiversity value of sites, as well as the local landscape or townscape character. However, some sites could provide positive effects to these themes by enhancing the local green infrastructure cover and by incorporating high-quality sustainable design.
- 2.3.21 Sections 3.10 and 3.12 of the Final Draft SA Report<sup>20</sup> describes the development of the site allocations and their sustainability performance.

## **Air Quality and Flood Risk SA Addendum (June 2020)**

- 2.3.22 Arcadis prepared an Air Quality and Flood Risk SA Addendum in June 2020. This was prepared to consider the effects of the Air Quality Assessment and Strategic Flood Risk Assessment, which were completed in May and April 2020, after the consultation of the Final Draft SA Report had closed. The Addendum provided an update in relation to one site allocation and the subsequent cumulative effects due to predicted air quality effects at nearby receptors and the assessment of six site allocations as a result of findings of the new SFRA.
- 2.3.23 In terms of air quality, the Addendum presented an update to the assessment of site allocation IP214<sup>21</sup> against SA Objective 7 due to the AQA's predicted air quality effects at nearby receptors; and an update to the cumulative effects assessment for SA Objective 13 due to the AQA's predicted air quality effects on habitat designations.
- 2.3.24 The six sites for which the SA assessment against SA Objective 11 required a minor amendment as a result of the new SFRA were IP031b, IP043, IP064a, IP098, IP150d and the Humber Doucy Lane Cross-Border Allocation. These were not necessarily the sites at the greatest risk of flooding, but rather are the sites for which the new SFRA provided information on flood risk that was not previously reflected in the SA assessments. The assessments against SA Objective 7 for these sites replaced the assessment against SA Objective 7 for these sites presented in the Final Draft SA Report. All

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<sup>18</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/sa\\_and\\_sea\\_including\\_non\\_technical\\_summary.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/sa_and_sea_including_non_technical_summary.pdf) [Accessed: 08/12/21]

<sup>19</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4\\_-\\_ilp\\_arcadis\\_sa\\_report\\_inc\\_non-technical\\_summary\\_regs\\_19\\_stageappendices\\_a-eoct\\_2019.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4_-_ilp_arcadis_sa_report_inc_non-technical_summary_regs_19_stageappendices_a-eoct_2019.pdf) [Accessed: 08/12/21]

<sup>20</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4\\_-\\_ilp\\_arcadis\\_sa\\_report\\_inc\\_non-technical\\_summary\\_regs\\_19\\_stageappendices\\_a-eoct\\_2019.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4_-_ilp_arcadis_sa_report_inc_non-technical_summary_regs_19_stageappendices_a-eoct_2019.pdf) [Accessed: 08/12/21]

<sup>21</sup> Site IP214: 300 Old Foundry Road, not allocated in the Final LPR

other elements of the Final Draft SA Report were already consistent with the findings of the new SFRA and required no amendments.

2.3.25 The Council have responded to the recommendations set out in the SA Addendum<sup>22</sup>. These responses set out the Council's approach to the strategic green infrastructure network, minimising air pollution, the requirement for flood risk assessments and the requirement for electric vehicle charging point are to be delivered through core strategy and development management policies.

## Cumulative Effects

2.3.26 An important element of SA is the consideration of cumulative effects. This SA Report has so far presented the sustainability performance of proposals in the Final Draft Ipswich Local Plan, and their alternatives, on an individual basis. In reality, elements of the final draft local plan will not be adopted in isolation and will form one coherent plan acting in unison. For example, development management policies would be likely to help ensure that potentially negative effects of site allocations are avoided or mitigated.

2.3.27 **Cumulative effects** arise, for instance, where several proposals each have insignificant effects but together have a significant effect, or where several individual effects of the proposal have a combined effect.

2.3.28 **Synergistic effects** interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual effects.

2.3.29 Table 3-1 of the Final Draft SA<sup>23</sup> presents an assessment of the likely cumulative effects of all proposals in combination against each SA Objective. This process naturally involves a large degree of uncertainty and assumptions have to be made in each case. Best efforts have been made to provide an indication of the overall uncertainty of effects and to identify likely significant effects.

## Transboundary cumulative effects

2.3.30 Some of the development proposed in the Ipswich Plan is near the Borough's boundary, on the other side of which are, on occasion, sites being considered for development in neighbouring authorities. The following plans were factored into the cumulative effects assessment:

- Babergh and Mid Suffolk District Council – Joint Local Plan; and
- Suffolk Coastal Local Plan Review.

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<sup>22</sup> Available at: [a5.1\\_ipswich\\_borough\\_council\\_response\\_to\\_the\\_sustainability\\_appraisal\\_addendum.pdf](#) [Accessed: 17/02/22]

<sup>23</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4\\_-\\_ilp\\_arcadis\\_sa\\_report\\_inc\\_non-technical\\_summary\\_regs\\_19\\_stageappendices\\_a-eoct\\_2019.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4_-_ilp_arcadis_sa_report_inc_non-technical_summary_regs_19_stageappendices_a-eoct_2019.pdf) [Accessed: 08/12/21]

- 2.3.31 The Suffolk Coastal Local Plan Review was adopted in September 2020. The Babergh and Mid Suffolk Joint Local Plan was submitted to the Secretary of State, and Examination Hearings took place between July and September 2021.
- 2.3.32 The Babergh and Mid Suffolk Joint Local Plan (Preferred Options, Reg 19) identifies 1,757 dwellings in Babergh, 1,192 dwellings in Mid Suffolk, and therefore 2,949 dwellings in both authorities, adjacent to the northern and western perimeters of Ipswich.
- 2.3.33 The adopted Suffolk Coastal Local Plan Review identifies 2,450 dwellings to be included in the cumulative effects assessment.
- 2.3.34 The results of the cumulative effects assessment of proposals in the LPR in combination with the above listed sites in neighbouring authorities is presented in Table 3-2 of the Final Draft SA. Table 2-2 below shows the scores identified for the cumulative effects assessment.
- 2.3.35 The recommendations set out in the cumulative effects tables at the Interim SA and Final Draft SA<sup>24</sup> stages were considered by the Council. The Council prepared a document which sets out how the recommendations were taken into account. This response sets out which policies are within the Local Plan to help mitigate the potential issues highlighted within the recommendations, as well as referencing Supplementary Planning Documents and consultation with relevant stakeholders.

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<sup>24</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4.1\\_-\\_ilp\\_response\\_by\\_ibc\\_to\\_the\\_sa\\_regs\\_19\\_stage\\_jan\\_2020.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4.1_-_ilp_response_by_ibc_to_the_sa_regs_19_stage_jan_2020.pdf) [Accessed: 17/02/22]

Table 2-2: Scores recorded for each strategic growth and spatial option and for each policy (excluding those that allocate sites) as well as the scores recorded during the cumulative effects assessments

Scenario, Option, Policy	1 – Poverty & exclusion	2 - Housing	3 - Health	4 – Quality of homes and work	5 - Education	6 - Water	7 – Air quality	8 – Soils and minerals	9 - Waste	10 – GHGs & energy	11 - Flooding	12 - Coast & estuaries	13 – Biodiversity & geodiversity	14 – Cultural heritage	15 – Landscapes & townscapes	16 – Growth & prosperity	17 – Town centres	18 – Transport & movement	19 – Digital infrastructure
Growth scenarios																			
Old P. A	+	++	+	+/-	+/-	-	-	+	-	-	+/-	+	+/-	+	+/-	++	++	+	++
A	+	++	+	+/-	+/-	-	-	+	-	-	+/-	+	+	+	+/-	++	++	+	++
B	+/-	++	+/-	+/-	+/-	-	-	+/-	-	-	+/-	+/-	-	-	-	++	++	+/-	+
C	+	++	++	+	++	-	-	-	-	-	+/-	+/-	-	-	-	++	++	+/-	+
D	+	++	+	+/-	+/-	-	-	+	-	-	+/-	+	+	+	+	++	++	++	++
E	+	++	+	+/-	+/-	-	-	+	-	-	+/-	+	+/-	+	+/-	++	++	+	++
F	+	++	+	+/-	+/-	-	-	+	-	-	+/-	+	+/-	+	+/-	++	++	+	++
G	+	++	+	+/-	+/-	-	-	+	-	-	+/-	+	+/-	+	+/-	++	++	+	++
Spatial options																			
1	++	+	+	-	+	+/-	+/-	+	+	+	+/-	+	+	+/-	+	++	++	++	+
2	+/-	++	+	++	+	+/-	-	-	-	-	-	-	-	+/-	-	++	+	-	+/-
3	+/-	+	+	+/-	+	-	+/-	+/-	+/-	-	+/-	+/-	-	-	-	+	+	+/-	+/-
4	+	++	++	+	+	+/-	-	-	+/-	-	+/-	-	-	-	-	+	+	-	+/-
5	+	++	++	+	+	+/-	-	-	+/-	-	+/-	+/-	-	-	-	+	+	-	+/-
6	+	++	+	+	+	+/-	-	-	-	-	-	+	-	-	-	+	+/-	-	+/-
Ipswich Strategic Planning Area Policies																			
ISPA1	++	++	+	+	+	-	-	-	-	-	-	+/-	-	-	-	++	++	-	+
ISPA2	++	+	++	++	++	++	++	+	+	+	+	+	-	-	+	+	+	++	++
ISPA3	○	○	+	○	+	+	○	○	○	○	+/-	++	++	○	○	○	○	○	○
ISPA4	+	++	+	+	+	+	-	-	○	-	+/-	○	-	+	-	++	++	+	○
Core Strategy Policies																			
CS1	+	+	+	+	+	-	-	-	-	-	-	+	+	+	+	+	+	+	+
CS2	+	++	++	++	+	-	+	-	-	+	-	+	-	+	+	++	+	+	+
CS3	+	++	+	+	++	-	+	+	+	+	-	+	+	+	+	++	++	+	+
CS4	+	○	+	+	○	+	+	++	+	+	+	+	++	++	++	+	+	+	○
CS5	++	○	+	+	+	○	+	○	○	+	○	○	○	○	○	+	++	++	++
CS7	+	++	+	+/-	+/-	-	-	+	-	-	+/-	+	+	+	+	+	++	++	++
CS8	++	++	+	++	○	○	○	○	○	+	○	○	○	+	+	+	+	+	○
CS10	++	++	++	++	++	-	-	-	-	-	+	○	+	-	-	++	++	++	++
CS11	+	++	+	+	○	+	○	+	-	-	+	○	+	+	○	○	○	○	○
CS12	++	++	+	+	○	○	○	○	○	○	○	○	○	○	○	+	+	+	○
CS13	++	○	○	+	++	-	-	-	-	-	+	○	-	+	-	++	++	+	+
CS14	++	○	○	+	+	-	-	+	-	+	+	○	○	+	+	++	++	++	+
CS15	+	○	+	○	++	○	+	○	○	○	○	○	○	○	○	+	+	○	○
CS16	+	○	+	+	○	+	+	+	○	+	+	+	++	+	++	○	+	+	○
CS17	+	○	++	+	++	+	+	○	○	+	++	○	+	++	+	++	++	++	++
CS18	+	○	+	+	○	+	○	+	○	○	++	+/-	+	○	+/-	+	+	○	○

Scenario, Option, Policy	1 – Poverty & exclusion	2 - Housing	3 - Health	4 – Quality of homes and work	5 - Education	6 - Water	7 – Air quality	8 – Soils and minerals	9 - Waste	10 – GHGs & energy	11 - Flooding	12 - Coast & estuaries	13 – Biodiversity & geodiversity	14 – Cultural heritage	15 – Landscapes & townscapes	16 – Growth & prosperity	17 – Town centres	18 – Transport & movement	19 – Digital infrastructure
CS19	+	+	++	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
CS20	+	0	+	+	+	0	++	0	0	++	0	0	0	0	+/-	++	++	++	0
Development Management Policies																			
DM1	+	+	0	+	0	+	+	0	0	+	+	0	+	0	+	0	0	+	+
DM2	+	+	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0
DM3	0	0	+	+	0	0	++	0	0	+	0	0	0	+	+	0	+	0	0
DM4	0	+	0	+	0	++	0	0	0	0	++	+/-	+	0	0	0	0	0	0
DM5	+	0	+	+	0	0	0	+	0	0	0	0	0	0	+	0	0	0	0
DM6	+	0	+	+	0	0	0	+	0	0	0	0	0	0	+	0	0	0	0
DM7	+	+	+	++	0	+	0	+	0	0	+	0	+	0	+	0	0	0	0
DM8	+	0	+	0	0	+	+	+	0	+	+	++	++	+	+	0	0	0	0
DM9	0	0	0	0	0	0	+	+	0	+	+	0	++	+	+	0	0	0	0
DM10	+	0	+	++	0	0	+	0	0	+	+	0	+	+	+	+	+	++	0
DM11	+	0	0	0	0	0	+	+	0	+	+	+	+	+	++	+	+	+	0
DM12	+	+	+	++	0	+	+	+	+	+	+	+	+	+	++	0	0	++	0
DM13	0	0	0	0	0	0	0	0	0	0	0	0	0	++	+	0	0	0	0
DM14	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0	0
DM15	+	0	0	+	0	0	0	+	0	0	0	0	0	+	+	0	0	+	0
DM16	0	+	0	+	0	0	0	0	0	0	0	0	0	+	+	0	0	0	0
DM17	0	+	0	+	0	0	0	+	0	0	0	0	-	+	-	0	0	+	0
DM18	0	+	+	++	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0
DM19	0	+	0	+	0	0	0	+	0	0	0	0	0	+	0	0	0	0	0
DM20	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
DM21	+	0	+	+	0	0	+	0	0	++	0	0	0	0	+	+	+	++	0
DM22	0	0	+	+	0	0	+	0	0	++	0	0	0	0	0	0	0	+	0
DM23	0	+	0	+	0	0	0	+	0	+	+	0	+	-	-	0	0	+	0
DM24	+	0	+	0	+	0	0	0	0	+	0	0	0	+	0	0	0	+	0
DM25	0	0	+	++	0	0	0	0	0	0	0	0	0	0	++	+	+	+	0
DM26	0	0	+	+	0	0	0	0	0	0	0	0	+	+	++	0	+	+	0
DM27	+	0	0	+	0	0	+	0	0	0	0	0	0	+	+	++	++	+	0
DM28	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	+	++	+	0
DM29	+	0	+	+	0	+	+	+	+	0	0	0	0	0	+	++	+	+	0
DM30	+	0	+	+	0	0	0	0	0	0	0	0	0	+	+	+	++	+	0
DM31	+	0	0	0	0	0	+	0	0	0	0	0	0	0	+	+	++	+	0
DM32	+	0	+	+	0	0	+	0	0	0	0	0	0	0	+	+	+	+	0
DM33	+	0	0	+	+	0	0	0	0	0	0	0	0	0	+	++	++	0	0
DM34	+	0	0	+	0	0	+	0	0	+	0	0	0	0	0	+	+	+	++
Site Policies																			
SP1	++	++	+	+	++	-	-	-	-	-	-	+	+	+	-	++	++	++	++
SP11	+	+	+	++	+	+/-	+/-	++	+/-	+/-	-	+	+/-	++	++	++	++	+	0
SP12	+	0	0	0	+	0	0	+	0	0	0	0	0	0	0	+	0	0	0
SP13	+	+	+	++	0	0	+/-	++	+/-	+/-	0	0	0	++	++	++	++	+	0

Scenario, Option, Policy	1 – Poverty & exclusion	2 - Housing	3 - Health	4 – Quality of homes and work	5 - Education	6 - Water	7 – Air quality	8 – Soils and minerals	9 - Waste	10 – GHGs & energy	11 - Flooding	12 - Coast & estuaries	13 – Biodiversity & geodiversity	14 – Cultural heritage	15 – Landscapes & townscapes	16 – Growth & prosperity	17 – Town centres	18 – Transport & movement	19 – Digital infrastructure
SP15	+	0	+	0	0	0	+	0	0	+	0	0	0	0	0	+	+	++	0
SP16	+	0	0	0	0	0	+	0	0	+	0	0	0	0	0	+	+	+	0
SP17	+	0	0	0	0	0	-	0	0	-	0	0	0	0	0	+	+	+	0
Cumulative effects of all proposals in the Final Draft Ipswich Local Plan																			
All	++	++	+	-	++	-	-	-	-	-	-	+	-	+	-	++	++	++	++
Cumulative effects of the Plan with development in neighbouring authorities																			
All	+	++	+	-	++	-	-	-	-	-	-	0	-	0	-	++	++	+	+

## 2.4 Consultation

- 2.4.1 Consultation with statutory bodies and the public was undertaken throughout the iterative Plan development process. Chapter 3 describes how the opinions expressed during consultation were taken into account and influenced the development of the Plan throughout the process.

## 2.5 Examination and Main Modifications

- 2.5.1 The Ipswich Borough Council Local Plan 2018 – 2036 was submitted to the Secretary of State for independent examination on 10<sup>th</sup> June 2020. The Examination Hearings were held between the 24<sup>th</sup> November and 16<sup>th</sup> December 2020.
- 2.5.2 As a result of the Inspector's findings from the Examination Hearing, an Interim Findings letter was sent to the Council on 10<sup>th</sup> March 2021. This identified that the Council could proceed with the necessary Main Modifications to make the plan 'sound', and for the required update of the SA and the HRA which need approval from the Inspectors before the consultation on those proposed Main Modifications could begin and to ensure legal compliance.
- 2.5.3 The Main Modifications made to the LPR include changes/removal of policies, additional site allocations plus changes/removal to a number of existing site allocations, to be considered within the Local Plan period. An SA Addendum was prepared by Arcadis which considered whether each Main Modification would require further assessment as part of the SA process, as determined by Arcadis. If identified as being required, the SA Addendum sets out the assessment of the Main Modifications and any changes would alter the Submission SA Report findings. Overall, the Main Modifications have resulted in greater benefits, even though the overall cumulative effects have not altered.
- 2.5.4 The Council then held a consultation on Main Modifications of the Local Plan and the associated SA Addendum between the 29<sup>th</sup> July and 23<sup>rd</sup> September 2021.
- 2.5.5 The Inspector's Report dated 17<sup>th</sup> February 2022 on the LPR examination concludes that the Ipswich LPR provides an appropriate basis for the planning of the Borough, provided that a number of Main Modifications (MMs) are made to it. Following the consultation and appraisal of the previously recommended Main Modifications, a number of minor changes were further suggested by the Inspectors.
- 2.5.6 Table A-1 in Appendix A sets out these further Main Modifications. The changes between the original modifications and the further modifications are highlighted in green.
- 2.5.7 In addition to the further Main Modifications, Additional Minor Modifications have been proposed. These involve correcting typographical errors and ensuring consistency throughout the report. Table 2-3 sets out the modification to policy numbering which is proposed through these Additional Minor Modifications.

Table 2-3: Policies set out in the Main Modifications and their final titles

Main Modification Policy Title	Final Policy Title
<b>Mixed Use Sites and Allocations Outside the IP-One Area:</b>	
New Policy – Retail site allocation outside the IP-One Area	Policy SP4 – Retail site allocation outside the IP-One Area
Policy SP7 – Land allocated for leisure uses or community facilities outside the IP-One Area	Policy SP6 – Land allocated for leisure uses or community facilities outside the IP-One Area
Policy SP8 – Orwell Country Park Extension	Policy SP7 – Orwell Country Park Extension
New Policy – Sustainable travel infrastructure outside the IP-One Area	Policy SP8 – Sustainable travel infrastructure outside the IP-One Area
New Policy – Sites off Nacton Road, South Ravenswood	Policy SP9 – Sites off Nacton Road, South Ravenswood
New Policy – Felixstowe Road, IP010	Policy SP10 – Felixstowe Road, IP010
New Policy – Land Opposite 674-734 Bramford Road, IP029	Policy SP11 – Land Opposite 674-734 Bramford Road, IP029
New Policy – King George V Playing Fields, IP032	Policy SP12 – King George V Playing Fields, IP032
New Policy – Land at Bramford Road (Stocks), IP033	Policy SP13 – Land at Bramford Road (Stocks), IP033
New Policy – Former School Site, Lavenham Road, IP061	Policy SP14 – Former School Site, Lavenham Road, IP061
Policy SP11 – The Waterfront	Policy SP15 – The Waterfront
Policy SP12 – The Education Quarter	Policy SP16 – The Education Quarter
Policy SP13 – The Portman Quarter	Policy SP17 – The Portman Quarter
<b>IP-One Opportunity Areas</b>	
New Policy – Opportunity Area A Island Site and Surrounding Area	Policy SP18 – Opportunity Area A Island Site and Surrounding Area
New Policy – Opportunity Area B Merchant Quarter	Policy SP19 – Opportunity Area B Merchant Quarter
New Policy – Opportunity Area C Mint Quarter and Surrounding Area	Policy SP20 – Opportunity Area C Mint Quarter and Surrounding Area
New Policy – Opportunity Area D Education Quarter and Surrounding Area	Policy SP21 – Opportunity Area D Education Quarter and Surrounding Area
New Policy – Opportunity Area E Westgate	Policy SP22 – Opportunity Area E Westgate
New Policy – Opportunity Area F River and Princes Street Corridor	Policy SP23 – Opportunity Area F River and Princes Street Corridor
New Policy – Opportunity Area G Upper Orwell River and Canalside	Policy SP24 – Opportunity Area G Upper Orwell River and Canalside
New Policy – Opportunity Area H Holywells	Policy SP25 – Opportunity Area H Holywells
New Policy – Housing Allocations in the IP-One Area	Policy SP26 – Housing Allocations in the IP-One Area
New Policy – Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area	Policy SP27 – Land with Planning Permission or Awaiting a Section 106 Agreement in the IP-One Area
Policy SP10 – Retail Site Allocations in the IP-One Area	Policy SP28 – Retail Site Allocations in the IP-One Area
New Policy SP4 – Opportunity Sites in the IP-One Area	Policy SP29 – Opportunity Sites in the IP-One Area
New Policy – Land allocated for Employment in the IP-One Area	Policy SP30 – Land allocated for Employment in the IP-One Area
New Policy – Land allocated and protected as open space in the IP-One Area	Policy SP31 – Land allocated and protected as open space in the IP-One Area



Main Modification Policy Title	Final Policy Title
Policy SP15 – Improving pedestrian and cycle routes in IP-One Area	Policy SP32 – Improving pedestrian and cycle routes in IP-One Area
Policy SP16 – Transport Proposals in IP-One Area	Policy SP33 – Transport Proposals in IP-One Area
Policy SP17 – Town Centre Car Parking in IP-One Area	Policy SP34 – Town Centre Car Parking in IP-One Area
New Policy – Island Site, IP037	Policy SP35 – Island Site, IP037
New Policy – Mint Quarter, IP048	Policy SP36 – Mint Quarter, IP048
New Policy – Waste Tip, IP003	Policy SP37 – Waste Tip, IP003
New Policy – Bus Depot, IP004	Policy SP38 – Bus Depot, IP004
New Policy – West End Road Surface Car Park, IP015	Policy SP39 – West End Road Surface Car Park, IP015
New Policy – Key Street/Star Lane/Burtons, IP035	Policy SP40 – Key Street/Star Lane/Burtons, IP035
New Policy – Former Civic Centre, IP040	Policy SP41 – Former Civic Centre, IP040
New Policy – Land between Cliff Quay and Landseer Road, IP042	Policy SP42 – Land between Cliff Quay and Landseer Road, IP042
New Policy – Commercial Building, Star Lane, IP043	Policy SP43 – Commercial Building, Star Lane, IP043
New Policy – Land at Commercial Road, IP047	Policy SP44 – Land at Commercial Road, IP047
New Policy – Old Cattle Market, Portman Road, IP051	Policy SP45 – Old Cattle Market, Portman Road, IP051
New Policy – Land between Old Cattle Market and Star Lane, IP054b	Policy SP46 – Land between Old Cattle Market and Star Lane, IP054b
New Policy – Land east of West End Road, IP119	Policy SP47 – Land east of West End Road, IP119
New Policy – Former St Peter’s Warehouse, IP132	Policy SP48 – Former St Peter’s Warehouse, IP132
New Policy – Silo, College Street, IP136	Policy SP49 – Silo, College Street, IP136

2.5.8 All of the further modifications are minor and unsubstantial, and therefore, would not result in a change in the previously identified SA effects.

## 2.6 Monitoring

2.6.1 The SEA Regulations require that the plan is monitored to test the actual significant effects of implementing the plan against those predicted through the assessment. This process helps to ensure that any undesirable environmental effects are identified, and remedial action is implemented accordingly. Based on the assessment conducted on the options and identification of potential significant environmental effects, a monitoring framework has been prepared and is presented in Chapter 5.

## 2.7 How the findings of the SA have been taken into account

2.7.1 The SA Reports have appraised spatial, strategic, development management and site policy options throughout the plan-making process.

2.7.2 Throughout the plan-making process the Council’s decision making has been informed by the sustainability performance of options identified during the accompanying SA process. Sustainability is a fundamental goal and a consistent thread running throughout the Final Draft Ipswich Local Plan.

The SA has provided recommendations to the Council in an iterative process that are typically in the form of policy wording changes, or development management related recommendations for site allocations, designed to help avoid or minimise negative impacts and to enhance positive impacts. Many of these recommendations have been adopted by the Council and have made a provable improvement to the sustainability performance of the Ipswich LPR.

- 2.7.3 Documents have been published by the Council which sets out the Council's responses to the recommendations set out in the Final Draft SA<sup>25</sup> and the Addendum prepared in June 2020<sup>26</sup>.
- 2.7.4 These documents show how some recommendations have been incorporated into policy wording or is dealt with in other documents, such as Supplementary Planning Documents (SPDs). If the recommendations are not achievable, have set out reasonings for this. The Executive Report for the Preferred Options Local Plan states "*The Preferred Options changes have been subject to initial sustainability appraisal and Habitats Regulations Assessment and recommendations incorporated into the Local Plan Review where appropriate*".

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<sup>25</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4.1\\_-\\_ilp\\_response\\_by\\_ibc\\_to\\_the\\_sa\\_regs\\_19\\_stage\\_jan\\_2020.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a4.1_-_ilp_response_by_ibc_to_the_sa_regs_19_stage_jan_2020.pdf) [Accessed: 17/02/22]

<sup>26</sup> Available at: [a5.1\\_ipswich\\_borough\\_council\\_response\\_to\\_the\\_sustainability\\_appraisal\\_addendum.pdf](a5.1_ipswich_borough_council_response_to_the_sustainability_appraisal_addendum.pdf) [Accessed: 17/02/22]

## 3 How the opinions of the Consultation Bodies have been taken into account

### 3.1 Consultation on the Local Plan Review

The development of the Local Plan has been informed by ongoing public engagement and consultation, in accordance with the Town and Country Planning Regulations. Table 3-1 sets out the key consultations that took place during the Plan's development.

Table 3-1: Local Plan Review documents and where to find them

Local Plan Documents	Consultation held	Where to find them
Ipswich Local Plan 'Call for Sites'	June – July 2017	Available at: <a href="https://www.ipswich.gov.uk/content/ipswich-local-plan-call-sites">https://www.ipswich.gov.uk/content/ipswich-local-plan-call-sites</a>
Issues and Options for the Ipswich Borough Local Plan Review	August - October 2017	Available at: <a href="https://www.ipswich.gov.uk/content/closed-public-consultation-issues-and-options-ipswich-local-plan-review-and-sustainability">https://www.ipswich.gov.uk/content/closed-public-consultation-issues-and-options-ipswich-local-plan-review-and-sustainability</a>
Core Strategy and Policies Development Plan Document Review – Preferred Options (November 2018)	January – March 2019	Available at: <a href="https://www.ipswich.gov.uk/ipswichfuture">https://www.ipswich.gov.uk/ipswichfuture</a>
Core Strategy and Policies Development Plan Document Review - Final Draft (January 2020)	January – March 2020	Available at: <a href="https://www.ipswich.gov.uk/content/ipswich-local-plan-review-final-draft-consultation">https://www.ipswich.gov.uk/content/ipswich-local-plan-review-final-draft-consultation</a>
Schedule of Core Strategy and Policies DPD Main Modifications (July 2021) and Schedule of Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Main Modifications (July 2021)	July – September 2021	Available at: <a href="https://www.ipswich.gov.uk/mainmodifications">https://www.ipswich.gov.uk/mainmodifications</a>

### 3.2 Consultation on SA Reports

3.2.1 The ISA Reports that have been prepared, and where they can be accessed online, are set out in Table 3-2. This also includes reference to where further information on responses to each consultation are recorded and how opinions of the consultation bodies have been taken into account.

Table 3-2: SA Reports and where to find them

SA Reports	Where to find them
Sustainability Appraisal Scoping Report (August 2017)	Available at: <a href="https://www.ipswich.gov.uk/content/closed-public-consultation-issues-and-options-ipswich-local-plan-review-and-sustainability">https://www.ipswich.gov.uk/content/closed-public-consultation-issues-and-options-ipswich-local-plan-review-and-sustainability</a>
Interim Sustainability Appraisal Report (January 2019)	Available at: <a href="https://www.ipswich.gov.uk/ipswichfuture">https://www.ipswich.gov.uk/ipswichfuture</a>
Final Draft Sustainability Appraisal Report (October 2019)	Available at: <a href="https://www.ipswich.gov.uk/content/ipswich-local-plan-review-final-draft-consultation">https://www.ipswich.gov.uk/content/ipswich-local-plan-review-final-draft-consultation</a>
Sustainability Appraisal – Air Quality and Flood Risk Addendum (June 2020)	Available at: <a href="https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a5-_ipswich_local_plan_2018-36_sustainability_appraisal_addendum_air_qual_flood_risk.pdf">https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a5-_ipswich_local_plan_2018-36_sustainability_appraisal_addendum_air_qual_flood_risk.pdf</a>
Sustainability Appraisal – Main Modifications Addendum	Available at: <a href="https://www.ipswich.gov.uk/mainmodifications">https://www.ipswich.gov.uk/mainmodifications</a>

### 3.3 Consideration of Responses

- 3.3.1 The opinions expressed throughout the consultation outlined above have informed the scope of the SA, helping to in turn to shape the development of the LPR.
- 3.3.2 The Consultation Statements set out how the Council has involved the local community, stakeholders and statutory bodies in the formulation of the LPR. Three Statements have been prepared, one setting out the consultation of the Issues and Options LPR<sup>27</sup>, one for the Preferred Options LPR<sup>28</sup> and one for the Ipswich Final Draft LPR<sup>29</sup>. The Statements set out who was consulted, how they were consulted, the main issues raised in the representations and how they were taken into account.
- 3.3.3 Arcadis provided responses to SA- related representations to the Council, which were then integrated into these Consultation Statements (see pg. 303 of the Preferred Options Consultation Statement and pg. 392 of the Final Draft LPR Consultation Statement).

<sup>27</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/issues\\_and\\_options\\_stage\\_consultation\\_statement\\_nov\\_2018.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/issues_and_options_stage_consultation_statement_nov_2018.pdf) [Accessed: 21/02/22]

<sup>28</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/preferred\\_options\\_consultation\\_statement\\_reg\\_19.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/preferred_options_consultation_statement_reg_19.pdf) [Accessed: 21/02/22]

<sup>29</sup> Available at: [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a11\\_-\\_reg\\_22\\_consultation\\_statement\\_v2.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/a11_-_reg_22_consultation_statement_v2.pdf) [Accessed: 21/02/22]

## 4 The reasons for choosing the adopted Local Plan in light of reasonable alternatives considered

### 4.1 Overview

- 4.1.1 SEA Regulation 12 (2) requires that “an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated”.
- 4.1.2 Information to be provided includes “an outline of the reasons for selecting the alternatives dealt with” (SEA Regulations Schedule 2 (8)) and an overview of types of alternatives considered (development scenarios, site allocations etc.)
- 4.1.3 In ‘R (on the application of Friends of the Earth England, Wales and Northern Ireland Ltd) v Welsh Ministers [2015] Env LR 1’, Hickinbottom J found the following, with regards to reasonable alternatives:

*“iv) “Reasonable alternatives” does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.*

*v) Article 5(1) refers to “reasonable alternatives taking into account the objectives... of the plan or programme...”. “Reasonableness” in this context is informed by the objectives sought to be achieved. An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”. An option which will, or sensibly may, achieve the objectives is a “reasonable alternative”. The SEA Directive admits to the possibility of there being no such alternatives in a particular case: if only one option is assessed as meeting the objectives, there will be no “reasonable alternatives” to it.*

*vi) The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process”.*

### 4.2 Appraisal of Alternatives

- 4.2.1 The Preferred Options in the draft Plan (Preferred Options January 2019) that was consulted on between 16<sup>th</sup> January and 13<sup>th</sup> March 2019 were principally formulated on the basis of providing for objectively assessed needs for housing and other uses within the Borough, as required under paragraph 11 of the NPPF18 and the available evidence. The amount of housing required in Ipswich was based on the standardised methodology in the NPPF18, the mix of housing on Part 2 of the Ipswich Strategic Housing Market Area Assessment (SHMA) (2017) and the level of affordable housing. The question of uplift to the housing figure was considered but rejected because there are no strategic growth plans adopted across the County; investment in major infrastructure in the form of the

Ipswich Northern Routes, which could unlock more growth, is not committed; because of the Borough's limited capacity due to its constrained urban boundary; and to accord with the agreed ISPA Vision as set out in the Statement of Common Ground.

- 4.2.2 The housing need was further considered by the Council following Regulation 18 consultation on the Preferred Options Plan documents.
- 4.2.3 Employment needs have been considered on the basis of the Ipswich Economic Area Sector Needs Assessment (2017) and the Ipswich Economic Area Employment Land Supply Assessment (2018). The EEFM jobs target has been selected by the Council due to the significant material difference in jobs growth for Ipswich Borough Council. This jobs target is considered to be a more appropriate balance with the identified housing target. Objectively assessed needs for other uses such as retail provision and gypsy and traveller accommodation have also been used as the starting point for drafting the preferred options. The majority of the evidence used has been reviewed jointly with neighbouring authorities which together form the ISPA. This is to consider cross-boundary needs arising from the tightly drawn administrative boundary around Ipswich.
- 4.2.4 Beyond the objectively assessed needs, the preferred options have also been arrived at due to the need to incorporate revisions to the NPPF, which occurred in July 2018. For example, Policy CS12 'Affordable Housing' has been revised to reflect the amended definitions of affordable housing in the NPPF. Other policies have been amended on the basis of monitoring results that the Council has collected. An example of this includes the amendments to the Central Shopping Area Policy DM27 to respond to the declining performance of retail uses in the town centre. New policies, such as, Policy DM28 'The Evening and Night-time Economy' and Policy DM3 'Air Quality' have been introduced in consideration of qualitative and quantitative feedback received from other departments and users within and outside the Council where appropriate.
- 4.2.5 A review of site allocations contained within the Site Allocations and Policies DPD (2017) has been undertaken on the basis of a comprehensive update to the Strategic Housing and Employment Land Availability Assessment (SHELAA) which is published alongside the Local Plan Review Preferred Options. This update includes the consideration of unimplemented housing and economic allocations, land ownership, land submitted through 'Call for Sites' and issues and options consultations during 2017, as well as other considerations. Additions, amendments and removals of housing and economic sites within the Core Strategy and Policies DPD Review and the Site Allocations and Policies DPD Review have been undertaken on the basis of the recent update to the SHELAA.
- 4.2.6 The SHELAA included the consideration of two remaining areas of greenfield land at the edge of the Borough: land at Humber Doucy Lane in the north east, and land at Whitton Church Lane/Thurleston Lane in the north west. Whilst both areas have constraints, the work on the SHELAA concluded that some of the land in north west Ipswich was not suitable, for example due to protected allotments, and other land that may be suitable was not available or achievable for development at this time. Sites within the strategic allocation at north east Ipswich at the northern end of Humber Doucy Lane were actively promoted through the adopted Local Plan process and the call for sites process in 2017. The allocation for future growth identified at the north end of Humber Doucy Lane is identified to meet future need after the substantial completion of the Ipswich Garden Suburb and its associated infrastructure. This allocation will need to be master planned with East Suffolk Council, with whom there have been positive discussions about the deliverability of necessary infrastructure. Land

adjoining the strategic allocation in East Suffolk Council's land has been allocated in the emerging Suffolk Coastal Local Plan which is currently at examination.

4.2.7 It should also be noted that throughout the plan-making process, the Council's decision making has been informed by the sustainability performance of options as per the accompanying SA process. Sustainability is a fundamental goal and a consistent thread running throughout the Plan. Furthermore, the SA has provided recommendations to the Council in an iterative process that are typically in the form of policy wording changes, or development management related recommendations for site allocations, designed to help avoid or minimise negative impacts and to enhance positive impacts. Many of these recommendations have been adopted by the Council and have made a provable improvement to the sustainability performance of the Final Draft Ipswich Local Plan as set out in Chapter 2.

## 4.3 Justification for the selection and rejection of reasonable alternative strategic options

4.3.1 Tables 4-1 and 4-2 sets out reasons for rejecting the options that were not selected.

Table 4-1: Reasons for not selecting strategic growth options

Name	Scale of growth	Description	Reason(s) for rejection/ selection
Old OAN	8,622 homes and 15,580 jobs	A trend-based scenario based on the forecast employment needs of the Borough and the 2018 update to the OAN based on the standardised method.	This represents the previously (Preferred Options) agreed option. The number of homes would be 612 greater than established under the new standardised methodology. In addition the jobs target is approximately 6,000 higher than the latest EEFM 2017 demonstrates. This would have some economic and social benefits compared to alternative scenario D, although these are not significant enough to warrant a distinction. However, the limited availability of brownfield sites would result in difficulties in delivering the high jobs target and higher housing number and what land that is available would be developed at very high density which makes it difficult to deliver environmental and social objectives of the Local Plan. It would have potential detrimental impacts on biodiversity, flooding, cultural heritage and the townscape. Furthermore, it would make the delivery of the preferred spatial option 1 very challenging as the competition between jobs growth and housing growth would put pressure on greenfield land and in locations that are less sustainable. This approach is consequently rejected.
Alternative Scenario A	11,420 homes and 19,040 jobs	A trend-based scenario based on the forecast employment needs of the Borough and the 2017 calculated OAN.	The number of homes would be 3,410 greater than established under the new standardised methodology. In addition the jobs target would effectively be double (9,540) that of the 2017 EEFM. This would have significant economic and some social benefits compared to alternative scenario D, although this is mainly limited to growth & prosperity and housing availability. However, the limited availability of brownfield sites would result in difficulties in delivering the significantly higher levels of housing and jobs, and what land that is available would be developed at extremely high densities which makes it difficult to deliver environmental and social objectives of the Local Plan. It would also make the delivery of the preferred spatial option 1 very challenging as there is insufficient land within the Borough to realistically accommodate this level of growth. This would inevitably put significant pressure on the development of greenfield land, much of which would likely be outside the Borough boundary, in locations that are less sustainable than those anticipated under spatial option 1. Consequently, this approach is rejected.
Alternative Scenario B	25,837 dwellings and 32,376 jobs	A policy-led scenario for significant economic growth, with a 20% increase in the 2017-	The number of homes would be 7,351 higher than the combined housing targets of the Suffolk Coastal LP and Ipswich Borough LP. In addition the jobs target would effectively be double (16,376) that of the two authorities combined jobs targets. This would have significant economic and some social benefits compared to alternative scenario D, although this is mainly limited to growth & prosperity and housing availability. However, the limited availability of brownfield sites would result in difficulties in delivering the

Name	Scale of growth	Description	Reason(s) for rejection/ selection
		homes target relative to OAN. This high growth scenario is for both Ipswich and Suffolk Coastal combined.	significantly higher levels of housing and jobs, and what land that is available would be developed at extremely high densities which makes it difficult to deliver environmental and social objectives of the Local Plan. It would also make the delivery of the preferred spatial option 1 very challenging as there is insufficient land within the Borough to realistically accommodate the Borough's share of this growth. It would also compromise the ability of the Suffolk Coastal Local Plan to deliver its approach to the location of growth which is a combination of options 4 and 6. This would inevitably put significant pressure on the development of greenfield land, much of which would likely be outside the Borough boundary, in locations that are less sustainable than those anticipated under the spatial options of the Ipswich Borough and Suffolk Coastal Local Plans. Consequently, this approach is rejected.
Alternative Scenario C	30,143 dwellings and 32,376 jobs	An infrastructure-led scenario based on a high increase in growth in Ipswich, with a 40% increase in the 2017-homes target relative to OAN. This high growth scenario is for both Ipswich and Suffolk Coastal combined.	This scenario is very similar in terms of anticipated impacts to that of alternative scenario B. The number of anticipated dwellings would be higher than set out in under scenario B, and this would represent a 11,567 increased compared to the combined targets set out in the preferred approaches for the Ipswich Borough and Suffolk Coastal Local Plans. However, it would have the most detrimental impact of all the options in terms of soils and minerals and performs equally as negative as the other aspects of scenario B. Therefore, for the reasons set out under alternative scenario B, and the exacerbating impact on soils and minerals compared to this other scenario, scenario C has been rejected. The economic benefits of improved health and education are not considered to outweigh the unrealistic deliverability of this option and the social and environmental negative impacts that would accrue.
Alternative Scenario D	8,010 homes and 9,500 jobs	PPG compliant (new OAN).	This is the scenario based on the new objectively assessed need. Overall this scenario option shared similar impacts to that of alternative scenarios E, F and G. However, it was found to also include minor positive impacts in terms of biodiversity and geodiversity, landscapes and town and transport and movement compared to these other scenarios. Given that this represents the methodology to housing growth set out in the NPPF and PPG and the jobs growth is considered to be ambitious but deliverable, this has been selected as the preferred approach.
Alternative Scenario E	8,838 homes and 15,580 jobs	PPG compliant in being 2014 based plus some uplift.	The number of homes would be 828 greater than established under the new standardised methodology. In addition the jobs target is approximately 6,000 higher than the latest EEFM 2017 demonstrates. This would have some minor economic and social benefits compared to alternative scenario D, although these are not significant enough to warrant a distinction. However, the limited availability of brownfield sites would result in difficulties in delivering the high jobs target and higher housing number and what land that is available would be developed at very high density which makes it difficult to deliver environmental and social objectives of the Local Plan. It would only have neutral impacts in terms of biodiversity and geodiversity, landscape and townscapes and only minor positive effects in terms of transport and movement. This is not as positive as Scenario D. Furthermore, it would make the delivery of the preferred spatial option 1 very challenging as the competition between jobs growth and housing growth would put pressure on greenfield land and in locations that are less sustainable. Therefore this approach has been rejected.
Alternative Scenario F	8,802 homes and 15,580 jobs	PPG compliant in being 2014 based plus some uplift.	The number of homes would be 792 greater than established under the new standardised methodology. In addition the jobs target is approximately 6,000 higher than the latest EEFM 2017 demonstrates. This would have some minor economic and social benefits compared to alternative scenario D, although these are not significant enough to warrant a distinction. However, the limited availability of brownfield sites would result in difficulties in delivering the high jobs target and higher housing number and what land that is available would be developed at very high density which makes it difficult



Name	Scale of growth	Description	Reason(s) for rejection/ selection
			to deliver environmental and social objectives of the Local Plan. It would only have neutral impacts in terms of biodiversity and geodiversity, landscape and townscapes and only minor positive effects in terms of transport and movement. This is not as positive as Scenario D. Furthermore, it would make the delivery of the preferred spatial option 1 very challenging as the competition between jobs growth and housing growth would put pressure on greenfield land and in locations that are less sustainable. Therefore this approach has been rejected.
Alternative Scenario G	9,612 homes and 15,580 jobs	PPG compliant in being 2014 based plus more uplift.	The number of homes would be 1,602 greater than established under the new standardised methodology. In addition the jobs target is approximately 6,000 higher than the latest EEFM 2017 demonstrates. This would have some minor economic and social benefits compared to alternative scenario D, although these are not significant enough to warrant a distinction. However, the limited availability of brownfield sites would result in difficulties in delivering the high jobs target and higher housing number and what land that is available would be developed at very high density which makes it difficult to deliver environmental and social objectives of the Local Plan. It would only have neutral impacts in terms of biodiversity and geodiversity, landscape and townscapes and only minor positive effects in terms of transport and movement. This is not as positive as Scenario D. Furthermore, it would make the delivery of the preferred spatial option 1 very challenging as the competition between jobs growth and housing growth would put pressure on greenfield land and in locations that are less sustainable. Therefore, this approach has been rejected.

Table 4-2: Reasons for not selecting strategic spatial options

Name	Description	Reason(s) for rejection
Spatial Option 1	Higher-density urban regeneration	This spatial option was selected because it has superior positive impacts compared to the other spatial options in terms of soils and minerals, waste, greenhouse gases and energy, coast and estuaries, biodiversity and geodiversity, landscapes and townscapes, town centres, transport and movement and digital infrastructure. It did perform poorer than the other 2 options, either jointly or individually, in terms of quality of homes and work but this was not considered to outweigh the wider range of benefits identified.
Spatial Option 2	Increased development beyond the Borough boundary	This spatial option was rejected because it performed poorer than spatial option 1 in terms of impacts; poverty and exclusion, air quality, soils and minerals, waste, greenhouse gases and energy, flooding, coast and estuaries, biodiversity and geodiversity, landscape and townscapes, town centres, transport and movement and digital infrastructure. This option did have some benefits in terms of quality of homes and work but this did not outweigh the poorer impacts identified above.
Spatial Option 3	Changing the use of existing land in the Borough to housing	This spatial option was rejected because it performed poorer than spatial option 1 in terms of impacts on; poverty and exclusion, water, soils and minerals, waste, greenhouse gases and energy, coast and estuaries, biodiversity and geodiversity, cultural heritage, landscape and townscapes, growth and prosperity, town centres, transport and movement and digital infrastructure. This option did have some benefits in terms of quality of homes and work but this did not outweigh the poorer impacts identified above.

## 5 Measures to monitor significant environmental effects

- 5.1.1 The SA has identified the likely effects of the Local Plan on SA Objectives. An indication of the certainty and timescales of these effects has also been predicted. However, there is a risk that the sustainability effects of the Local Plan, including the effects of specific aspects or the cumulative effects of Local Plan in-combination, are different to those anticipated due to unforeseen circumstances.
- 5.1.2 The SEA Regulations require that potential significant effects which may occur as a result of the implementation of the strategy be monitored. The SEA Regulations state that: *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”*.
- 5.1.3 It is anticipated that the Ipswich Borough Council will be monitoring the implementation and effects of the Local Plan post-adoption to feed into future plan review and revision. Table 5-1 suggest a possible list of indicators that could be considered in developing an Ipswich LPR Monitoring Framework.

Table 5-1: Proposed Monitoring Framework

SA Objective	Effect to be monitored	Indicators	Data source	Frequency
1 - To reduce poverty and social exclusion	<ul style="list-style-type: none"> <li>Inequality</li> <li>Rates of poverty</li> </ul>	1. Proportion of population who live in wards that rank within the 10% most deprived in the country: Reduce the number of wards with LSOAs in the bottom 10% most deprived	1. Index of Multiple Deprivation	Every three years
2 - To meet the housing requirements of the whole community	<ul style="list-style-type: none"> <li>Ensure housing growth meets demand in the IHMA</li> <li>Deliver a mix of high-quality housing to meet local needs</li> <li>Address homelessness</li> </ul>	1. Affordable housing provision In Ipswich and at the Garden Suburb 2. Living environment deprivation: To improve Ipswich's rank for living environment deprivation 3. Number of housing completions: To meet local need	1. Development management IBC 2. Index of Multiple Deprivation 3. Rough Sleeping Statistics, England <a href="https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness">https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness</a>	Every three years
3 - To improve the health of the population overall and reduce health inequalities	<ul style="list-style-type: none"> <li>Promote healthier lifestyles</li> <li>Tackle health inequalities</li> </ul>	1. Number of wards in the bottom 10% most deprived: Reduce the number of wards with LSOAs in the bottom 10% most deprived 2. % of physically active adults 3. Area of open space created through new development: To increase provision	1. Index of Multiple Deprivation 2. Public Health England ( <a href="https://fingertips.phe.org.uk/">https://fingertips.phe.org.uk/</a> ) 3. Development management IBC	Every three years
4 - To improve the quality of where people live and work	<ul style="list-style-type: none"> <li>Reduce anti-social behaviour and crime</li> </ul>	1. Recorded crime per 1,000 population: To tie in with Police targets relating to reducing crime levels by 2031	1. Office for National Statistics data <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/recordedcrimedatatcommunitysafetypartnershiplocalauthoritylevel/current">https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/recordedcrimedatatcommunitysafetypartnershiplocalauthoritylevel/current</a>	Annual
5 - To improve levels of education and skills in the population overall	<ul style="list-style-type: none"> <li>Raising educational attainment</li> <li>Raising skills levels</li> </ul>	1. Average Attainment 8 scores for Key Stage 2 students in Suffolk 2. Proportion of the population aged 16-64 with no qualifications	1. National statistics data for Revised GCSE and equivalent results <a href="https://www.gov.uk/government/statistics/">https://www.gov.uk/government/statistics/</a> 2. Local Government Association data <a href="https://lginform.local.gov.uk/reports/">https://lginform.local.gov.uk/reports/</a>	Annual
6 - To conserve and enhance water quality and resources	<ul style="list-style-type: none"> <li>Protection and enhancement of water quality</li> <li>Provision of adequate water supply infrastructure to meet demand arising from new development</li> </ul>	1. Daily domestic water use (per capita consumption, litres): Number of new homes meeting standard of 110 litres/person/day 2. Water resource availability 3. Proportion of the Gipping's surface waters in good ecological and good chemical status	1. Development management IBC (annually) 2. Water Resource Management Plans for the area (five years) 3. Environment Agency data <a href="https://environment.data.gov.uk">https://environment.data.gov.uk</a>	Annual/ Every five years
7 - To maintain and where possible improve air quality	<ul style="list-style-type: none"> <li>Protection and enhancement of air quality</li> <li>Protection of those most at risk of poor health related to poor air quality</li> </ul>	1. Number and distribution of AQMAs: No new AQMAs to be designated in the Borough 2. Quantity of residents living in or within 200m of AQMAs	1. Development management IBC 2. Development management IBC	Every three years

SA Objective	Effect to be monitored	Indicators	Data source	Frequency
8 - To conserve and enhance soil and mineral resources	<ul style="list-style-type: none"> <li>Remediation of contaminated sites and avoidance of further contamination</li> <li>Protection of Best and Most Versatile agricultural land</li> <li>Protection and enhancement of soil quality</li> </ul>	<ol style="list-style-type: none"> <li>Area of contaminated land returned to beneficial use: Target to be established (Ipswich Borough Council).</li> <li>Density of new residential development</li> <li>Percentage of development on previously developed land</li> <li>Quantity of BMV soils developed on</li> </ol>	<ol style="list-style-type: none"> <li>Development management IBC</li> <li>Development management IBC</li> <li>Development management IBC</li> <li>Development management IBC using data from DEFRA at <a href="https://magic.defra.gov.uk/MagicMap">magic.defra.gov.uk/MagicMap</a></li> </ol>	Every three years
9 - To promote the sustainable management of waste	<ul style="list-style-type: none"> <li>Promotion of resource efficiency through sustainable design and construction</li> <li>Management of waste arisings in accordance with the waste hierarchy</li> </ul>	<ol style="list-style-type: none"> <li>Total household waste collected and total household waste sent for recycling</li> </ol>	<ol style="list-style-type: none"> <li>National statistics Local authority collected and household waste statistics <a href="https://data.gov.uk/">https://data.gov.uk/</a></li> </ol>	As frequently as the data is available
10 - To reduce emissions of greenhouse gases from energy consumption	<ul style="list-style-type: none"> <li>Reduction of emissions of carbon dioxide (CO<sub>2</sub>) and other GHGs</li> </ul>	<ol style="list-style-type: none"> <li>Grand total carbon emissions and average per capita CO<sub>2</sub> emissions in Ipswich</li> </ol>	<ol style="list-style-type: none"> <li>National statistics Emissions of carbon dioxide for Local Authority Areas <a href="https://data.gov.uk/">https://data.gov.uk/</a></li> </ol>	Annual
11 - To reduce vulnerability to climatic events and flooding	<ul style="list-style-type: none"> <li>Protection of flood plains</li> <li>Adaptation to the effects of climate change e.g. extreme weather, sea level rise.</li> <li>Promotion of sustainable drainage systems</li> </ul>	<ol style="list-style-type: none"> <li>Agency advice: No planning applications permitted contrary to Environment Agency advice on flooding (Ipswich Borough Council)</li> <li>Percentage of developments incorporating SuDS</li> <li>Tree canopy change over the Plan period</li> </ol>	<ol style="list-style-type: none"> <li>Development management IBC</li> <li>Development management IBC</li> <li>Corporate Mapping IBC</li> </ol>	Every three years
12 - To safeguard the integrity of the coast and estuaries	<ul style="list-style-type: none"> <li>Protect existing properties and other land uses on the coast and estuaries</li> </ul>	<ol style="list-style-type: none"> <li>Flood and Coastal Erosion Risk Management: Efficacy of the tidal surge barrier (Environment Agency).</li> </ol>	<ol style="list-style-type: none"> <li>Environment Agency</li> </ol>	Every three years
13 - To conserve and enhance biodiversity and geodiversity	<ul style="list-style-type: none"> <li>Protection and enhancement/creation of new biodiversity/habitat</li> <li>Protection and enhancement/creation of new green infrastructure provision</li> <li>Protection of species at risk</li> <li>Increasing canopy cover</li> <li>Protection and enhancement of European sites</li> </ul>	<ol style="list-style-type: none"> <li>Extent and condition of key habitats for which Biodiversity Action Plans have been established: To maintain / enhance condition of BAP habitats.</li> <li>Net change in extent of protected habitat: No net loss of area of protected habitat. To increase the tree canopy cover in the borough to 22% by 2050 (Ipswich Borough Council).</li> <li>Canopy cover: net increase overall</li> </ol>	<ol style="list-style-type: none"> <li>Planning Policy IBC</li> <li>Planning Policy IBC</li> <li>Corporate Mapping IBC</li> </ol>	Annual
14 - To conserve and where appropriate enhance areas and assets of historical and archaeological importance	<ul style="list-style-type: none"> <li>Conservation and enhancement of the IHMA's cultural heritage.</li> <li>Protection/enhancement of local character and distinctiveness.</li> </ul>	<ol style="list-style-type: none"> <li>Number of heritage assets 'at risk': To reduce number of heritage assets 'at risk' (Ipswich Borough Council).</li> <li>Number of archaeological investigations carried out at development sites and notable finds</li> </ol>	<ol style="list-style-type: none"> <li>Development management IBC</li> <li>Development management IBC</li> </ol>	Every five years

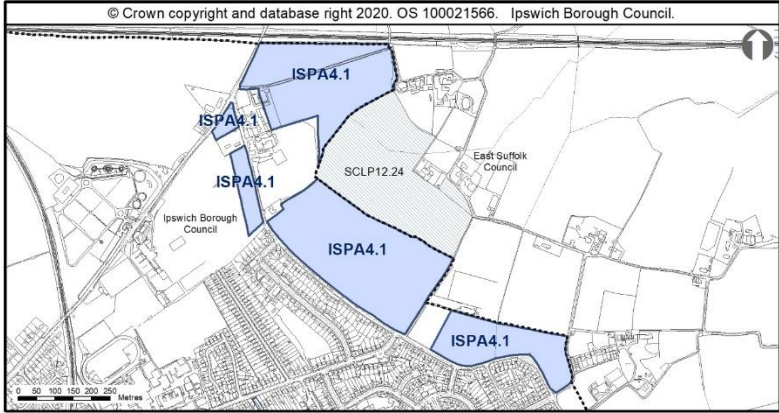
SA Objective	Effect to be monitored	Indicators	Data source	Frequency
15 - To conserve and enhance the quality and local distinctiveness of landscapes and townscape	<ul style="list-style-type: none"> <li>Conservation and enhancement of the IHMA's landscape character</li> <li>Protection/enhancement of character and views of AONB</li> </ul>	<ol style="list-style-type: none"> <li>Quantity of development required to make a RAMS contribution (i.e. sites 13km of European protected sites)</li> <li>Quantity of greenfield land lost to development</li> </ol>	<ol style="list-style-type: none"> <li>Development management IBC</li> <li>Development management IBC</li> </ol>	Every five years
16 - To achieve sustainable levels of prosperity and growth throughout the plan area	<ul style="list-style-type: none"> <li>Delivery of employment land that supports economic diversification and the creation of high quality, local jobs.</li> <li>Supporting the growth and development of existing businesses.</li> <li>Providing job opportunities in sustainable locations.</li> <li>Ensuring tourism growth is sustainable.</li> </ul>	<ol style="list-style-type: none"> <li>Unemployment rate: To improve Ipswich's rank in the indices of multiple deprivation by 2031 for income and employment deprivation</li> <li>Employment development on employment land: To increase the amount of employment development on employment land each year.</li> <li>Average wage: To increase the average wage within Ipswich</li> </ol>	<ol style="list-style-type: none"> <li>Index of Multiple Deprivation</li> <li>Annual Employment Land Availability Assessment (IBC)</li> <li>ONS data <a href="https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datalist?size=50&amp;sortBy=relevance">https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datalist?size=50&amp;sortBy=relevance</a></li> </ol>	Every three years
17 - To maintain and enhance the vitality and viability of town and retail centres	<ul style="list-style-type: none"> <li>Enhancing town centres, district and local centres and villages.</li> <li>Improving the viability of Ipswich.</li> </ul>	<ol style="list-style-type: none"> <li>Unemployment in Ipswich: To reduce the proportion of people unemployed in Ipswich</li> <li>No. / Percentage of vacant retail units: To reduce number of vacant units in defined centres</li> </ol>	<ol style="list-style-type: none"> <li>ONS data</li> <li>Development management IBC</li> </ol>	Every three years
18 - To encourage efficient patterns of movement, promote sustainable travel of transport and ensure good access to services	<ul style="list-style-type: none"> <li>Reducing the need to travel, particularly by private motor car.</li> <li>Promotion of sustainable forms of transport including public transport, walking and cycling.</li> </ul>	<ol style="list-style-type: none"> <li>Extent of the PRoW network and cycle paths: To increase the quantity and quality of pedestrian and cycle routes</li> </ol>	<ol style="list-style-type: none"> <li>Highway Authority (Suffolk County Council)</li> </ol>	Every three years
19 - To ensure that the digital infrastructure available meets the needs of current and future generations	<ul style="list-style-type: none"> <li>Provision of services through technology.</li> <li>Supporting the growth of the (digital) economy.</li> <li>Realising opportunities for social inclusion and reducing rural isolation.</li> </ul>	<ol style="list-style-type: none"> <li>To improve average internet speeds in Ipswich and to increase the proportion of Ipswich's residents with access to high-speed and full fibre internet</li> </ol>	<ol style="list-style-type: none"> <li><a href="https://labs.thinkbroadband.com/local/index.php?area=E14000761">https://labs.thinkbroadband.com/local/index.php?area=E14000761</a></li> </ol>	Annual

## 6 Conclusion

- 6.1.1 This report satisfies the requirements of a Post Adoption Statement as per the SEA Regulations. The Ipswich LPR, at each iteration, has been appraised for its likely significant effects against each of the SA Objectives within the Framework. The SA is a process that has been highly integrated with the development of the Local Plan, involving a close working relationship between the SA team and the Borough Council. The SA has provided a structured way of considering the impacts of a wide range of options.
- 6.1.2 The SA is used as a tool for consultation, providing the general public and statutory bodies with a breakdown of how the Local Plan has been developed in a way that will ensure that it can contribute to more sustainable development. The consultation, involvement and engagement process has given stakeholders the opportunity to provide feedback and suggestions towards enhancing the overall sustainability of the Local Plan.
- 6.1.3 Throughout the process, the SA has provided recommendations which could help avoid or mitigate potential negative effects or enhance positive effects. Recommendations made to the Borough Council have been a key feature of the SA process from its inception. Key recommendations made, and the responses to these, are presented in previous SA reports and in Chapter 3 of this document. Ipswich Borough Council has proved highly receptive to measures for enhancing the sustainability performance of the Local Plan and subsequently made enhancements and amendments throughout.

# Appendix A

Table A-1: Further Modifications proposed

MM Ref	Page	Policy/ Paragraph	Main Modification (further modifications set out in green highlight)
MM17	41	Policy ISPA4	<p><b><u>'Policy ISPA4: Cross Boundary Working to Deliver Sites Land at the Northern end of Humber Doucy Lane (ISPA4.1)</u></b></p>  <p><b><u>23.28ha of land compromising at the northern end of Humber Doucy Lane, identified on the Policies Map as ISPA4.1, is allocated for 449 dwellings and associated infrastructure to come forward in conjunction with land allocated in Policy SCLP12.24 of the Suffolk Coastal Local Plan in East Suffolk as a cross boundary site. 60% of the site within Ipswich Borough is allocated for housing and 40% is allocated for secondary uses, comprising open space and other green and community infrastructure.</u></b></p> <p><b><u>e. A layout and design that incorporates a 'green trail' walking and cycling route around the edge of Ipswich, which also contributes positively to the enhancement of strategic green infrastructure to deliver benefits to both people and biodiversity and to help new developments deliver biodiversity net gain; and</u></b></p>

MM Ref	Page	Policy/ Paragraph	Main Modification (further modifications set out in green highlight)										
MM36	65 – 66	Policy CS7	<p><b>'POLICY CS7: THE AMOUNT OF NEW HOUSING REQUIRED</b></p> <p><b>Housing Land Supply</b></p> <p>Ipswich Garden Suburb (3,500 minus <del>232</del> <u>205</u> completions expected late 2036 and <del>1,888</del> <u>1,915</u> granted planning permission in January 2020) <span style="float: right;"><del>3,268</del> <u>1,380</u></span></p> <p>Northern end of Humber Doucy Lane allocated through policy ISPA4 <span style="float: right;"><del>496</del> <u>449</u></span></p> <p>Site Allocations through <b>policy SP2 of the Site Allocations Plan policies in the SAP and AAP</b> <span style="float: right;"><del>2,750</del> <u>2,880</u></span></p> <p><b>Sub-total</b> <span style="float: right;"><del>6,514</del> <u>4,709</u></span></p> <p><b>Windfall sites</b> <del>2022</del> <u>2023</u> – 2036 @ 50 p.a. <span style="float: right;"><del>700</del> <u>650</u></span></p> <p><b>Total</b> <span style="float: right;"><del>7,214</del> <u>5,359</u></span></p>										
MM166	12	Paragraph 3.2, Objective 10	<p>Amend paragraph 3.2, objective 10 to read as follows:</p> <p>'Objective 10 To retain, <u>improve</u> and provide high quality and sustainable education <u>facilities</u>, health <u>facilities</u>, and sports and <u>cultural</u> facilities and other key elements of community infrastructure <u>in locations accessible by sustainable means and in time to meet the</u> local demand.'</p>										
MM201	N/A	New Policy	<p><b>'New Policy Felixstowe Road (IP010)</b></p> <p><b><u>o. S106 contributions as appropriate will be required towards education and early years provision, library provision, utilities, open space, air quality mitigation, transport mitigation and transport infrastructure as appropriate to the scale of the development and in line with the requirements of Policy CS17; and</u></b></p>										
MM168	17	Policy SP2	<p><b>'Policy SP2 Land allocated for housing <u>outside the IP-One Area</u></b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">IP067a</td> <td style="width: 50%;">Former British Energy Site</td> <td style="width: 15%;">0.38ha</td> <td style="width: 10%;">17</td> <td style="width: 15%;">45dph</td> </tr> <tr> <td></td> <td><b>This is the northern section only and is subject to resolving odour issues to the satisfaction of IBC</b></td> <td></td> <td></td> <td></td> </tr> </table>	IP067a	Former British Energy Site	0.38ha	17	45dph		<b>This is the northern section only and is subject to resolving odour issues to the satisfaction of IBC</b>			
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MM Ref	Page	Policy/ Paragraph	Main Modification (further modifications set out in green highlight)								
			<div data-bbox="645 296 1491 746"> </div> <p data-bbox="645 775 779 799"><b>Constraints:</b></p> <ul data-bbox="645 831 1839 922" style="list-style-type: none"> <li>• <b>Access constraints will need to be resolved before development can commence. A preliminary ecological survey is required. A scheme showing how net biodiversity gains would be achieved would be required in accordance with Policy DM8;</b></li> </ul>								
MM268	N/A	New Policy	<p data-bbox="510 938 1167 962"><b><u>'New Policy Housing Allocations in the IP-One Area</u></b></p> <table border="1" data-bbox="510 986 1888 1082"> <tr> <td data-bbox="510 986 633 1082"><b><u>IP011c</u></b></td> <td data-bbox="633 986 999 1082"><b><u>Smart Street, Foundation Street (North)</u></b></td> <td data-bbox="999 986 1229 1082"><b><u>0.08</u></b></td> <td data-bbox="1229 986 1417 1082"><b><u>7</u></b></td> <td data-bbox="1417 986 1888 1082"><b><u>90dph (DM23a lower end of range)</u></b></td> </tr> </table>				<b><u>IP011c</u></b>	<b><u>Smart Street, Foundation Street (North)</u></b>	<b><u>0.08</u></b>	<b><u>7</u></b>	<b><u>90dph (DM23a lower end of range)</u></b>
<b><u>IP011c</u></b>	<b><u>Smart Street, Foundation Street (North)</u></b>	<b><u>0.08</u></b>	<b><u>7</u></b>	<b><u>90dph (DM23a lower end of range)</u></b>							

MM Ref	Page	Policy/ Paragraph	Main Modification (further modifications set out in green highlight)
			<div data-bbox="647 296 1518 758"> </div> <p data-bbox="647 783 784 810"><b><u>Constraints:</u></b></p> <ul data-bbox="647 839 1809 901" style="list-style-type: none"> <li data-bbox="647 839 1809 901">• <b>The site layout should allow for improvements to the <span style="background-color: #90EE90;">street</span> frontages such as footway and cycleway provision or widening, and tree planting;</b></li> </ul>

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