



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

**of**

**Draft Submission Core Strategy and Policies**

**For Ipswich Borough Council**

**August 2009**

**Prepared by the Research & Intelligence Team, Planning and Performance Improvement,  
Suffolk County Council, in association with Ipswich Borough Council**



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# **1. NON-TECHNICAL SUMMARY**

## **1.1 Non-technical summary**

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

**1.1.2** This report sets out the results of the sustainability appraisal of the Ipswich Borough Core Strategy and Policies Document that will when formally adopted, form part of its Development Plan Framework.

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

**1.1.4** 53 policies were appraised, all with the alternative of non-implementation. Only one policy was outscored by the alternative on non-implementation; however this is a policy which reflects national targets for house building. It is considered that the negative impacts could outweigh the positive impacts of this high level of housing provision for Ipswich.

**1.1.5** The appraisal revealed a number of aspects such as this that needed to be mitigated, some of which are achieved by the application in tandem of other policies so no further action is required. The following sets out the common themes emerging that need to be addressed when constructing the final wording of the policies:

**1.1.6** Flood risk: There is a need to include mention of the need for design sensitive to flood risk for properties in flood zones in the short to medium term before the tidal barrier is completed. This is however covered to some extent in policy CS18 where phasing of development is encouraged to ensure waterside dwellings are completed after the strategic flood defence is implemented.

**1.1.7** Waste minimisation – the plan overall appears to do little to encourage waste minimisation. Reference to residential and non residential development conforming to BREEAM standards of construction incorporate design aspects to ensure that new development has planned space for 3 bins to facilitate recycling. Aside from this, it is important to address issues resulting from high density development and waste from employment land.

**1.1.8** Sustainable transport - Whilst the plan is strong on planning development in areas which are easy to reach and encouraging cycling, which should result in decreased traffic levels, there are opportunities to strengthen the plan through referring to public transport routes. Bus travel does not feature strongly outside of policies DC15 and DC16 in the plan, or in the policies relating to planning contributions. This is an opportunity to strengthen the plan in terms of sustainable transport, alleviating traffic further and increasing accessibility by incorporating this into all policies. It should be noted however that when considering the suite of policies, DC15 and DC16 should provide sufficient promotion of public / sustainable transport.

**1.1.9** Five areas are identified where policy wording could be strengthened.

**1.1.10** It is proposed that all of the indicators included in the SA framework are monitored. Particular attention needs to be given to the following to monitor the uncertainties

**1.1.11** For Policy CS20 where proposals for increased road capacity cannot be mitigated it is suggested that monitoring of traffic levels, congestion and air quality need to be undertaken.

**1.1.12** For Policy DC24 Loss of residential accommodation, the number of planning applications received, for what, and the decision, should be monitored to determine whether this policy results in less economic development.

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

**1.2.1** Implementation of the preferred policies as a group of policies, has the potential to build and maintain sustainable communities in Ipswich in the long term. The plan should make a difference to the quality of life of where people live, improving access to services and water and air quality. The latter is a result of the policies that seek to conserve and reuse water (eg Sustainable urban drainage) and activities that should reduce the level of traffic and congestion thereby improving air quality. Other strengths include preserving soil resources, achieved through the requirement to prioritise the use of previously developed land, as would be expected in an urban area.

**1.2.2** The plan will also encourage indigenous and inward investment through the quality of the environment it will create and this will help increase the number of jobs and level of prosperity. Social exclusion should be reduced by the implementation of policies to provide sustainable transport modes. However it is noted that one policy stands out as having a significantly negative impact on poverty and social inclusion relating to reduced levels of open space in affordable housing developments in certain circumstances.

**1.2.3** The plan is less effective at reducing waste, with the policies achieving a combined score of 2 suggesting waste minimisation or recycling are not significantly embedded in the plan. Although policies CS1 (sustainable development, encouraging renewable energy), CS4 (protecting our assets, encouraging recycling), CS17 (Delivering Infrastructure) and DC1, DC13 and DC14 (sustainable development, BREEAM standards, infill and subdivision) scored positively for waste reduction, there were missed opportunities in other policies. There is however a section of policy CS4 which states that all new developments must minimise waste generation throughout their construction period and lifetime. No statement about provision of community recycling facilities or household waste sites is evident, and this would represent a means to bolster the plan in this respect. Chapter 10 considers some further opportunities to improve this.

## **1.3 Difference the process has made**

**1.3.1** The Borough Council has been working on its sustainability appraisal alongside the development of its Local Development Framework. A Scoping Report was produced and consulted upon and an SA undertaken at the Issues and Options phase of plan development during 2006 and 2007.

**1.3.2** The work behind this written up appraisal has informed the production of the Core Strategy documents and ensured that social, environmental and economic impacts were considered as policies were developed. A few weaknesses remain which can be considered by the council as it evaluates comments on its Core Strategy and thereafter as it moves forward to submitting its development plan documents to the Government. The information set out within this document should also assist others with their responses to the Council and facilitate assessment of any alternatives that people may wish to put forward.

## **1.4 How to comment on this report**

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

Ipswich Borough Council

Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE  
Tel: 01473 432019 Web: [www.ipswich.gov.uk](http://www.ipswich.gov.uk) Email: [planningandregeneration@ipswich.gov.uk](mailto:planningandregeneration@ipswich.gov.uk)

## **2. INTRODUCTION**

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### **2.1 Purpose of the report**

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

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

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

**2.1.4** This SA assesses the Core Strategy and Policies being prepared by Ipswich Borough Council (IBC).

### **2.2 Compliance with SEA directive and regulations**

This SA is intended to fully comply with the requirements of the SEA Directive, as set out in “A Practical Guide to the Strategic Environmental Assessment Directive” September 2005. Chapter 12 sets out a quality assurance checklist designed to illustrate how the technical and procedural elements of the SEA process have been handled in this appraisal.

### 3. METHOD OF ASSESSMENT

#### 3.1 Approach adopted to Sustainability Appraisal

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

**3.1.2** The stages for appraisal are set out below.

*Table 3.1: The stages of a Sustainability Appraisal*

<b>Stage A: Setting the context and establishing the baseline</b>	
1. Identifying other relevant plans, programmes and environmental protection objectives	
2. Collecting baseline information	
3. Identifying environmental problems	
4. Developing SEA objectives and testing their compatibility	
5. Consulting on the scope of the SEA	
	<b>Output: Scoping Report</b>
<i>(published previously, see below)</i>	
<b>Stage B: Developing and refining alternatives and assessing effects</b>	
1. Testing the plan objectives against the SEA objectives	
2. Appraising strategic alternatives	
3. Predicting the effects of the plan, including alternatives	
4. Evaluating the effects of the plan, including alternatives	
5. Mitigating adverse effects	
6. Proposing measures to monitor the environmental effects of implementing the plan	
<b>Stage C: Preparing the Sustainability Appraisal Report</b>	
1. Preparing the Sustainability Appraisal Report	
	<b>Output: Sustainability Appraisal Report</b>
<b>Stage D: Consulting and decision making</b>	
1. Consulting on the draft plan and Sustainability Appraisal Report	
2. Appraising significant changes	
3. Appraising significant changes resulting from representations at the DPD Examination	
4. Decision making and provision of information	
	<b>Output: Sustainability Appraisal Statement</b>
<b>Stage E: Monitoring implementation of the plan</b>	
1. Finalising aims and methods for monitoring	
2. Responding to adverse effects	
	<b>Output: Included in Annual Progress Report on Plan implementation</b>

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

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

Ipswich Borough published a Scoping Report in March 2006. This was sent out for public consultation including statutory and key stakeholders for 6 weeks in March – April 2006. Ipswich Borough also commissioned TRL Ltd to undertake an independent assessment of compliance with the SA regulations.



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

In November 2007 a sustainability appraisal appraised the preferred options for the Core Strategy and Policies, IP-One Area Action Plan and Site Allocations and Policies and was published for public consultation. This SA is of the Proposed Submission Draft Core Strategy and policies for Ipswich developed during 2009. Detailed assessment sheets exist for all the Core Strategy policies being considered are shown in the appendix of this document. These include consideration of impacts, the do nothing alternatives and mitigation.

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

The Sustainability Appraisal for Regional Spatial Strategies and Local Development Documents guidance published by the ODPM (now the Department for Communities and Local Government) has been used in preparing this report. The SA drew upon contextual information from the SA report at preferred options stage in November 2007. The SA Report has been produced to go out with the Core Strategy for public consultation.

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

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

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

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

SA has been on going for the Core Strategy since the publication of the Issues and Options papers in 2006. A series of appraisal sheets were written up, together with recommendations for changes. However in the interests of making this SA report as useful to the plan preparation process as possible, and because the change between the Issues and Options, Preferred options and this document has been so great, this SA focuses on the sustainability of the final document, but draws on the assessments at previous stages.

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

The sustainability appraisal was carried out by the Research and Intelligence team within the Planning and Performance Specialist Support Function at Suffolk County Council.

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

The SA Scoping Report went to consultation in March 2006, and was sent to the statutory bodies, i.e. the Environment Agency, English Heritage, the Countryside Agency and English Nature (before their merger), key stakeholders as well as Suffolk County Council. The SA on the preferred options was subject to public consultation in January to March 2008.

## **3.5 Limitations of the assessment**

Baseline data has been updated where possible, but constraints on availability of information sometimes mean that data is some years out of date.

### **3.6 Technical deficiencies**

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

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

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

### **3.8 Appropriate Assessment**

According to the terms of the Habitats Directive (Article 6(3)), any plan that has a significant effect upon a site protected by the directive (Special Areas of Conservation, Special Protection Areas and Offshore Marine Sites) is subject to an appropriate assessment.

An Appropriate Assessment of the Core Strategy and policies has been undertaken by the Landscape Partnership.

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

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

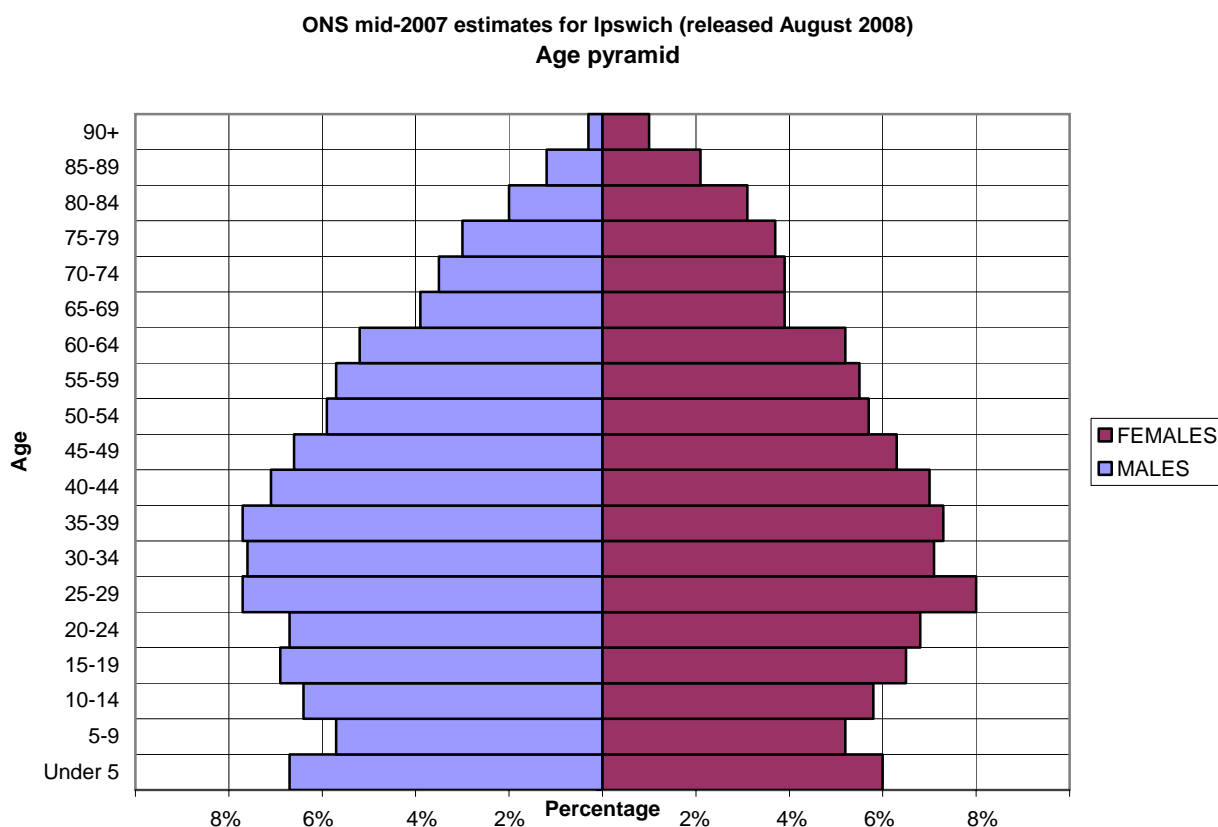
**4.1.1** Ipswich is situated in the East of England region. The Borough of Ipswich covers an area of 3,981 hectares (or 15.37 square miles). It is the county town and administrative centre of Suffolk. The town is located on the River Orwell approximately 12 miles from the Suffolk coastline. To the south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

**4.1.2** The Borough of Ipswich is the sole 'urban-only' local authority in Suffolk. It has a population density of 29.4 people per hectare, significantly above the Suffolk average of 1.76. (2001 Census)

### Social information

#### Population

Ipswich has a population of 121,000 (ONS Mid Year Estimates 2007). The age profile of Ipswich is as follows:



**4.1.3** The population of the Borough is predicted to rise by almost 20% between 2007 and 2021 to 138,700 (EERA). In terms of the age profile, the number of those under 15 years old is expected to rise by 5,500 (25%) to 28,000. The over 65's group is expected to rise by 3,400 (18%) to 23,000. The largest proportional increase, as you would expect, is in the 15-64 years age range where the population is expected to rise by almost 20,000 (26%) to 95,000.

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

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

*Table 4.1: Vital statistics on Ipswich*

Population	117,000 (2001) 121,000 (2007)
Numbers of Employed People	67,310
Top Employment Sectors (2007)	21,900 (32.8%) Public Administration 15,200 (22.6%) Finance, IT and other business 15,100 (22.5%) Distribution
Unemployment rate (April. 2009)	5.2%
School Year 13 Destinations (2008)	48.2% Higher Education
Ethnic Group (non white British)	9%
Heritage	602 listed buildings, 10 scheduled monuments, 14 conservation areas and 3 registered parks, gardens and cemeteries.
Average Annual House Build (2001 to 2009)	773.9
% of Housing built on previously developed land 2001 to / 2009	95%

#### **4.1.5 Deprivation**

According to the Index of Multiple Deprivation 2004 (IMD), Ipswich (as a local authority area in England) is placed 136th out of a total of 354. According to the IMD 2007 Ipswich is placed 99<sup>th</sup>. This means an increase in the rank of 37 places, meaning that levels of deprivation have worsened in Ipswich relative to the rest of the country. Several areas in Ipswich fall within the top 20% most deprived with one falling within the top 10%. At 2004, 1 in 3 of the population of Ipswich lived in an area within the top 25% most deprived areas in England. 7% of the population live in an area which is within the top 10% most deprived in England. The IMD 2007 shows little change here, and any significant shift of deprivation is not evident.

#### **4.1.6 Health & Well Being**

The overall death rate in Ipswich (per 100,000 population) in 2003 was 645.0. This was significantly above the Suffolk average of 609.6. This figure is down on the previous year but still remains high for Suffolk. The average life expectancy 2003-2007 for men in Ipswich is 77.3 years and for women it is 81.3 years.

#### **4.1.7 Education and Skills**

In 2008 data showed that Ipswich is below the Suffolk average for GCSE attainment levels (60.8% achievement 5+ A-C grades).

Ipswich has the third highest proportion of its population in Suffolk with no qualifications (17.8%) and the second lowest proportion with NVQ level 4 or higher (22.3%).

#### **4.1.8 Crime and Disorder**

The crime rate in Ipswich rose steadily and significantly since between 2001 and 2005. At 2004 it stood at 138.5 crimes per 1,000 population, the highest crime rate in Suffolk. The rate has now dropped to 117.4 at 2008-9. Both of these rates are above the average rate for England and Wales, as well as being the highest in Suffolk.

#### **4.1.9 Access to Services and Facilities**

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

#### **4.1.10 Employment**

The average hourly earnings for Ipswich at 2008 was £10.58. This is below the regional average of £12.44. The figure has however been increasing year-on-year since 2002.

**4.1.11** Unemployment in the Borough has risen since late 2008. It is currently (April 2009) at 5.2% which is high in comparison to the East of England average of 3.5%. Long term unemployment (longer than 12 months) stands at 7.7%. This is still significantly higher than the Suffolk average in this instance, which is 3.5%.

**4.1.12** The draft Regional Spatial Strategy (RSS) requires 18,000 new jobs to be located in the Borough of Ipswich.

#### **4.1.13 Housing**

As of April 2009 the Borough had a housing stock of 57,924 properties (SCC Council Tax records). The 1991 census states that Ipswich had 47,748 households. Census 2001 states that Ipswich had 49,869 households. This shows an increase of over 2,000 households from 1991 – 2001. Of the Census 2001 total, some 8,159 units (16.3%) were Council-owned; 2,787 (5.6%) units were owned by Registered Social Landlords (RSL) and 32,275 (65%) units were owner occupiers.

**4.1.14** According to DCLG at April 2009, 3 people per 1000 households in Ipswich are homeless, the Suffolk average is 1.7, regional average is 2.6. The number in temporary accommodation is 133, the Suffolk average number for LA's is 43.

**4.1.15** The percentage of completions which were affordable in 2007-8 was 24.16%, the highest figure yet, and the highest figure of all Suffolk LA's for the most recent monitoring year.

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

### **Environmental information**

#### **4.1.18 Landscape and Biodiversity**

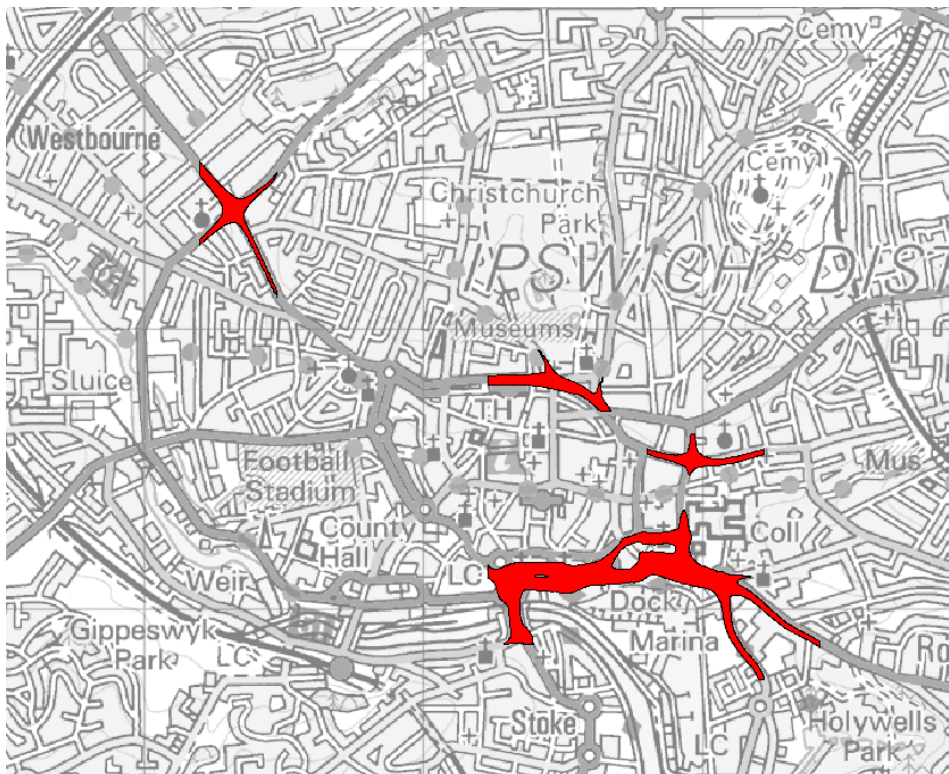
Within the Borough there are 19 County Wildlife Sites and well as two Sites of Special Scientific Interest and 17 hectares of Areas of Outstanding Natural Beauty (AONB).

#### **4.1.19 Historic and Archaeological Environment**

There are 610 listed buildings in the Borough of which 13 are Grade I. There are 14 Conservation Areas covering the historic areas of the Borough. There has been little change in the number of listed buildings in the Borough since 1995. As of 2004, 92% of all the Conservation Areas in the Borough had been the subject of character appraisals (12 out of 13), the highest percentage coverage in Suffolk.

#### **4.1.20 Water and Air Quality**

Ipswich has three AQMA's, which are shown on the map below.



In addition to these AQMA's the Local Transport Plan progress report for Suffolk highlights some emissions hotspots which are of a concern in Ipswich Borough:

#### **4.1.21 Flooding**

There were 46 Flood Watches and 9 flood warnings in Suffolk during calendar year 2008. Figures for Ipswich are not available.

#### **4.1.22 Soil Resources**

A significant way of reducing the impact on soil resources and protecting them is by concentrating new housing development on previously developed land (PDL). The percentage of completed new development on PDL in Ipswich in 2007/08 was 100%. The percentage has been consistently high since 1998/99. The Regional target of 60% (RPG6) is exceeded in Ipswich.

#### **4.1.23 Waste**

There is a general increase in the amount of household waste being recycled in Ipswich year on year since 2002/03. However, the total amount of household waste is also increasing each year. More waste is being recycled following the roll out of dry recyclables (blue bins) and garden waste (brown bin) collections in 2005/06. In 2008/09 the figure had reached 41.14% recycled or composted.

#### **4.1.24 Traffic**

Traffic volumes have steadily increased each year in Ipswich since 1999, until 2008 where levels have remained largely constant. The bulk of this increase is due to the increase in car use, especially with regard to journeys to work. However, it is important to note that Ipswich does have the highest percentage of journeys to work in Suffolk taken by sustainable modes.

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

#### **4.1.25 Climatic Effects and Climate Change**

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

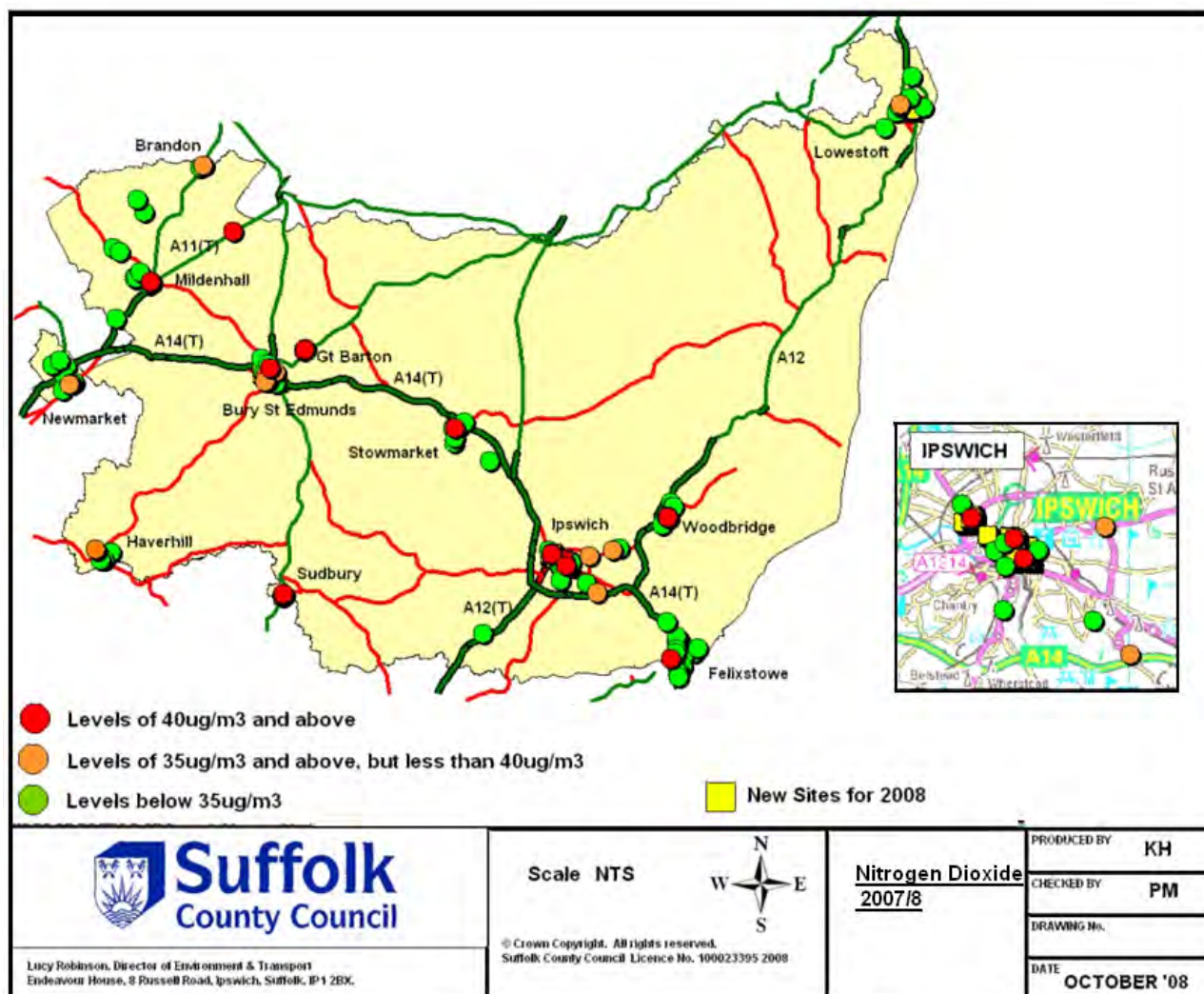
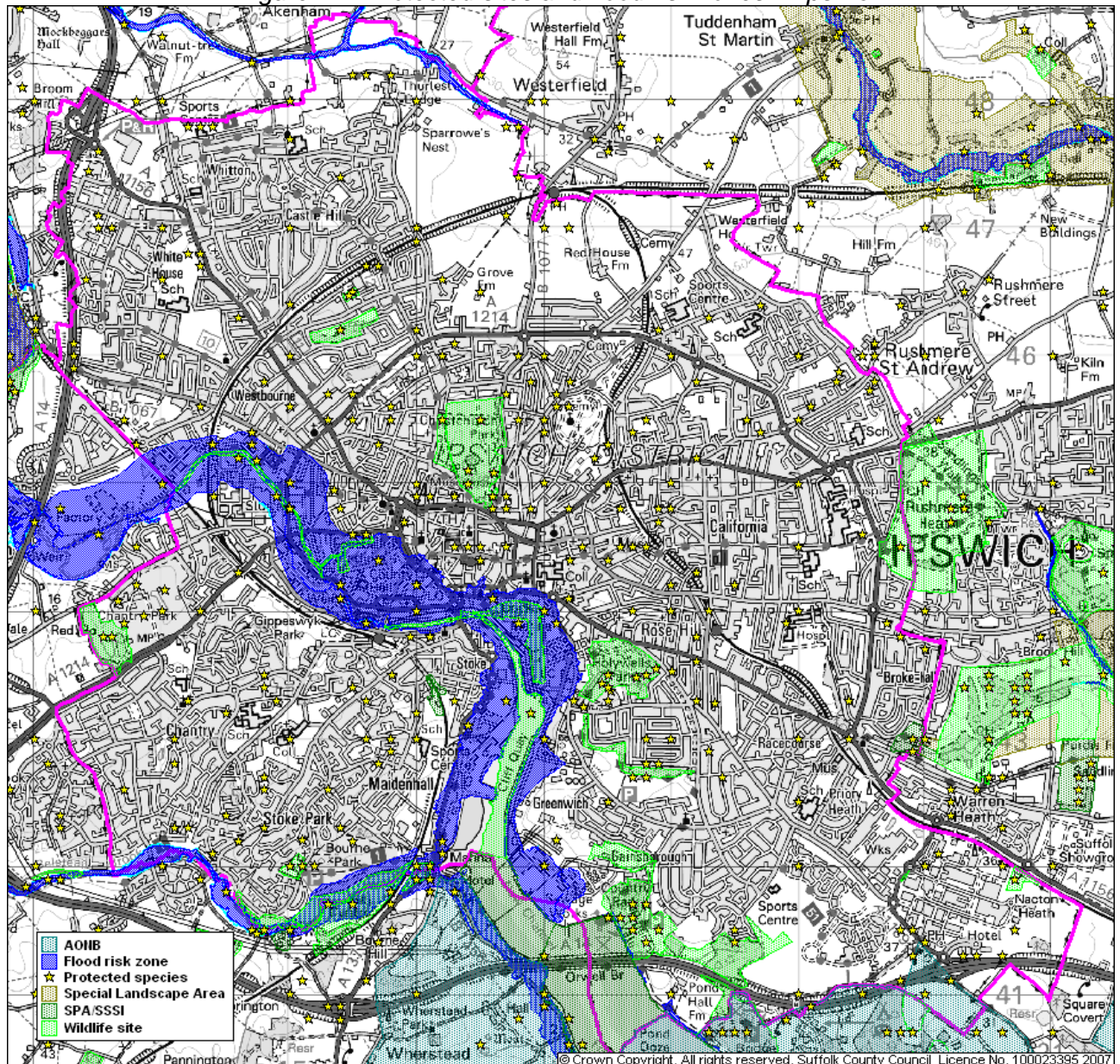
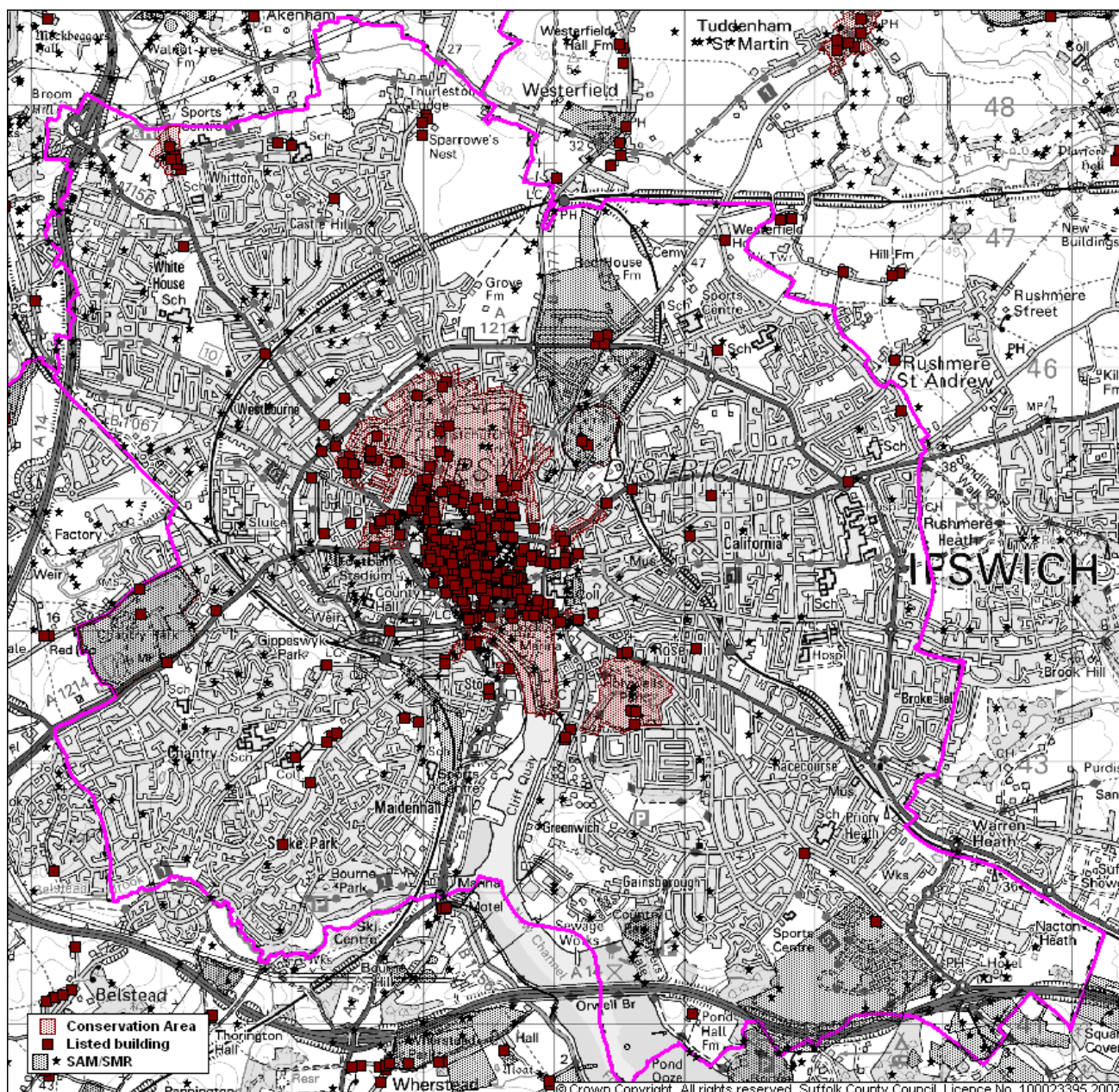




Figure 4.1: Protected sites and flood risk zones in Ipswich







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

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

## **Economic information**

### **4.1.28 Business Sectors**

The main sectors of employment in Ipswich are public administration, Finance, IT and other business, and distribution.

### **4.1.29 Business Start Ups**

The rate of business take-up can often be considered as an indicator of the vitality of a local economy. The business formation rate (as measured by VAT registrations) is the second lowest in Suffolk at 2007. The 2007 figure was 53.2, compared to a county figure of 60.6. It should be

considered however that the number of start-ups was the second highest in the county; however this is masked by the overall rate through having a high population.

#### **4.1.30 Take Up of Employment Land**

Between 2000 and 2005 the take up of employment land has been relatively static. Latest figures for 2007/8 show that 26,272m<sup>2</sup> of land was developed (and 20,757m<sup>2</sup> lost to other uses) making a net increase of 5,515m<sup>2</sup>.

#### **4.1.31 Town Centres**

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

#### **4.1.32 Transport and Travel**

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

**4.1.33** Road accident casualties in total (killed, serious and slight) have generally decreased between 2001 and 2008. Over this period around 14% of Suffolk's casualties consistently occur in Ipswich.

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

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

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

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

**4.2.2** Other new challenges with potential sustainability implications include:

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

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

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

**4.3.1.** The scoping and baseline information reports on the key issues and challenges for sustainable development in Ipswich. They are grouped into social, environmental and economic issues:

#### ***4.3.2 Social issues***

- Higher than average mortality due to respiratory disease.

- Number of homeless increasing year-on-year.
- Lack of suitable affordable housing (by type) available.
- Requirement for 15,400 new dwellings in the Borough by 2021.
- Ageing population
- Below average GCSE attainment levels

#### **4.3.3 *Environmental issues***

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

#### **4.3.4 *Economic issues***

- Need to enhance and sustain the viability and vitality of the town centre and local centres.
- Need for suitable employment land (by use) and encourage increasing new business development.
- Need for more retail floorspace.
- Requirement for 18,000 new jobs in the Borough by 2021.
- Decrease in manufacturing employment.
- Tackling impacts of recession in Ipswich, including ensuring construction and house-building do not suffer excessively

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

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

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

- Groundwater Quality
- Number of days of Air Pollution
- Accessibility To Key Services
- Level of Carbon Emissions By Cars
- Effects of Drought
- Effects of Wind Damage
- Effects of Heat
- Condition of SSSIs
- Bird Survey Results
- Condition of Key Habitats (BAPs)
- Planning Permissions Affecting Known or Potential Designated Assets
- Number of people with Type 2 Diabetes
- Provision of Open Space and Play Space
- Childcare
- Special Needs Housing (Types and Sizes)
- Comparative Industrial and Office Rental Costs Within The Borough
- Access To Adult Learning Opportunities

## 5. Sustainability objectives and criteria

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

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

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

**5.1.3** Appendix 2 contains a list of policies, plans and programmes that may influence the Ipswich Core Strategy. Table 5.1 below provides a sample summary of the documents listed in Appendix 1. The tables also give an example of the relevant links between their environmental objectives and considerations for the development of documents within the Ipswich Core Strategy. Therefore, this illustrates that when identifying new policies and proposals within the Core Strategy, these other plans and programmes will need to be considered.

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

Plan / Programme	Relationship to the LDF	Comments
<b>International</b>		
European Directives	Legislation from the European Commission regarding the protection of the environment. Translated through planning guidance and national legislation.	For example: EIA Directive, Water Framework Directive 'Habitats' Directive and the 'Birds' Directive
International UN agreements	Non-binding unilateral agreements regarding sustainability at varying levels.	For example: Rio Conference – Local Agenda 21; Kyoto; Aarhus Convention
<b>National</b>		
Planning Policy Guidance Notes and Planning Policy Statements	Government policy on various aspects of planning.	PPGs to be eventually replaced by PPSs
Government White Papers	Government statements of specific areas of policy.	For example: Transport White Paper
Planning Circulars	Guidance on specific issues that relate to planning	Various
<b>Regional</b>		
Regional Spatial Strategy (RSS) (draft)	Prepared by the East of England Regional Assembly (EERA)	Adopted in May 2009
Regional Economic Strategy	Prepared by the East of England Regional Assembly (EERA)	
Regional Transport Strategy	Prepared by the East of England Regional Assembly (EERA)	Part of RSS
Regional Sustainable Development Framework	Regional framework for sustainability in East Anglia.	Produced in 2002.
Regional Housing Strategy	Regional framework for housing.	

Plan / Programme	Relationship to the LDF	Comments
<b>Sub-Regional</b>		
Haven Gateway Employment Land Study	Breakdown of employment land demand and supply for Haven Gateway area (by district) and future needs to 2021.	Update by GVA Grimley in 2009
Haven Gateway Housing and Infrastructure Study	Assessment and analysis of future requirements for the Haven Gateway area and component districts and boroughs.	Produced by Roger Tym & Partners in 2005
Haven Gateway Regeneration Study	Assessment of regeneration needs and potential in the Haven Gateway area and component districts and boroughs.	Produced by RHK Consulting in 2005.
<b>County</b>		
Suffolk Structure Plan	County framework for development of local plans.	Produced in 2001.
Suffolk Local Transport Plan	County transport planning matters.	New LTP submitted for period 2006-2011
Suffolk Waste Core Strategy	County waste planning matters	Produced in 2008
Suffolk Replacement Minerals and Waste Local Plan	County waste and minerals planning matters.	In production. Expected to be completed 2006/07.
Suffolk Biodiversity Action Plan	County Biodiversity matters	
Suffolk Environment Action Plan	County environment matters	Produced July 2009
Suffolk Habitat Action Plan	County habitat matters.	
Suffolk Local Agenda 21 Strategy	County sustainability matters.	Produced in 2000.
<b>Local</b>		
Babergh Local Plan	Adjoining local authority.	Adopted in 2006.
Suffolk Coastal local Plan	Adjoining local authority.	Adopted in 2001.
Mid Suffolk Core Strategy	Adjoining local authority.	Adopted in 2008
<b>Ipswich Borough Council Plans, Policies &amp; Strategies</b>		
Corporate Strategy: Transforming Ipswich	Sets out the corporate goals of Ipswich Borough Council.	Produced in Summer 2005.
The Ipswich Prospectus: growth for prosperity	Sets out the future vision for Ipswich and an overview of the strategic aspirations of the borough.	Produced in September 2005
One-Ipswich Community Strategy	Sets out the borough strategy for community development.	Produced in 2008.
Adopted Ipswich Local Plan	Sets out the adopted planning policies and strategies for the borough.	Adopted in 1997.
First Deposit Draft Ipswich Local Plan	Sets out the amended and updated planning policies and strategies for the borough.	Draft document produced in 2001.
IP-One Area Action Plan	Focuses on the future development of central Ipswich	Produced as preferred options LDD in 2007 by IBC
Economic Development Strategy	Objectives for the economic development of the borough.	Relates to policy development of the regeneration of Ipswich and employment land.
Ipswich Housing Strategy / Local Housing Needs Study	The aims of the borough for the provision of housing. Study has implications on housing supply issues.	Housing Needs Study produced in 2005.
Ipswich Retail Study	Sets out retailing demand and supply issues and forecasts capacity for Ipswich to 2016.	Produced by DTZ Peda for Ipswich Borough Council in August 2005.
Cultural Strategy	Sets out the borough council's strategy with regards to culture.	Produced 2005.
Environmental Strategy	Sets out the borough council's strategy for enhancing and managing environmental quality.	Produced July 2007.



## 5.2 How and why the SA objectives were adopted

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

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

**5.2.2** Many of the indicators chosen come from within Ipswich Borough Council and the work of the Suffolk Sustainability Appraisal Group (SSAG), a multi-agency group including all the Suffolk Local Authorities. The indicators cover environmental, social and economic issues. For local purposes, the objectives have been grouped into themes that reflect those set out in the *One-Ipswich Community Plan 2005*, namely:

- Everyone should have a decent roof over their head
- People enjoy good health
- There is work for all
- Create a better environment for people in Ipswich
- People keep safe

**5.2.3** Although the latest (2008-10) version of the community strategy has updated these themes, the outcomes correspond with those listed above.

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

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

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

**5.3.1** The sustainability objectives and key indicators that form the Sustainability framework listed in Table 5.3 were defined in the Scoping Report. The SA framework used in this appraisal is included in Appendix 2.

*Table 5.3: SA Objectives*

ET1. To improve water and air quality
ET2. To conserve soil resources and quality
ET3. To reduce waste
ET4. To reduce the effects of traffic upon the environment
ET5. To improve access to key services for all sectors of the population
ET6. To reduce contributions to climate change
ET7. To reduce vulnerability to climatic events and increasing sea levels
ET8. To conserve and enhance biodiversity
ET9. To conserve and where appropriate enhance areas and sites of historical importance
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs
HW1. To improve the health of those most in need
HW2. To improve the quality of life where people live and encourage community participation
ER1. To reduce poverty and social exclusion
ER2. To offer everybody the opportunity for rewarding and satisfying employment
ER3. To help meet the housing requirements for the whole community
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area
ER5. To revitalise town centres
ER6. To encourage efficient patterns of movement in support of economic growth

ER7. To encourage and accommodate both indigenous and inward investment
CL1. To maintain and improve access to education and skills for both young people and adults
CD1. To minimise potential opportunities for crime and anti-social activity

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

## 5.4 Compatibility of SA Framework

**5.4.1** The compatibility of all the objectives in the SA framework has been tested, as shown in table 5.4.

**5.4.2** Clearly there are incompatibilities between social objectives to offer everyone rewarding employment and meet housing needs and environmental objectives and between all the economic objectives and the environmental objectives. A balance between needs to be struck in these circumstances and this is where mitigation actions may be appropriate.

*Table 5.4: Compatibility of SA Objectives*

	ET1	ET2	ET3	ET4	ET5	ET6	ET7	ET8	ET9	ET10	ET11	HW1	HW2	ER1	ER2	ER3	ER4	ER5	ER6	ER7	CL1	CD1
ET1. To improve water and air quality																						
ET2. To conserve soil resources and quality																						
ET3. To reduce waste																						
ET4. To reduce the effects of traffic upon the environment		0	0																			
ET5. To improve access to key services for all sectors of the population	?	0	0	X																		
ET6. To reduce contributions to climate change		?			X																	
ET7. To reduce vulnerability to climatic events and increasing sea levels		?			?																	
ET8. To conserve and enhance biodiversity					?																	
ET9. To conserve and where appropriate enhance areas and sites of historical importance	0	0	0	?	X	0	?															
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0		0	0	x	0	?															
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs					?																	
HW1. To improve the health of those most in need		0	0	x		?	0	0	0	0	0											
HW2. To improve the quality of life where people live and encourage community participation		0		0		0	0	0			0											
ER1. To reduce poverty and social exclusion	0	0	0	0		0	0	0	0	0	0											
ER2. To offer everybody the opportunity for rewarding and satisfying employment	0	0	0	0		0	0	0	0	0	0											
ER3. To help meet the housing requirements for the whole community	0	0	0	0		0	?	X	0	0	X	0			0							
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	0	0	0	0		0	0	0	0	0	0											
ER5. To revitalise town centres	0	0	0	0		0	0	0	0		0	0		0								
ER6. To encourage efficient patterns of movement in support of economic growth	X	0	0				0	0	0	X	0	0										
ER7. To encourage and accommodate both indigenous and inward investment	0	0	0	0		0	0	0	X		0											
CL1. To maintain and improve access to education and skills for both young people and adults	0	0	0	0		0	0	0	0	0	0	0						0	0			
CD1. To minimise potential opportunities for crime and anti-social activity	0	0	0	0	0	0	0	0	0	0	0	0			0				0		0	

## 6. MAIN OBJECTIVES OF THE PLAN

### 6.1 Statutory purpose

In formal terms this Core Strategy and Policies Development Plan Document is intended to fulfil the requirements of the third stage of the five stage Local Development Framework production process (i.e. the Regulation 27 stage under the 2008 amendments to the Town and Country Planning Act (Local Development) (England) Regulations 2004).

### 6.2 Links with national policy

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

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

The links to the regional spatial strategy and the Ipswich Community Strategy are described in the LDD.

### 6.4 Outline of content

**6.4.1** The Core Strategy DPD produced in July 2009 sets out an overall vision for Ipswich Borough to 2025:

*“Our Vision is to improve the quality of life for all who live in, work in, learn in and visit Ipswich, by supporting growth and ensuring that development happens in a sustainable manner so that the amenities enjoyed by local people are not harmed and the town is enhanced.*

*As a result, by 2025 Ipswich will be a more vibrant, active and attractive modern county town – a true focus for Suffolk and beyond. It will be a place where people aspire to live, work, learn, visit and invest – and it will have a reduced carbon footprint”*

**6.4.2** This vision is supported by 10 points, which underpin the overarching vision:

- 1. There will be more people living and working in Ipswich town centre, which will be the focus for much of the new development.*
- 2. People will enjoy an extended and improved shopping centre that includes new stores on allocated sites, providing greater choice than at present, and improved cultural and sporting opportunities within the wider centre.*
- 3. Pedestrian links between the central shopping area and the Waterfront, Village, Education Quarter and railway station will be direct, attractive, safe and well signed.*
- 4. Pedestrians, cyclists and public transport users will come first in Ipswich town centre. Traffic management measures in conjunction with improvements for pedestrians, cyclists and buses will ensure effective links between the wider Ipswich area and the town centre, and help keep congestion down and accessibility easy in the centre.*
- 5. The distinctive network of stunning parks and open water will be enhanced by the completion of the river path, and additional tree planting and landscaping in new developments and on the streets.*
- 6. As well as the concentration of jobs in the town centre, there will be new employment development at sites around the Borough including a strategic employment site at Cranes,*



*together with the continued development of existing employment areas distributed across the town.*

- 7. University Campus Suffolk will have progressed through phase 3 of its planned growth, to complete the new campus at the Waterfront and the adjacent Education Quarter.*
- 8. The town's health will be cared for through strategic health services brought together at the Heath Road Hospital site and a strong network of local surgeries and health centres, including replacement or additional provision for Lattice Barn, Woodbridge Road and Deben Road surgeries.*
- 9. In the latter part of the plan period, land will start to come forward for development at Ipswich's Northern Fringe, in conjunction with highway, water, energy, education, green and health infrastructure. Express bus services and pedestrian and cycle routes will connect the area to the town centre with a journey time of a few minutes.*
- 10. Outside central Ipswich, thriving district and local centres will provide local shopping and services close to people's homes and will be surrounded by strong and cohesive communities.*

**6.4.3** These are then filtered down to twelve plan objectives related to development within the borough. These are as follows:

- 1) High standards of design will be required in new development. Development must be sustainable, environmentally friendly and resilient to the effects of climate change. Standards of acceptability will be raised progressively from 2006 (Building Regulations) levels for all developments in the town in terms of design and environmental performance;
- 2) Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.
- 3) At least (a) 15,400 new dwelling units shall be provided between 2001 and 2021 (18,480 to 2025) in a manner that addresses identified local housing needs and provides a decent home for everyone, with at least 70% of them being on previously developed land and at least 35% of them being affordable homes; and (b) 18,000 additional jobs shall be provided in Ipswich between 2001 and 2025.
- 4) The development of the Borough should be focussed primarily within the central Ipswich "IP-One" area and within and adjacent to identified district centres (these areas are identified on the key diagram);
- 5) Opportunities shall be provided to improve strategic facilities in Ipswich by:
  - Significantly enhancing the town centre in terms of the quantity and quality of the shops, the cultural offer and the network of public spaces;
  - Ensuring a new strategic employment site is developed in the Ipswich area by 2021;
  - Extending the strategic greenspace network; and
  - Continuing to support the development of University Campus Suffolk and Suffolk New College.
- 6) To improve accessibility to and the convenience of all forms of transport, and achieve significant modal shift from the car to more sustainable modes through the Ipswich Major Scheme

and other local initiatives. This will: (a) promote choice and better health; (b) facilitate sustainable growth, development and regeneration; and, (c) improve integration, accessibility and connectivity. Specifically:

- Significant improvements should take place to the accessibility to and between the three key nodes of: the railway station (including the wider Ipswich Village environment), the Waterfront (and particularly the education quarter) and the Central Shopping Area;
- Additional east-west highway capacity should be provided within the plan period in the Ipswich area to meet the needs of the wider population and to provide the potential to reallocate some central road space; and
- Ipswich Borough Council aspires to an enhanced public transport system, such as guided bus, urban light railway, trams or monorail.

7) Enhanced flood protection including a tidal surge barrier should be in place to protect the town's existing and expanding communities from the threat of tidal flooding;

8) To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use, and protect the historic buildings and character of Ipswich;

9) To retain and provide high quality schools, health facilities, sports and cultural facilities and other key elements of community infrastructure in locations accessible by sustainable means and in time to meet the demands put on such services from the town's growth and ageing population;

10) To tackle deprivation and inequalities across the town;

11) To create a safer and more cohesive town.

12) To work with other local authorities in the Ipswich Policy and with LSP partners to ensure a co-ordinated approach to planning and development.

## 6.5 Consultations carried out

Consultation on the Issues and Options for the proposed DPD was undertaken in January and February 2005, June and July 2006 and March 2007. The Preferred Options document was then consulted on between January and February 2008, along with the Ip-One Area Action Plan, Site Specific Allocations and accompanying sustainability appraisal. The results of this consultation have been taken into account in this appraisal.

## 6.6 Compatibility of plan objectives with SA objectives

**6.6.1** As part of the SA, it is necessary to assess the compatibility of the 12 core strategy objectives against the 22 SA objectives listed in Table 5.3. The result of this assessment can be seen in Table 6.7. Positive correlation is represented by a ✓, negative correlation with an X, uncertain correlations with ? and cases with no apparent effect on each other by a 0. Brief reasons for the scores are given.

*Table 6.6: Overall scores of the plan objectives measured against the SA objectives*

<b>Core Strategy Objectives</b>	<b>✓</b>	<b>0</b>	<b>X</b>	<b>?</b>
1. Sustainable development	18	0	0	0
2. Lower carbon emissions	8	0	0	0
3. Housing, PDL and jobs	9	0	5	0
4. Development locations	5	0	0	0
5. Strategic facilities	16	0	0	0
6. Transport	9	0	0	3
7. Flooding	5	0	0	0

8. Community facilities and open space	8	0	0	0
9. Key public services	8	0	0	0
10. Deprivation	7	0	0	0
11. Cohesion	3	0	0	0
12. Partnership working	12	0	0	0
<b>Total</b>	<b>108</b>	<b>0</b>	<b>5</b>	<b>3</b>

**6.6.2** The appraisal of the core strategy objectives showed them to be overwhelmingly positive, with 108 positive correlations and only five negatives. A further three correlations were uncertain. All twelve objectives had a positive score overall; though in only four cases (objectives 1, 3, 5 and 12) did positives outnumber neutrals.

**6.6.3** All five negative correlations fell under objective 3, which dealt with the development of new housing and new employment sites. Although this level of development is prescribed by the RSS, there were concerns that it is incompatible with reducing traffic, improving air quality, reducing waste and energy consumption, and conserving biodiversity by building on PDL (it is assumed PDL may have a higher biodiversity potential than greenfield agricultural monoculture).

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

**6.6.5** It should also be noted that the references to the Haven Gateway Green Infrastructure Study boost policies by adding a consideration for incorporating open and leisure space into development.

**6.6.6** The three uncertain correlations were all on objective 6, transport. These all related to possible increases in traffic, and its effects (worsening air quality). This is because the objective voiced support for both improvements to sustainable transport and an increase in road capacity. Thus whilst boosting public transport (which would be a positive correlation), it would also increase road traffic (a negative). In turn, these cancel each other out, resulting in a stalemate. It should however also be noted that there is potential for secondary effects in that increased road transport may alleviate congestion in some areas.

**6.6.7** This issue is mitigated to some extent by clearly stating support for improving public transport. The text could however directly refer to cycling and walking facilities around the town centre.

*Table 6.7: Comparison of the Core Strategy objectives with the SA objectives*

	1. Sustainable development and environmental performance	2. Lower carbon emissions	3. Housing, PDL and jobs	4. Development locations	5. Strategic facilities	6. Transport	7. Flooding	8. Community facilities & open spaces	9. Key public services	10. Deprivation	11. Cohesion	12. Partnership working
<b>ET1. To improve water and air quality</b>	✓ Seeks environmentally friendly development		X More housing and jobs may increase traffic	✓ Aims for development around district shopping areas	✓ Seeks environmentally friendly development (Green Infrastructure)	? Aims to improve public transport, but also increases road capacity		✓ Seeks environmentally friendly development (Green Infrastructure)	✓ Aims to locate key services in sustainably accessible areas			
<b>ET2. To conserve soil resources and quality</b>	✓ Seeks high standards of sustainable development		✓ Aims for at least 90% use of PDL		✓ New strategic employment site is on PDL			✓ Seeks environmentally friendly development (Green Infrastructure)				
<b>ET3. To reduce waste</b>	✓ Seeks high standards of sustainable development		X New housing & development may mean more waste		✓ Seeks environmentally friendly development (Green Infrastructure)							
<b>ET4. To reduce the effects of traffic upon the environment</b>	✓ Seeks environmentally friendly development		X More housing and jobs may increase traffic	✓ Aims for development around district shopping areas		? Aims to improve public transport, but also increases road capacity			✓ Aims to locate key services in sustainably accessible areas			✓ Co-ordinated approach to development
<b>ET5. To improve access to key services for all sectors of the population</b>	✓ Seeks sustainable development		✓ Key services available throughout town	✓ Aims for development around district shopping areas		✓ Aims to improve accessibility			✓ Addresses ageing populations needs	✓ Addressed deprivation, would include service deprivation		
<b>ET6. To reduce contributions to climate change</b>	✓ Seeks high standards of sustainable development	✓ Seeks to reduce carbon emissions	X More housing & employment may mean more emissions		✓ Seeks environmentally friendly development (Green Infrastructure)							
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	✓ Seeks high standards of sustainable development	✓ Reducing CO <sub>2</sub> emissions will help reduce sea level rise			✓ Seeks environmentally friendly development (Green Infrastructure)		✓ Aims to protect the town from flooding					

	1. Sustainable development and environmental performance	2. Lower carbon emissions	3. Housing, PDL and jobs	4. Development locations	5. Strategic facilities	6. Transport	7. Flooding	8. Community facilities & open spaces	9. Key public services	10. Deprivation	11. Cohesion	12. Partnership working
<b>ET8. To conserve and enhance biodiversity</b>	✓ Seeks environmentally friendly development		X Building on PDL may damage biodiversity					✓ Aims to provide open spaces				✓ Co-ordinated approach to development
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	✓ Seeks environmentally friendly development		✓ Building on PDL may help conserve areas of importance		✓ Seeks environmentally friendly development (Green Infrastructure)							✓ Co-ordinated approach to development
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	✓ Seeks environmentally friendly development		✓ Building on PDL may help preserve local townscape		✓ Seeks environmentally friendly development (Green Infrastructure)			✓ Seeks environmentally friendly development (Green Infrastructure)				✓ Co-ordinated approach to development
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	✓ Seeks environmentally friendly development				✓ Seeks environmentally friendly development (Green Infrastructure)			✓ Seeks environmentally friendly development (Green Infrastructure)				✓ Co-ordinated approach to development
<b>HW1. To improve the health of those most in need</b>	✓ Seeks environmentally friendly development				✓ Seeks environmentally friendly development (Green Infrastructure)	✓ Aims to promote better health		✓ Aims to provide accessible open spaces	✓ Aims to ensure that health facilities meet demands	✓ Addressed deprivation, would include health deprivation		

	1. Sustainable development and environmental performance	2. Lower carbon emissions	3. Housing, PDL and jobs	4. Development locations	5. Strategic facilities	6. Transport	7. Flooding	8. Community facilities & open spaces	9. Key public services	10. Deprivation	11. Cohesion	12. Partnership working
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	✓ Seeks environmentally friendly development				✓ Seeks to improve cultural offer	✓ Promotes choice of mobility		✓ Aims to provide accessible open spaces	✓ Aims to provide key facilities in accessible location	✓ Addressed deprivation	✓ Addressed cohesion and inclusion	
<b>ER1. To reduce poverty and social exclusion</b>			✓ Aims for 18,000 new jobs		✓ Aims for a new strategic employment site	✓ Promotes choice of mobility		✓ Aims to provide quality community facilities	✓ Aims to provide key facilities in accessible location	✓ Addressed deprivation	✓ Addressed cohesion and inclusion	
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	✓ Development should be sustainable	✓ Development should result in lower CO <sub>2</sub> emissions	✓ Aims for 18,000 new jobs		✓ Aims for a new strategic employment site					✓ Addressed deprivation, would include work deprivation		✓ Co-ordinated approach to development
<b>ER3. To help meet the housing requirements for the whole community</b>	✓ Development should be sustainable	✓ Development should result in lower CO <sub>2</sub> emissions	✓ Aims for 15,400 new dwellings (35% affordable)			✓ Aims to facilitate sustainable growth	✓ Flood protection will facilitate release of sites					✓ Co-ordinated approach to development
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	✓ Development should be sustainable	✓ Development should result in lower CO <sub>2</sub> emissions	✓ Aims for 18,000 new jobs		✓ Aims for a new strategic employment site	✓ Aims to facilitate sustainable growth	✓ Flood protection will facilitate release of sites					✓ Co-ordinated approach to development
<b>ER5. To revitalise town centres</b>	✓ Development should be sustainable	✓ Development should result in lower CO <sub>2</sub> emissions	✓ New residents will boost town centre	✓ Aims to revitalise town centre	✓ Aims to revitalise town centre	✓ Improves integration accessibility and connectivity	✓ Flood protection will facilitate site redevelopment					✓ Co-ordinated approach to development

	1. Sustainable development and environmental performance	2. Lower carbon emissions	3. Housing, PDL and jobs	4. Development locations	5. Strategic facilities	6. Transport	7. Flooding	8. Community facilities & open spaces	9. Key public services	10. Deprivation	11. Cohesion	12. Partnership working
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	✓ Seeks high standards of sustainable development	✓ Development should result in lower CO <sub>2</sub> emissions		✓ Aims for development around district shopping areas		? Aims to improve public transport, but also increases road capacity			✓ Aims to locate key services in sustainably accessible areas			✓ Co-ordinated approach to development
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>					✓ Aims for a new strategic employment site	✓ Aims to facilitate regeneration	✓ Flood protection will facilitate release of sites					✓ Co-ordinated approach to development
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>		✓ Development should result in lower CO <sub>2</sub> emissions			✓ Aims to support the development of UCS and Suffolk New College	✓ Aims to improve access to education quarter			✓ Aims to ensure that schools meet demands put upon them	✓ Addressed deprivation, would include education deprivation		✓ Co-ordinated approach to development
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>								✓ Aims to provide quality community facilities		✓ Addressed deprivation, should alleviate crime	✓ Addressed safety	

## **7. POLICIES AND ALTERNATIVES**

### **7.1 Policies and options considered**

The core strategy lays out 53 policies, of which 33 are related to development control. There are no alternatives considered, however for the purposes of strategic environmental assessment, non-implementation will be considered an alternative policy. This section sets out the policies appraised.

#### **Policy CS1: Sustainable Development – Climate Change**

In Ipswich a comprehensive approach will be taken to tackling climate change and its implications through:

- a. Requiring all new development to incorporate energy conservation and efficiency measures, to achieve significantly reduced carbon emissions by 2016 for all new residential and major non-residential development;
- b. Requiring all major developments to achieve a target of at least 15% of their energy requirements to be provided through decentralised renewable or low carbon energy sources;
- c. Seeking opportunities to develop renewable energy generating capacity including on Council-owned land;
- d. Supporting the Suffolk Climate Change Partnership and other appropriate local carbon reduction schemes;
- e. Implementing the IMPACT Carbon Management scheme and reducing carbon emissions from the Council's own operations by 30% by 2013 and 50% by 2021 from a 2007/08 baseline;
- f. Supporting the implementation of the Ipswich Flood Defence Strategy by the Environment Agency; and
- g. Requiring building and infrastructure design to incorporate water conservation, capture, recycling and efficiency measures and sustainable urban drainage systems. (SUDs)

#### **Policy CS2: The Location and Nature of Development**

The regeneration and sustainable growth of Ipswich will be achieved through:

- a. Focusing most new residential development and community facilities into the town centre, the Waterfront and Ipswich Village, and into or within walking distance of the town's district centres;
- b. Focusing major new retail development into the Central Shopping Area;
- c. Focusing new office, hotel, cultural and leisure development into Ipswich town centre;
- d. Promoting a strategic employment site at Cranes, Nacton Road, to support growth in the ICT and other related and creative arts sectors;
- e. Directing other employment uses (B1 except office, B2 and B8) to employment areas distributed in the outer parts of the Borough; and
- f. Dispersing open space based (non-commercial) leisure uses throughout the town.
- g. Development demonstrating principles of high quality architecture and urban design.

In addition to the above locations, a sustainable urban extension to north Ipswich may be permissible subject to the prior provision of suitable infrastructure (see Policy CS10).

Major developments within the town centre, Ipswich Village, and district centres should incorporate a mix of uses to help achieve integrated, vibrant and sustainable communities. Major developments are defined as commercial developments of 1000m<sup>2</sup> or more or residential developments of 10 units or more. The mix will consist of at least two uses, with the lesser use consisting of at least 20% of net floorspace. Exceptions may be made for large offices or education buildings for a known end user.



Development densities will be high in the town centre, Ipswich Village and Waterfront, medium in and around the district centres, and low elsewhere.

#### **Policy CS3 IP-One Area Action Plan**

The Council will prepare and implement an IP-One Area Action Plan to plan for significant change in central Ipswich. The Area Action Plan will:

- a. Define the extent of the town centre, Waterfront and Ipswich Village;
- b. Allocate sites for development in IP-One, including land to provide approximately 2,000 dwellings;
- c. Set down development principles to apply in identified opportunity areas where change will be concentrated;
- d. Define the Central Shopping Area and primary, secondary and speciality shopping frontages;
- e. Define and safeguard the Education Quarter to support the delivery of Phase 3 of the development of University Campus Suffolk;
- f. Define conservation areas within its boundary, including the Central and Wet Dock Conservation Areas, which will be protected and enhanced;
- g. Identify where new community facilities and open space should be provided within IP-One; and
- h. Provide a framework for the delivery of regeneration in IP-One.

#### **Policy CS4 Protecting Our Assets**

The Council is committed to protecting and enhancing the Borough's built, historical, natural and geological assets.

The Council will protect and enhance the character and appearance of conservation areas, by preparing character appraisals and using them to guide decisions about development.

The Council will also seek to conserve and enhance local biodiversity in accordance with Planning Policy Statement 9, national legislation, and through:

- a. Requiring new development to incorporate provision for conserving and enhancing local biodiversity and geodiversity interests;
- b. Supporting the Greenways Project;
- c. Designating additional Local Nature Reserves where appropriate; and
- d. Preparing and implementing management plans for Council owned wildlife sites.

The Council will encourage the use of local reclaimed, renewable, recycled and low environmental impact materials in construction, in order to conserve finite natural resources and minimise environmental impacts. New development will also be required to minimise the amount of waste generated during construction and through the lifetime of the building.

#### **Policy CS5 Improving Accessibility**

Development should be located and designed to minimise the need to travel and to enable access safely and conveniently on foot, by bicycle and by public transport. This will encourage greater use of these modes. The Council will support the implementation of the Ipswich Major Scheme and will work with the Highway Authority to manage travel demand in Ipswich.

#### **Policy CS6 The Ipswich Policy**

Ipswich Borough Council recognises the importance of joint working and the coordination of planning policies around the fringes of Ipswich, in order to deliver appropriate development. It will achieve this in a variety of ways:

- i. Formal working through the Ipswich Policy Board;

- ii. Joint working on LDF evidence gathering, monitoring and updating, to ensure a consistent approach; and
- iii. Joint working through the Haven Gateway Partnership to develop shared approaches, such as that for strategic green infrastructure.

The preparation of joint development plan documents is not proposed at present, but will be reconsidered as part of the review of this Core Strategy.

#### **Policy CS7 The Amount of New Housing**

The Council will allocate land to provide for at least an additional 4,983 dwellings net to be provided in the Borough by 2021. Sites will be identified through the IP-One Area Action Plan and the Site Allocations and Policies Development Plan Document in accordance with the spatial strategy in this Core Strategy. Housing allocations will be made and released in two phases:

Phase 1: 2010 to 2015 (5 years)

Phase 2: 2015 to 2021 (6 years)

#### **Policy CS8 The Balance Between Flats and Houses**

The Council will plan for a mix of dwelling types to be provided, in order to achieve mixed and sustainable communities. All major schemes over 10 dwellings will be expected to provide a mix of dwelling types and sizes.

Exceptions to this approach will only be considered where:

- a. The site location, characteristics or sustainable design justify a different approach; or
- b. A different approach is demonstrated to better meet housing needs in the area; or
- c. A different approach would expedite the delivery of housing needed to meet targets and is acceptable in other planning terms; and the approach would not prejudice the five year housing land supply.

#### **Policy CS9 – PDL Target**

From 2010 to 2021, at least 70% of development will take place on previously developed land. This reflects the locational strategy set out in Policy CS2, which focuses development primarily into central Ipswich. It will in turn be reflected in site allocations made in the IP-One Area Action Plan and Site Allocations and Policies development plan document.

#### **Policy CS10 – Ipswich Northern Fringe**

Land at the Northern Fringe of Ipswich, north of Valley Road/Colchester Road and between Henley Road in the west and Tuddenham Road in the east, will form the main source of supply of housing land in Ipswich after 2021. The precise number of dwellings required will be determined by the review of the Regional Spatial Strategy.

However, due to the limited availability of previously developed land in the rest of the town, the delivery of up to 1,000 of those dwellings will be expected to commence during the plan's second phase on land to the east of Henley Road and south of the railway line. The Site will be identified through the Site Allocations and Policies document. The new Regional Spatial Strategy that will allocate housing numbers to 2031 will have an impact on the scale of any required development in the Northern Fringe. A prerequisite for any development being granted planning permission in the Northern Fringe will be the prior adoption by the Council of a supplementary planning document providing a development brief to:

- a. guide the development of the whole area; and
- b. identify the infrastructure that developments will need to deliver alongside new housing, and
- c. set out a schedule of infrastructure charges.

The Borough Council will start to prepare the supplementary planning document after the new Regional Spatial Strategy is adopted, as it will only be then when there will be clarity around the number of houses to be planned for in the Northern Fringe area.

Any development will maintain an appropriate physical separation of Westerfield Village from Ipswich and include green walking and cycling links to Westerfield Station.

Should housing delivery on previously developed land sites at 2015 be falling significantly short of requirements, the Council would at that time need to consider allowing additional land in the Northern Fringe to be released for development prior to 2021.

### **Policy CS11 Gypsies and Travellers**

The Council will work with neighbouring authorities to identify and deliver additional permanent sites for Gypsies and Travellers in the wider Ipswich area, where need is proved.

Sites for additional Gypsy and Traveller sites will need to comply with the following criteria:

- a. The site should be located:
  - i. Close to the trunk road network, and
  - ii. Within 1km of basic services including the public transport network.
- b. The site should be:
  - i. Accessible safely on foot, by cycle and by vehicle
  - ii. Large enough to allow business activities to be carried out
  - iii. Free from flood risk and significant contamination
  - iv. Safe and free from pollution
  - v. Capable of being cost effectively drained and serviced, including waste disposal and recycling facilities.
  - vi. Proportionate in size to any nearby settlements, to support community cohesion; and
  - vii. Where possible, located on previously developed land.
- c. The site should not impact adversely on:
  - i. The residential amenity of immediate or close neighbours;
  - ii. The appearance and character of the open countryside or conservation areas;
  - iii. Sites designated to protect their nature conservation, geological, historic or landscape qualities; and
  - iv. The physical and social infrastructure of local settlements.

Site identification will be carried out in consultation with the Gypsy and Traveller and settled communities. Site size and design will be in accordance with government guidance.

If site allocations through the Local Development Framework are needed within Ipswich up to 2021, they will be progressed through the Site Allocations and Policies development plan document or the IP-One Area Action Plan.

In line with Regional Spatial Strategy, the Council will work with Suffolk County Council and neighbouring authorities to develop the South Suffolk transit site between Ipswich and Felixstowe.

The needs of travelling showpeople will be kept under review.

### **Policy CS12 Affordable Housing**

The Council will work with partners to provide affordable housing to meet identified needs in Ipswich. All new developments of 10 dwellings or more (or on housing sites of 0.3ha or more) are required to include provision for affordable housing as follows:

- a. 35% affordable housing provision in schemes of 15 or more dwellings or 0.5ha or more; and
- b. 20% affordable housing provision in schemes of between 10 and 14 dwellings or 0.3 to 0.49 ha.

At least 70% of affordable housing provision should consist of social rented housing.

### **Policy CS13 Planning for Jobs Growth**

The Council will promote sustainable economic growth in Ipswich. It will encourage the provision of at least 18,000 jobs between 2001 and 2025 by:

- a. Allocating at least 30ha of land for employment development (in Use Classes B1, B2 and B8) through the IP-One Area Action Plan and Site Allocations and Policies development plan documents;
- b. Protecting for employment uses existing employment areas, which will be identified through the IP-One Area Action Plan and Site Allocations and Policies development plan documents and on the proposals map;
- c. Allocating land for other employment-generating uses including education development and leisure development, through the IP-One Area Action Plan and Site Allocations and Policies documents;
- d. Allocating 16.7ha of land at the site of the former Cranes factory at Nacton Road as a strategic employment site, with the principal access taken from Ransomes Way. The site will be safeguarded for B1, B2 and B8 uses. Sui generis employment uses will only be permitted if they support Ipswich's regeneration or the growth of key sectors such as the creative arts or ICT;
- e. Supporting the growth of University Campus Suffolk and Suffolk New College in order to raise skills and qualifications levels in the workforce; and
- f. Working with partners to ensure that coordinated action is taken to encourage sustainable economic growth, including direct intervention where necessary.

### **Policy CS14 Retail Development**

The Council will promote high quality investment and development in Ipswich Central Shopping Area, to maintain and enhance its attraction and market share, and strengthen its regional role.

Through the IP-One Area Action Plan, the Council will extend the Central Shopping Area and allocate sites for retail development within it. This will enable the delivery of approximately 35,000 sq m net of additional floorspace to diversify and improve the retail offer. The Council will also limit the size of shops permissible at the Waterfront.

Major retail development in edge of centre or out of centre locations will be considered in light of national policy and the Council's aim to enhance the role, vitality and viability of Ipswich Central Shopping Area.

The Council will direct other town centre uses including offices, leisure and hotel developments into an extended town centre area, in recognition of the area's good accessibility by public transport, cycle and foot.

The Council will also promote environmental enhancements to the town centre and improved public transport accessibility.

In the district centres and local centres, the Council will permit retail development of a scale appropriate to their size, function and catchment

### **Policy CS15 Education Provision**

The Council will continue to support the development of educational facilities at Suffolk New College and University Campus Suffolk. Land for the further development of these facilities,

specifically the existing campus site and Phase 3 of the University scheme of development, will be identified and safeguarded for education use through the IP-One Area Action Plan.

The Council also supports the development of a new 14-19 centre outside the Borough at Copdock, to serve the western half of Ipswich, as well as large parts of South Suffolk.

The Council supports the upgrading of education facilities through the Building Schools for the Future programme and will seek to ensure that community access to school facilities is maximised. Should school facilities become redundant, any application for a non-community use will need to be supported by evidence that the facility and site is no longer needed for community uses.

New primary schools will be needed to meet the demands of growth. Sites for new primary schools in both east and west Ipswich will be identified through the IP-One Area Action Plan and/or Site Allocations and Policies document.

Any additional nursery and children's centre provision will be encouraged to locate within or adjacent to District and Local Centres in order to facilitate linked trips by parents. The sustainable location of such facilities so that they are accessible by walking, cycling or public transport will be a requirement.

Any education needs associated with development at the Northern Fringe will be identified and sites safeguarded through the development brief to be prepared as a supplementary planning document.

#### **Policy CS16 Green Infrastructure, Sport and Recreation**

The Council will protect, enhance and extend the network of green corridors, open spaces, sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk. It will do this by:

- a. Requiring all developments to contribute to the provision of open space according to the Borough's standards, identified strategic needs and existing deficits or surpluses in an area;
- b. Requiring major new developments to include on site green spaces that where possible create a network with existing provision;
- c. Supporting proposals or activities that protect, enhance or extend open spaces and sport and recreation facilities;
- d. Working with partners to prepare and implement management plans for green spaces;
- e. Supporting the Greenways Project in working with communities and volunteers to manage green corridors in Ipswich;
- f. Working with partners to improve green infrastructure provision and link radial green corridors with a publicly accessible green rim around Ipswich;
- g. Seeking to work with partners to provide a new country park in the urban fringe of north eastern Ipswich and put in place plans to manage visitors to the countryside close to the Orwell Estuary;
- h. Promoting improved access to existing facilities where appropriate, e.g. through Building Schools for the Future; and
- i. Reviewing the town's estate of sports facilities to consider how they can best meet the needs of a growing population.

The IP-One Area Action Plan and Site Allocations and Policies development plan document will identify open spaces, sport and recreation facilities and green corridors.

#### **Policy CS17 Delivering Infrastructure**

The Council will require all developments to meet the on and off site infrastructure requirements needed to support the development and mitigate the impact of the development on the existing community and environment.

Where the provision of new, or the improvement or extension of existing off-site infrastructure is needed to support a new development or mitigate its impacts, each development will be required to contribute proportionately through a standard charge.

A supplementary planning document will be prepared that sets out:

- The level and types of charges to be included within the standard charge;
- How the figures have been calculated;
- Which types of development would be expected to contribute to each category of infrastructure; and
- A detailed infrastructure strategy and delivery plan.

Each development will be expected to meet site related infrastructure needs outside the standard charge approach. Affordable housing and on-site open space provision will continue to be dealt with through planning obligations.

The standard charge will apply to all developments but may be varied according to:

- a. The scale and nature of the development and its demonstrated viability, and
- b. Whether on site provision of infrastructure meets the needs of the development and/or the needs of a wider area beyond the site itself.

Agreed charges will be secured through a Section 106 Agreement.

The broad categories of infrastructure to be included in the standard charge are as follows and detailed further in Appendix 3:

1. transport
2. education from early years to lifelong learning
3. health and adult care
4. environment including waste collection and disposal
5. culture
6. sport and recreation
7. community and community safety
8. emergency services
9. conservation and
10. economic development.

Key strategic infrastructure requirements needed to deliver the objectives of the Core Strategy include the following (not in priority order):

- Ipswich flood defences;
- Sustainable transport measures e.g. additional park and ride, the Ipswich Major Scheme and accessibility improvements between the Central Shopping Area, Waterfront and railway station;
- Measures to increase east-west capacity in the transport system to ease congestion (including a Wet Dock Crossing);
- Strategic education provision of new schools;
- Strategic green infrastructure;
- Sports and leisure facilities serving the whole Borough;
- Community facilities including GP surgeries and health centres;
- Water management infrastructure;
- New primary electricity substation in Turret Lane; and
- Town centre environmental enhancements.

There will be specific requirements linked to the Northern Fringe that will be identified in the development brief supplementary planning document that will be prepared in advance of any development taking place there.

#### **Policy CS18 Strategic Flood Defence**

The Council will continue to work with partners to implement the Ipswich Flood Management Strategy as a key piece of infrastructure needed to support regeneration in Ipswich.

This policy links closely with policy CS17, as the flood defences are a key piece of strategic infrastructure needed to enable the continued growth and regeneration of the town.

#### **Policy CS19 Provision of Health Services**

The Council supports the bringing together of health sector facilities onto the Heath Road Hospital Site provided that all the following criteria are satisfied:

- a. Changes can be fully justified by patient and visitor needs;
- b. Changes take account of anticipated population growth and other demographic changes that could impact on health service provision; and
- c. A strategy is prepared for future development of the Heath Road site that includes a travel plan and measures to address local car parking issues.

In the case of the St Clements Hospital site, the Council is satisfied that the above criteria can be complied with, subject to related health facilities being acceptably relocated first. A detailed site allocation for alternative use on 12.57ha of the site will be made in the Site Allocations and Policies document.

Where other sites currently in health use become surplus to requirements over the plan period, the Council will only permit their redevelopment for non-health purposes provided a). and b). above are met and the site is not needed for another community use serving the local area. The latter point would be determined with reference to the one-ipswich board.

Proposals to develop additional local health facilities such as GP Surgeries will be acceptable provided that they are located in or adjacent to the town centre or a district or local centre. Exceptions will only be permitted where the applicant can demonstrate to the Council's satisfaction that the location would be fully accessible by all modes of transport, and would serve the patients or fill a gap in existing provision more effectively than any other better located and realistic available site.

#### **Policy CS20 East-West Transport Capacity**

The Council supports in principle the 'Ipswich: Transport Fit for the 21st Century' scheme. This will improve bus station provision, passenger information, shuttle bus provision and pedestrian links between the Central Shopping Area, the railway station and Waterfront.

In the longer term, the Council also supports the provision of significant alternative east-west transport capacity. To this end, it will make a case for a Wet Dock Crossing through a review of the local transport plan, in order to:

- a. Enable improvements to pedestrian and cycle routes between the Waterfront and the historic core of the town by subsequently reducing capacity on the Star Lane Gyratory;
- b. Enable the development of the Island Site for which access improvements, but not necessarily a Wet Dock Crossing, would be a prerequisite;
- c. Enable the linking of high quality walking and cycling routes around the entire Waterfront area; and
- d. Provide an alternative route for east-west movements to relieve congestion and air quality issues in the Gyratory, which in turn will support the town's economy and health.

In addition to this, the Council will actively encourage key partners to investigate the possibility of a northern by pass, to address the issue of central east-west movement, as well as issues associated with the capacity of the A14, particularly around the Orwell Bridge.

In the short term the Council will close the Waterfront route to general traffic, maintaining access only for pick up/drop off and the shuttle bus.

## **Development Control Policies**

### **Policy DC1 – Sustainable Development**

All new residential and non-residential buildings shall be required to achieve a high standard of environmental sustainability.

In this regard all developments exceeding the thresholds set out below shall achieve the following standards as a minimum unless, in exceptional circumstances, it can be clearly demonstrated that this is either not feasible or not viable:

8. Timescale s (grant of planning permission)	All dwellings (including apartments)		All other residential and non-residential development with a gross external floorspace of 500 sq m. or more*
	Developments of between 1 and 249 dwellings	Developments of 250 dwellings or more	
From 2010	Level 3 of the CfSH	Level 4 of the CfSH	BREEAM “Very Good”
From 2013	Level 4 of the CfSH	Level 5 of the CfSH	BREEAM “Excellent”
From 2016	Level 6 of the CfSH	Level 6 of the CfSH	BREEAM “Excellent”

Note: CfSH- Code for Sustainable Homes

\* smaller developments of this type will be encouraged to achieve BREEAM Very Good.

### **Policy DC2 - Decentralised Renewable or Low Carbon Energy**

All new build development of 10 or more dwellings or in excess of 1000sqm of other residential or non-residential floorspace shall provide at least 15% of their energy from decentralised and renewable or low-carbon sources unless it can be clearly demonstrated that this is either not feasible or not viable. The design of development should allow for the development of feed in tariffs.

### **Policy DC3 - Provision of private outdoor amenity space in new developments**

To ensure that new residential developments deliver a suitably high quality and environmentally sustainable living environment all such developments will be required to incorporate well designed and located private outdoor amenity space of an appropriate type and amount. Provision will be in accordance with the following standards:

For all houses, bungalows, or ground floor maisonettes with 3 or more bedrooms a minimum rear garden area of 75 sqm.

For all houses, bungalows, or ground floor maisonettes with 1 or 2 bedrooms a minimum rear garden area of 50 sqm.



For all apartments or upper floor maisonettes an average of 25 sqm. of private outdoor amenity space.

**Policy DC4 - Flooding and Sustainable Urban Drainage**

Development will only be approved where it can be demonstrated that the proposal satisfies all the following criteria:

- a. It reduces the overall risk of flooding in the area through the layout and form of the development and appropriate application of Sustainable Urban Drainage Systems (SUDS);
- b. It will be adequately protected from flooding in accordance with adopted standards wherever practicable;
- c. It is and will remain safe for people for the life time of the development; and
- d. It includes water efficiency measures such as rainwater harvesting, or use of local land drainage water where practicable.

**Policy DC5 - Urban design quality**

The Council will require all new development to be well designed and sustainable. In Ipswich this will mean:

- a. Layouts and designs that provide a safe, attractive, permeable, legible and useable public realm, which is pedestrian and cycle orientated;
- b. Areas which function better and where possible integrate residential, working and community environments and integrate well with adjoining areas;
- c. The promotion of community safety;
- d. Greener streets and spaces to contribute to local biodiversity, visual amenity, and health and well being, and offset the impacts of climate change;
- e. Protecting and enhancing the special character and distinctiveness of Ipswich and helping to reinforce the attractive physical characteristics of local neighbourhoods;
- f. Buildings that exhibit good architectural quality, are highly sustainable and are designed for long life by being capable of adaptation to accommodate changing needs and uses over time; and
- g. Ensuring that new residential development incorporates cycle and waste storage, public transport infrastructure and car parking if appropriate, all designed and integrated in a way that supports the street scene and safeguards amenity.

Design that is considered not to adequately meet all these criteria will be refused.

**Policy DC6 - Tall buildings**

Planning permission for tall buildings will only be granted within the arc of land to the south-west of the town centre in the vicinity of Civic Drive and the Northern Quays of the Waterfront, and provided the design of any proposed building satisfactorily addresses all of the following criteria:

- a. Relationship to context;
- b. Relationship to transport infrastructure;
- c. The architectural quality of the building;
- d. Sustainable design and construction;
- e. The credibility of the design in technical and financial terms;
- f. The contribution the building will make to public space and facilities;
- g. The effect on the local environment including microclimate;
- h. The contribution the development will make to the permeability of the site and the wider area;

- i. The provision of a well planned external and internal environment; and
- j. The effect of the building in terms of its silhouette and impact on strategic views, with particular reference to conservation areas.

#### **Policy DC7 – Public Art**

Planning permission for major developments will only be granted subject to the inclusion of a substantial public art proposal (e.g. equivalent to about 1% of the construction contract value of the development scheme). Proposals must be fully integrated into the proposed development at the design stage.

#### **Policy DC8 - Conservation Areas**

The Council will seek to protect and enhance the character and appearance of Conservation Areas through adopted Conservation Area Appraisals and Management Plans. These will be used to inform the Council's decisions when assessing the impact of proposals for planning permission.

#### **Policy DC9 - Buildings of townscape interest**

There is a presumption in favour of retaining and repairing buildings of local townscape interest. Proposals involving the loss of such buildings will only be permitted if it can be demonstrated by thorough analysis in the Design and Access Statement that the replacement building(s) is of an equal or higher standard of design and incorporates sustainability features.

#### **Policy DC10 - The Protection of Trees**

The Council will protect and retain trees in the interests of amenity by:

- a) Making Tree Preservation Orders; and
- b) Only granting consent for felling, topping, lopping or uprooting if a sound arboricultural reason is provided

Applications for development should retain existing trees of amenity or biodiversity value where possible. Where development affecting trees is proposed, the application will be accompanied by:

- c) An accurate survey and assessment of all existing trees on site in accordance with BS5837 "Guide for Trees in Relation to Construction" 1991; and
- d) Details of protective measures to be put in place during the development process to ensure the health and safety of each specimen to be retained; and
- e) Where removal is proposed, a plan for replacement planting on a one for one basis and using semi-mature specimens, unless otherwise agreed by the Council.

#### **Policy DC11 - Ipswich Skyline**

Central Ipswich is circled by a wooded skyline, which is particularly important to the setting of the central area including Ipswich Village and the Waterfront. Developments will only be permitted where they do not seriously disrupt this setting, especially when viewed from sensitive locations.

#### **Policy DC12 - Extensions to dwellinghouses and the provision of ancillary buildings**

Development within the curtilage of a dwellinghouse will be permitted provided that it:

- a. Ensures that sufficient garden space is retained; and
- b. Does not lead to the creation of a terracing effect where there are not already terraces; and
- c. Does not detract from the amenity of neighbouring residents particularly in terms of privacy, light or overbearing impact; and
- d. Is designed to be in keeping with the original dwellinghouse.

### **Policy DC13 Small scale infill or backland residential developments**

Proposals for small scale residential development involving infill, backland or severance plots will be permitted provided that the development:

- a. Is not sited in a location where it would be disturbed by other land uses;
- b. Establishes a safe and secure environment;
- c. Does not detract from the setting of existing buildings or the character and appearance of the area;
- d. Does not detract from the amenity of neighbouring residents particularly in terms of loss of privacy or light, or overbearing impact;
- e. Has safe and convenient access; and
- f. Has secure and lit bicycle storage and facilities for the storage of refuse, recycling and garden waste containers.

### **Policy DC14 The Subdivision of family dwellings**

Development involving the conversion of houses into flats, bedsits or houses in multiple occupation shall:

- a. ensure that sufficient car parking, secure and lit bicycle storage, amenity space and refuse, recycling and garden waste container storage is provided; and
- b. ensure that each unit of accommodation has a convenient principal entrance door and provides an appropriate standard of residential accommodation; and
- c. not lead to an overload of flats, bedsits or houses in multiple occupation in a particular area causing unacceptable levels of traffic congestion or activity; and
- d. not lead to detriment to a listed building, conservation area or the amenity of neighbouring residents; and
- e. not result in the conversion of small or modest sized family houses such as those containing 3 bedrooms or fewer or having a floorspace of less than 100 square metres.

### **Policy DC15 - Travel Demand Management**

In proposals for the development of 10 or more dwellings or 1,000 square metres or more of non-residential floorspace, or where more than 50 people will be employed, the Council will require:

- a. A transport assessment to be undertaken including an assessment of the impact on the local highway network with appropriate mitigation measures secured by a planning obligation;
- b. Where likely to have an impact on or be located in an Air Quality Management Area or other sensitive area, an assessment of the air quality impacts of the development with appropriate mitigation measures proposed as necessary;
- c. A travel plan outlining how the development will ensure high levels of cycling and walking together with public transport use;
- d. The minimisation of the use and ownership of the car by providing an integrated solution which could include car clubs, well-designed cycle and pedestrian routes, high quality secure cycle storage and good access to public transport within 200 metres of the development; and
- e. For non-residential developments, high quality shower facilities and lockers to ensure that a modal shift can occur.

### **Policy DC16 - Sustainable Modes**

When considering proposals for all other developments not included in Policy DC14, the Council will expect:

- Good access to public transport within 200 metres of the site; and
- High quality, secure cycle storage (see also Policy 35 Parking).

### **Policy DC17 - Transport and Access in New Developments**

Each development proposal will be assessed in terms of:

- a. Its impact on the road network in respect of traffic capacity, highway safety and the environmental impact of generated traffic;
- b. Pedestrian and cycle accessibility to and within the site as well as the wider effects of the development upon pedestrian movement;
- c. Its impacts on rights of way; and
- d. Availability of and access to public transport.

The Council will require mitigating measures to be provided to the satisfaction of the Highway Authority where necessary.

### **Policy DC18 - Car Parking**

The Council will require local parking standards to be complied with in all new development. These will comprise a set of minimum parking standards for residential development, and maximum parking standards for non-residential uses. The Council will expect parking to be fully integrated into the design of the scheme to provide secure and convenient facilities. For residential schemes, although a minimum standard is applicable, car parking must be designed so as not to dominate the development or street scene or to result in the inefficient use of land.

A central car parking core will be defined in the town centre, through the IP-One Area Action Plan. Within the central car parking core, only operational car parking will be permitted in connection with non-residential development, so that the stock of long-stay parking is not increased. New, non-residential long stay car parks will not be permitted.

Reduced, maximum, standards of provision for residential development will apply within the IP-One Area, which has frequent and extensive public transport networks, and easy access to a wide range of employment, shopping, and other facilities.

### **Policy DC19 - Cycle Parking**

The Council will require minimum standards of cycle parking to be met for all new residential and major non-residential development proposals. All cycle parking is expected to be of a high quality and secure. The Council will also require the provision of secure cycle parking in any new car parks in the town.

### **Policy DC20 - The Central Shopping Area**

The Council will support the town's vitality and viability by promoting and enhancing appropriate development in the Central Shopping Area.

The Central Shopping Area comprises the Primary, Secondary and Specialist Shopping Areas, which will be defined in the IP-One Area Action Plan. Sites identified as suitable for major retail investment will be allocated in the IP-One Area Action Plan.

Class A1 retail use should remain the predominant use at all times in the Central Shopping Area, to ensure the strategic retail function of Ipswich is maintained. Non-A1 retail uses will also be supported, provided the overall percentage of the frontage does not exceed the levels specified below.

Primary Shopping Area – non-A1 retail uses will be permitted where they will not exceed 10% of a group of identified ground floor frontages and the site is not adjacent to an existing non-A1 retail use within the same Use Class as the proposal. A5 uses will not be permitted.

Secondary Shopping Area – non-A1 retail uses will be permitted where they will not exceed 25% of a group of identified ground floor frontages, and provided the proposal does not create a concentration of more than 30 metres of non-A1 retail frontage, and the site is not adjacent to an existing non-A1 retail use within the same Use Class as the proposal. Of this 25%, no more than 10% of the total identified ground floor frontage will be permitted for A4 or A5 uses.

Specialist Shopping Area - non-A1 retail uses will be permitted where they will not exceed 40% of a group of identified ground floor frontages. Of this 40%, no more than 35% of the total identified ground floor frontage will be permitted for A4 or A5 uses.

A3, A4 and A5 uses will only be permitted where they have no detrimental effect on the amenities of nearby residential accommodation in terms of noise, fumes, smell, litter and general activity generated from the use.

Mixed use development, including B1 office, A2 financial and professional services, C3 housing, and C1 hotel or any combination of these uses will be supported in the Central Shopping Area, provided there is a ground floor retail use.

Within primary and secondary shopping areas, the Council will not grant planning permission for the use of a ground floor unit to a use falling outside classes A1 to A5.

The Council also supports the retention of the open market.

#### **Policy DC21 - District and Local Shopping Centres**

The Council will support the retention and provision of local shops and community facilities within defined District and Local Centres.

Within the defined District and Local Centres:

- a. proposals for the provision of additional shops or extensions to existing shops will be permitted provided they are of a scale appropriate to the centre. In the case of food supermarkets, they should not exceed 1,500 sq m in scale. The requirements of PPS6 should be satisfied.
- b. proposals for change of use from A1 to non-A1 retail uses will be permitted where they will not exceed 40% of the total identified ground floor frontage, provided the identified shopping frontage or the shopping character and range of shops is not unacceptably diminished. Of this 40%, no more than 20% of the total identified ground floor frontage will be permitted for A4 or A5 uses.
- c. proposals for the change of use of ground floor units to community facilities will be permitted provided:
  - b) the unit is not especially prominent in the Centre; and
  - c) satisfactory vehicular access and car parking can be provided; and
  - d) the unit has suffered from a clearly demonstrated long-term vacancy for a period of at least 12 months; and
  - e) the physical treatment of the unit minimises the problem of dead frontages or is appropriate to the proposed use.

Outside District Centres but within a 400m straight line distance of the centre the provision of community facilities will be permitted provided the facility:

- a) is appropriate in scale and supports the needs of the adjacent residential area; and
- b) is accessible to all sectors of the community; and
- c) offers satisfactory vehicular access and car parking space in accordance with the Council's standards.

Two new District Centres are proposed within the plan period, 1) Sproughton Road and 2) Duke Street. These centres will provide retail units and community facilities of a scale appropriate to serve their catchment area. If development takes place at the Northern Fringe, a new District Centre will also be required there.

**Policy DC22 Town centre uses outside the Central Shopping Area**

Within the Town Centre but outside the Central Shopping Area, the development of non-retail town centre uses, including leisure, recreation, culture and tourism uses, will be permitted. This area must be considered before edge or out of centre locations for these town centre uses. B1 office uses and mixed use schemes including housing will also be encouraged in the town centre, however industrial uses (Classes B2 and B8) will not be permitted.

**Policy DC23 – Major Retail Proposals Outside Defined Centres**

Major retail proposals for more than 200 sq m gross floorspace in locations outside defined centres will only be permitted if the proposal can be demonstrated to be acceptable under the terms of PPS6. Particular regard should be given to

- 1) the need for the development
- 2) the appropriate scale of development
- 3) the sequential approach
- 4) avoiding adverse impact on existing defined Centres and
- 5) accessibility by a choice of means of transport.

**Policy DC24 - Loss of residential accommodation**

Proposals that would lead to a net loss of residential units will only be permitted if the development would result in a necessary community facility being provided or if the existing residential unit is unsuitable for continued residential use. Any proposed use must be compatible with its surroundings.

**Policy DC25 - Affordable Housing**

Affordable housing provision will be required in accordance with Core Policy CS12.

The presumption will be in favour of on site provision rather than the payment of commuted sums in lieu of provision.

The Council will require that the affordable housing:

- is designed and built to the highest standards including the appropriate level of the Code for Sustainable Homes at the time;
- is integrated into developments and from external appearance should be indistinguishable from the market housing;
- should not generally be grouped in clusters of more than 12-15 units; and
- has car parking provided at the same ratio as for the development as a whole.

The appropriate type, size, mix and tenure will be determined by the findings of the Borough's Housing Needs Survey and Strategic Housing Market Assessment, which will be updated over time, and the particular characteristics of the site.

The Council will only consider reducing the requirement for the proportion of affordable housing in an open market development where an independent assessment of the applicant's development costs is carried out at the applicant's expense.

**Policy DC26 - Protection of employment land**

Sites and premises used and/or allocated for employment uses will be safeguarded for that purpose. Permission for the conversion, change of use or redevelopment of business, general industrial or distribution sites or premises for non-Class B1, B2 and B8 purposes, as defined by the Use Classes Order 1987 (as amended), will only be permitted where:

- The proposed use is compatible with the surrounding uses; and
- It can be demonstrated to the Council's satisfaction that the alternative uses are employment uses with no reasonable prospect of locating elsewhere within the Borough; or
- The existing use is generating unacceptable adverse environmental impact.

**Policy DC27 - Amenity**

Development which could lead to serious adverse effects on the amenity or environment of neighbouring uses will not be permitted.

Development which could itself be seriously adversely affected by the conduct of established or potentially noisy or polluting uses nearby will not be permitted. PPG24 and BS4142 surveys will be required in relation to noise.

Exceptions will only be made where satisfactory mitigation measures can be secured through the use of planning conditions or Section 106 planning agreements.

**Policy DC28 - Non-residential uses in residential areas**

Non residential uses in residential areas will be permitted where the proposed development

- would not involve the loss of a dwelling unless the use provides a necessary community facility; and
- is compatible with the size and scale of housing in the surrounding area and would not have a harmful effect on that area through traffic generation and general activity as a result of excessive numbers of people calling at the premises throughout the day and night; and
- can be satisfactorily accessed and serviced.

**Policy DC29 - Protection of Open Spaces, Sport and Recreation Facilities**

Development involving the loss of open space, sports or recreation facilities will only be permitted if:

- The site or facility is surplus in terms of all the functions an open space can perform, and is of low value and poor quality, as shown by the Ipswich Open Space, Sport and Recreation Facilities Study 2009; or
- Alternative and improved provision would be made in a location well related to the users of the existing facility.

**Policy DC30 - Provision of New Open Spaces, and Sport and Recreation Facilities**

All residential developments, and non-residential developments of 1000 sq m floorspace or more, will be required to provide and/or contribute to open spaces and sport and recreation facilities, to meet the needs of their occupiers.

In all major developments (10 dwellings or 1000m<sup>2</sup> non-residential development or more), at least 10% of the site area should consist of incidental green space (useable by the public in relation to residential schemes).

The level of further provision or contribution will vary according to the size of the proposed development and the quantity and quality of existing open spaces and sports and recreation facilities within the catchment area of the site, as identified by the Ipswich Open Space, Sport and Recreation Study 2009 and subsequent monitoring. Provision will be made in accordance with the standards set out in Appendix 5.

One for one replacement dwellings will be exempt from the requirements of the policy, because they are likely to have a minimal impact on demand for facilities. In addition, only certain types of open space will be required for elderly persons' accommodation and nursing homes.

The requirement will apply to affordable housing schemes, unless it can be demonstrated that this would lead to the scheme being unviable. In such cases, a reduced level of provision will be negotiated with the applicant.

### **Policy DC31 - The Density of Residential Development**

The density of new housing development in Ipswich will be as follows:

- a. Within the town centre, Ipswich Village and Waterfront, development will be expected to achieve a high density of at least 90 dwellings per hectare (dph) (the average will be taken as 110 dph);
- b. Within the remainder of IP-One, District Centres and an 800m area around District Centres, development will be expected to achieve a medium density of at least 40 dph (the average will be taken as 45 dph); and
- c. Elsewhere in Ipswich, low density development will be required, achieving a density of at least 30 dph (the average will be taken as 35 dph).

Exceptions to this approach will only be considered where:

- d. The site location, characteristics, constraints or sustainable design justify a different approach; or
- e. A different approach is demonstrated to better meet housing needs in the area; or
- a. A different approach would expedite the delivery of housing needed to meet targets and is acceptable in other planning terms; and
- b. The approach would not prejudice the five year housing land supply.

### **Policy DC 32 - Conserving Local Natural and Geological Interest**

The Council will seek to conserve the nature conservation and geodiversity interest of County Wildlife Sites, Local Wildlife Sites and RIGS identified on the Proposals Map, and Suffolk Biodiversity Action Plan species and habitats, by controlling the type and intensity of development. The Council will not grant planning permission for development which would be likely to cause net loss after mitigation and compensation of the relevant biodiversity or geodiversity interest, or protected BAP species, in terms of population size or loss of extent of BAP habitat or feature for which the site was designated.

### **Policy DC33 - The Protection and Provision of Community Facilities**

The Council will work with partners to ensure that a range of local community facilities is made available and retained to meet local needs. Where possible and appropriate, opportunities will be taken to provide shared space for the delivery of community services.

The redevelopment or change of use of community facilities to non-community uses will only be permitted where the applicant can demonstrate to the Council's satisfaction that the facility is genuinely redundant and surplus to current and future requirements, or where appropriate alternative provision is proposed or available within a reasonable distance.



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

### 7.2.1 Assessment methodology

The policies and a “do nothing alternative” were assessed against the 22 SA objectives listed in Chapter 5 using the scoring system in table 7.2. For each SA objective the impact on the indicators associated with them (see Appendix 2) were considered and possible direction of impact recorded.

*Table 7.2: SA scoring system*

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

**7.2.2** A summary of the results can be seen in Table 7.3, whilst the full results for each policy option can be seen in Appendix 3. Appendix 3 also records any secondary, short, medium or long term effects for each policy and options. Synergistic effects have been noted with the secondary effects. The overview and summary is based on the long term effects.

*Table 7.3: SA scores for the 53 Policies*

Policy	Policy Option	Alternative (Do Nothing)	Highest score
CS1	10	-10	Policy
CS2	19	-7	Policy
CS3	24	-10.5	Policy
CS4	17	-8	Policy
CS5	15	-8	Policy
CS6	13	-7.5	Policy
CS7	-7	-1	Alternative
CS8	11.5	-4.5	Policy
CS9	8	5.5	Policy
CS10	1	0	Policy
CS11	23.5	-10	Policy
CS12	6	-3	Policy
CS13	6	-9	Policy
CS14	12	-14	Policy
CS15	12	-9	Policy
CS16	3	-4	Policy
CS17	25	-16	Policy
CS18	5	-9	Policy
CS19	2	-7	Policy
CS20	3	-8	Policy
DC1	7.5	-6	Policy
DC2	4	-2	Policy
DC3	1	-2	Policy
DC4	4	-6	Policy
DC5	7	-3	Policy
DC6	5.5	-4	Policy
DC7	2.5	0	Policy
DC8	5	-4	Policy
DC9	4	-5	Policy
DC10	2.5	0	Policy
DC11	6	-9	Policy
DC12	6	-2	Policy
DC13	3	-5	Policy
DC14	8	-4.5	Policy
DC15	12	-11	Policy

DC16	6	-4	Policy
DC17	7	-7	Policy
DC18	3.5	-1	Policy
DC19	5	-4	Policy
DC20	4	0	Policy
DC21	2.5	-7	Policy
DC22	11	-3	Policy
DC23	7	-2	Policy
DC24	3	3	Policy
DC25	2	-1	Policy
DC26	5	3	Policy
DC27	7.5	-6	Policy
DC28	8.8	-3	Policy
DC29	8	-7	Policy
DC30	8	-8	Policy
DC31	7	-8	Policy
DC32	7.5	-6	Policy
DC33	9.5	-10	Policy

### 7.2.3 Appraisal results

Of the 53 policies, implementation of the policy outscored the “do nothing” option in 52 cases. The one Policy in which the alternative options scored more highly is dealt with below:

### 7.2.4 Policy 7 – The Amount of New Housing

Policy 7 scored negatively in sustainability terms. This was largely due to the implications of large scale housing development. Negative scores were recorded for the potential impacts upon soil quality and resources, biodiversity and geodiversity, landscapes and townscapes, energy use, archaeology and flood risk.

It should however be noted, that the amount of new housing to be delivered is dictated at a national level, and the issues outlined above, which render this policy unsustainable, should be mitigated through the other policies of this document, in particular the development control policies which aim to protect natural capital and ensure housing is placed in sustainable locations.

## 7.3 Description of the significant sustainability effects

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

## 7.4 Why the policy options were chosen

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

## 7.5 Any proposed mitigation measures

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

### 7.5.2 Policy CS2 – The Location and Nature of Development

Policy CS2 (location of development) generally has a high sustainability score however scores negatively on only one aspect; flood risk. The policy suggests focussing development around district centres; however, at least two of the district centres are in or adjacent to flood risk zones (e.g. Bramford Road, IP-One and Duke Street). This will be mitigated against if development in flood zones is phased to be completed after the development of the flood barrier (CS18).

### 7.5.3 Policy CS3 – The IP-One Area Action Plan

Flood risk is again a potential problem when placing development in the Ip-One area. This will be mitigated by the building of the flood defence barrier which is referred to in one of the core policies of this document (CS23). However until it is built, phasing development to areas least at risk or requiring mitigation of flood risk through design could be added to the policy wording. Flood risk would be a particular issue in the South Western areas of Ip-One, including many of the waterfront areas referred to within the policy justification.

#### **7.5.4 Policy 4 – Protecting our Assets**

The option for Policy 4 advocates creation of a Wet Dock and the protections of the Central Conservation Area. This development may damage the townscape of central Ipswich. However this is mitigated by DC5, Urban Design Quality, which requires development be appropriate for the character of the area.

#### **7.5.5 Policy CS7 – The Amount of New Housing**

The option for Policy CS7 (amount of housing) generated several negative impacts, largely as it concerned large amounts of development for housing (possibly built in flood risk zones, requiring greenfield land, damaging biodiversity), and the related impacts of an increased population (higher energy use and waste levels), increased traffic and worsened air quality. Some of these issues can be avoided completely, by stating that greenfield land, protected areas and flood risk zones will not be considered for development, (although it is recognised that this is difficult given the level of growth expected by the RSS) or that development in such areas will ensure no damage or increased risk (e.g. in the case of flood risk zones, that the ground floor would not be inhabited). The issues of energy use, waste and traffic are almost impossible to avoid, but can be mitigated through support for carbon-neutral or low carbon developments, (as suggested by development control policy CS1) ensuring space for recycling facilities, and support for sustainable transport.

#### **7.5.6 Policy CS8 – The Balance between flats and houses**

Policy CS8 (house/flat balance) has one negative; the possibility of an increased risk of flooding if dwellings are built in the flood plain. This can be mitigated by stating that no development will be allowed in flood risk zones, or that development will be phased so areas less at risk are developed before the barrier is operational, or including supporting policies which minimise risk (e.g. building flats where the ground floor is not inhabited, or flood-proofing homes).

#### **7.5.7 Policy CS9 – PDL Target**

The option for Policy CS9 (previously developed land) scores negatively on two issues; flood risk and biodiversity. Significant amounts of PDL in Ipswich are in the flood risk zone along the river, though this can be mitigated as mentioned in the Policy 8 section above. In terms of biodiversity, PDL sites may have greater biodiversity potential than agricultural greenfield sites, and developing them may harm wildlife. This can be mitigated by ensuring that development includes green space, as per other policies.

#### **7.5.8 Policy CS10 – Northern Fringe**

Negative effects associated with the development of the northern fringe of Ipswich were the use of greenfield land, and related effects such as the impact upon landscape character, this would have to be mitigated against through development management policies related to the nature of development and ensuring impacts upon surroundings are minimal.

#### **7.5.9 Policy CS13 – Number of Jobs to be planned for**

This policy (number of jobs) generated several negative impacts, largely as it concerned a significant increase in the number of jobs. The negatives included an increase in traffic and a subsequent worsening of air quality, an increase in the amount of waste and energy used, the possibility that greenfield land may be required for development, and the possibility of a large influx of people to fill the new jobs disrupting the community. Whilst most of the issues are largely unavoidable, mitigation is possible through specific support for measures such as improving sustainable transport (bus services and cycle lanes), co-location of jobs and housing, low carbon or carbon-neutral development and waste plans. National policy already requires that development

of land follows a sequential approach that would seek to maximise the use of previously developed land before Greenfield. There are sufficient policies within the document to suggest that development will take into account the above considerations, thus mitigating against the negative impacts forecast for this job creation policy.

#### **7.5.10 Policy CS14 – Retail Development**

Policy CS14 concerning retail developments scored negatively on four of the indicators. These included generation of waste, energy use, altering townscapes and landscapes. The policy scored strongly on negating impacts of traffic through concentrating people in the town centre, which should be accessible through sustainable transport. The negative impacts of this policy should be mitigated through the effect of other policies in this DPD. Sustainable building should reduce energy use, in combination with recycling targets and use of recycled materials as outlined in policy CS1. Much of central Ipswich is designated as a Conservation Area; hence it would be important that any retail development was sympathetic to the character of Ipswich, in order not to damage the townscape. In terms of other positive impacts of this policy, it is envisaged that jobs and investment levels could benefit, which would then have secondary effects on issues such as reduced crime, improved health and skills.

#### **7.5.11 Policy CS15 – Education Provision**

The option for policy CS15 (education provision) scores negatively on several issues, all of them related to development of facilities, focussing on the support for the new sixth form centre located outside the Borough. The site for the new sixth form centre is (a) greenfield land, (b) home to protected species, and (c) contains an archaeological site and hence this example suggests a weakness in the policy. As further educational facilities are developed, this may again be a problem. Whilst the use of greenfield land can only be mitigated by choosing a new, brownfield, site, the impact on biodiversity and archaeology can be mitigated by ensuring that the grounds of the new school include a biodiversity area and that rescue archaeology takes place during the construction phase. These mitigation measures should be required on any future development in Ipswich through the development control policies.

#### **7.5.12 Policy CS16 – Green Infrastructure, Sport and Recreation**

The policy for requirement of green infrastructure, sport and recreation is generally sustainable but scores slightly negatively on one indicator; conserving soil resources. A requirement for open space may result in extra land being needed for development. However, in some cases this might create more space than the previous use so is not a concern.

#### **7.5.13 Policy CS18 – Strategic Flood Defence**

There are two negative impacts associated with policy CS18, strategic flood defence, as well as various potential secondary risks which should be considered. Flood risk would only be affected negatively in the short term. This is due to the note in the policy wording that the barrier is not likely to be in place until 2012; two years into the lifespan of the DPD. If development is still allowed to proceed in the flood risk zone around IP-One, then this would not alleviate flood risk. This could be mitigated against by phasing, preventing development until the barrier is completed, as proposed in policy CS8. This however has its own negative impacts, such as constraining development and leaving derelict land.

#### **7.5.14 Policy CS19 – Health Service Provision**

Policy CS19 (health services) scores negatively on three issues, the possible development of greenspace at the St Clements site if the hospital is closed and the site used for housing, and the impact on protected species known to be living on the site, as well as increasing waste production. This can be mitigated against by ensuring that any development is (a) sympathetic to biodiversity and (b) carried out at a time at which the species would be least active. This should be mitigated by CS19. One uncertainty is the impact of greater centralisation of health services at the Heath Road site which is already adjacent to an air quality area of concern. This will be mitigated by the reference to requiring a travel plan.

#### **7.5.15 Policy CS20 – Waterfront and Town Centre Transport**

This policy scores negatively on a range of issues, including biodiversity and environmental indicators, and encouraging efficient movements. These are mainly due to the Wet Dock crossing and the support of increased road building. It is considered that encouraging efficient movements would be centred around public transport provision, and increasing road capacity will not be efficient, increasing traffic, hence emissions, and greenhouse gas contributions. It could however be argued that increasing road capacity could alleviate congestion and air quality concerns, however a focus on modal shift would be more favourable in comparison with increasing road capacity.

Other environmental concerns included the conservation of wildlife and species at the Wet Dock site, and indeed any sites that may be chosen for future road development. This could be mitigated through species surveys, habitat creation, or relocation which is covered by CS4 (a).

### **Development Control Policies**

#### **7.5.16 Policy DC1 – Sustainable Development**

The only negative impact associated with this policy is the slight potential to limit inward investment. It is assumed that through creating strict standards to which buildings must be built and maintained, developers and investors may prefer to locate elsewhere if those areas have less stringent measures. Aside from this, the positive impacts from the policy outweigh this slight negative. This policy will contribute to achieving the Suffolk Community Strategy target of 60% reduction in carbon emissions by 2025. There is a need to meet zero carbon (equivalent to code 6 CFSH) by 2016 regardless. Introducing higher standards than proposed could however increase the likelihood of deterring investment.

#### **7.5.17 Policy DC2 – Decentralised Renewable or Low Carbon Economy**

Policy DC2 scored slightly negatively on only one indicator. In implementing a policy which states that all developments of ten or more dwellings should include decentralised power generation, there is scope to discourage development. On the positive side, contributions to climate change should decrease, and jobs be created in the renewable energy sector, potentially boosting investment in this sector overall. The policy bolsters its effectiveness by requiring other energy efficient measure to be introduced if it is demonstrated that it's not feasible or viable to source 15% of energy from renewable sources.

#### **7.5.18 Policy DC3 – Provision of private outdoor amenity space in new developments**

This policy is sustainable with one negative impact associated with it, and this was simply that through providing private open space within developments, housing development is likely to be less dense, hence decreasing provision overall. This is clearly the only negative aspect of a positive policy overall, in terms of health, social and environmental impacts. The setting of higher amenity space requirements would have the negative impact of more land taken, however green space would benefit biodiversity and quality of life. No mitigation required.

#### **7.5.19 Policy DC4 – Flooding and SUDS**

This is an important sustainability policy that could allow development to go ahead in flood risk areas, but manage the risk prior to the Ipswich tidal barrier.

#### **7.5.20 Policy DC5 – Urban Design Quality**

Policy DC5 was a strong policy in terms of addressing waste bin and storage, and maintaining the sense of place in Ipswich. The only negative aspect of the policy was associated with the lack of clarity that waste storage would include recycling facilities on or close to developments. An additional note to the policy would strengthen this aspect. Clarifying either in the policy or the supporting text, that waste bin storage includes recycling bins could strengthen this policy. (NB this is done in DC12 but only with reference to specific developments)

#### **7.5.21 Policy DC6 – Tall Buildings**

There were some slight negative impacts considered possible as a result of this policy, however it is noted in the assessment that they should be mitigated through wording in the policy justification. The main concern was the way tall buildings could alter the landscape and character of the town. Although the policy addresses the issue of strategic views and Conservation Areas, it was considered that it would be impossible to mitigate completely against impact here.

#### **7.5.22 Policy DC10 – Protection of Trees**

Two slight negative impacts were identified as a result of policy DC9. The protection of trees could limit the quantity of land available for housing and employment land development, although this is likely to be extremely marginal. In practice, development should still be viable, and TPOs should be worked around in design of development. Overall the policy is sustainable.

#### **7.5.23 Policy DC11 – Ipswich Skyline**

Given that this policy sought to protect the wooded areas surrounding Ipswich, there were plenty of positive impacts environmentally and socially. However it was considered that there was one negative impact, which was that protection of the wooded fringes of Ipswich could limit the amount of land available for development. If sufficient focus is placed on the use of PDL, and selective approaches taken to the town fringes, this should not be a problem in terms of the sustainability of the policy.

#### **7.5.24 Policy DC13 – Small Scale Infill**

Negatives here are associated with the potential for loss of gardens (and therefore habitats and species) and the cumulative impact that this may have on the townscape and landscape. This is mitigated against to some extent in the policy wording, however is a concern with this nature of development.

#### **7.5.25 Policy DC18 – Car Parking**

Some slightly negative impacts have been associated with policy DC18, which sets out car parking standards, and suggests car parking is integrated into new development. Any provision of car parking could result in increased traffic, and given that the plan is largely an urban town centre, this could cause congestion and air quality issues. Mitigation is provided in DC15 Travel Demand management where transport assessments will be required for larger developments to ensure adequate traffic management.

#### **7.5.26 Policy DC20 – The Central Shopping Area**

This policy, which promoted development in retail areas of the town centre, was considered to have a net positive impact. There was however one negative, and one slight negative impact associated with the policy. The lesser negative of the two identified was that potential exists to alter the townscape of the town centre through retail development, much of which would be within a conservation area. This should be mitigated through the suite of development control policies. It was however also noted that waste levels would increase if there was a marked increase in the scale of retail development; this could also be mitigated through waste management and promotion of recycling.

#### **7.5.27 Policy DC21 – District and Local Shopping Centres**

Policy DC19 was considered to have the potential for negative impacts on various indicators. Primarily, the policy did not do enough to encourage sustainable or public transport. The policy addressed the need for car parking, but did not reflect the need to ensure the development is placed close to public transport networks, bus stops and similar. It should be noted however that this is mitigated through policy DC15. This could be mitigated through an addition to the policy wording. It was also noted that potential exists to alter townscape through retail development. This should be mitigated through the suite of development control policies. It was also noted that waste levels would increase if there was a marked increase in the scale of retail development; this could also be mitigated through waste management and promotion of recycling.

#### **7.5.28 Policy DC22 – Retail use outside of defined shopping areas**

Negative impacts associated with this policy include use of land which might otherwise be used to contribute to meeting the housing needs of the community, and no consideration of waste management and recycling. The latter is also picked up as a concern in DC20 and DC21 suggesting the need of this to be addressed somewhere in the plan policies.

**7.5.29 Policy DC24 – Loss of residential accommodation**

This policy scored negatively in that it could reduce the provision of housing for the community and discourages new employment uses to meet changing personal needs (eg internet cafe, social care support) being located in the community or redressing the balance of workplace being close to homes. It constrains flexibility however it is generally sustainable so monitoring the nature and number of applications is suggested.

**7.5.30 Policy DC25 – Affordable Housing**

The negative impact associated with this policy is through the provision of car parking and associate scope to increase traffic. Although this can be mitigated through various techniques, and effectively through other policies (DC15 and Dc16), there is no mention within this policy of sustainable transport or cycle provision in association with affordable housing provision.

**7.5.31 Policy DC29– Protection of open spaces, sport and recreation facilities**

This policy had a high net positive outcome, with the only negative issue being the limitations which the policy may place on the quantity of land which may become available for housing development.

**7.5.32 Policy DC30 – Provision of new open spaces, sport and recreation facilities**

This policy had a high net positive outcome, with two negative issues being the limitations which the policy may place on the quantity of land which may become available for housing development. This is not considered significant and adequate provision of land for housing is made through other policies. The other negative, more importantly concerned poverty and social exclusion. The policy suggested affordable housing schemes would not have to provide the same level of open space if it made the scheme unviable and a reduced level would be negotiated. This would result in an identifiable difference between open market and affordable, introducing a level of discrimination that can define poverty. The need for inclusion of this statement should be reconsidered and at least qualified by adding that reduced levels might be considered provided there is adequate provision for drying laundry and a public open space (eg park) within 400m.

**7.5.33 Policy DC31 – Housing Density**

Development of high density housing had many positive issues associated with it, for example the efficient use of land, high provision of dwellings and a willingness within the policy to develop in accordance with the character of different areas. However it scored negatively on social aspects in terms of creating sustainable communities. There was a lack of consideration about the infrastructure needs associated with high density development, for example crime and cohesion may suffer, as well as the educational and service needs of a densely populated area. These issues could be incorporated into the policy though revised wording.

**7.5.34 Policy DC32 – Natural and Geological Interest**

Negative impacts associate with this policy were slight in terms of severity, however it was noted that there was some potential for limitations to housing and economic growth through intensified conservation in Suffolk. Clearly there is a balance to be met here, and as per national policy any development should take place in locations where damage is unlikely, or can be mitigated.

## **8. LIKELY SIGNIFICANT EFFECTS OF THE PLAN**

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

**8.1.1** The significant effects of the 53 policies are summarised in Table 8.1 overleaf. The final column shows the combined impact on the 22 sustainability indicators of the policies. For the large majority of indicators, the overall effect is positive, and much stronger across the range of indicators than at the Preferred Options stage.

**8.1.2** Implementation of the preferred policies as a group of policies, have the potential to build and maintain sustainable communities in Ipswich in the long term. The plan should make a difference to the quality of life of where people live, improving access to services and water and air quality. The latter is a result of the policies that seek to conserve and reuse water and activities that should reduce the level of traffic and congestion, thereby improving air quality. Other strengths include preserving soil resources, achieved through the requirement to prioritise the use of previously developed land, as would be expected in an urban area.

**8.1.3** The plan will also encourage indigenous and inward investment through the quality of the environment it will create and this will help increase the number of jobs and level of prosperity. Social exclusion should be reduced by the implementation of policies to provide sustainable transport modes. However it is noted that one policy stands out as having a significantly negative impact on poverty and social inclusion relating to reduced levels of open space in affordable housing developments in certain circumstances.

**8.1.4** The plan is less effective at reducing waste, with the policies achieving a combined score of 2 suggesting waste minimisation or recycling are not significantly embedded in the plan. Although policies CS1 (sustainable development, encouraging renewable energy), CS4 (protecting our assets, encouraging recycling), CS17 (Delivering Infrastructure) and DC1, DC13 and DC14 (sustainable development, BREEAM standards, infill and subdivision) scored positively for waste reduction, there were missed opportunities in other policies. There is however a section of policy CS4 which states that all new developments must minimise waste generation throughout their construction period and lifetime. No statement about provision of community recycling facilities or household waste sites is evident, and this would represent a means to bolster the plan in this respect. Chapter 10 considers some further opportunities to improve this.

**8.1.5** Three other issues, conserving and enhancing biodiversity, reducing vulnerability to climatic events / increasing sea levels and minimising the chances for crime and anti social activity, had low scores of between 6 and 8. Crime and anti social activity is adequately covered in CS5 Urban design. Seven policies were negative on reducing vulnerability to climatic events and rising sea levels; the location and nature of development (CS2), IP-One area action plan (CS3), the amount of new housing (CS7), the balance between flats and houses (CS8), the number of jobs to be planned for (CS15) and retail development (CS18). There is potential however to mitigate this through ensuring that flood risk policies are implemented prior to development, or altering policy wording to this effect.

**8.1.6** For biodiversity, seven policies had negative impacts; amount of housing (CS7), PDL (CS9), northern fringe (CS10), education provision (CS15), health services (CS19), east-west transport capacity (CS20) and small scale infill DC13). Policy CS4 Protecting our assets has the potential to provide mitigation due to the wording regarding protection and enhancement to the biodiversity asset. There are references to the Orwell Estuary in the plan, as well as references (CS4) to appropriate assessment which should go some way to safeguarding the SPA. This is further mitigated through DC32.

**8.1.7** CS1 and DC2 are very clear and strong on energy efficiency. Four policies were negative on reducing greenhouse gas emissions that contribute to climate change; amount of housing (CS7), PDL (CS9), the number of jobs (CS13) and car parking (DC18). These activities will result



in greater use of energy and hence the importance of CS1 requiring energy efficiency and use of renewable sources.

**8.1.8** There were only four strongly negative impacts recorded overall. Strongly negative impacts were recorded against policies CS2 (the location and nature of development), CS10 (northern fringe), CS19 (provision of health services) and DC30 Provision of open space. The most important of these issues is the location of development on flood plains, which could result in significant flood risk until policy DC4 and DC18 (flooding and sustainable urban drainage) is implemented. Other concerns can be mitigated through improved policy wording as set out in 8.1.

**8.1.9** None of the proposed policies were considered to have a negative impact on improving the health of the population overall, and helping to meet the housing needs of the whole community.

**8.1.10** In summary the plan is strongest in its consideration of quality of life and reducing the impact of traffic on air quality. The areas which are of most concern are reducing waste, and reducing vulnerability to climatic events and rising sea levels.

Table 8.1: Sustainability appraisal of the core strategy policies

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	T	
ET1. To improve water and air quality	++	+	+	0	++	+	-	+	+	+/-	+	0	-	++	+	+	++	0	?	+/-	++	+	0	++	0	+	0	+	0	0/+	0/+	++	0	0/+	++	+	++	0/-	+	+	0	0	0	0	+/-	+0	++	0/+	0	0	+	+	0	35.5	
ET2. To conserve soil resources and quality	+/-	+	++	++	0	+	-	+	+	--	+	+	+	++	+/-	-	0	+	+	+	0	0	+/-	+/-	0/+	0/+	0	0	+	0/+	+	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	++	0	20.5	
ET3. To reduce waste	++	0	0	++	0	0	-	0	0	0/-	+	0	-	-	0	0	+	0	-	0	++	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0/-	0/-	0	0	0	0	+	0	0	0	0	0	0	4		
ET4. To reduce the effects of traffic upon the environment	+	+	++	++	++	+	-	+	+	+/-	0/+	0	-	++	+	0	++	0	+	-	0	0	0	0	0/+	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0/-	0/-	0	0	0	0	+	0	0	0	0	0	24.5	
ET5. To improve access to key services for all sectors of the population	0	++	++	++	++	+	0	+/-	+	0	++	0	0	-	++	0	+	0	+	+	++	0	0	0	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	?	0	++	31.5
ET6. To reduce contributions to climate change	++	0	+	+	++	0	-	+	0	0	0	0	-	-	+	0	++	0	+	+	0	++	0	0	0/+	+	0	0	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	23.5	
ET7. To reduce vulnerability to climatic events and increasing sea levels	++	--	-	0	0	0	-	-	-	+	++	0	-	0	0	0	+	++	0	0	++	0	0	++	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	7	
ET8. To conserve and enhance biodiversity	0	0	0	++	0	+	-	0	-	0/-	++	0	0	0	-	+	+	0	--	-	0	0	0/+	0	+	0	0	0	0	0	++	+	-/+	-	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	0	7.5	
ET9. To conserve and where appropriate enhance areas and sites of historical importance	0	+	+	++	0	0	-	+	+	0	++	0	+	0	-	0	+	0	0	-	0	0	0	0	+	0/-	0	++	+	0	0	0	0	-	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	14.5		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0	0	+	0	0	0	-	+	+	0/-	++	0	0	-	-	+	+	0	0	-	0	0	0	0	+	0/-	+	++	++	0	++	0/+	-	+	0	0	0	0	+	0	0/-	0/-	-	0	+	0	0	0	0	+	+	+	0	0	13.5
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	0	0	0	++	0	+	0	0	+	+	++	0	0	0	0	-	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	11.5			
HW1. To improve the health of those most in need	0	++	+	0	++	+	0	+	0	0	+	0	0	+	0	+	++	0	+/-	+	0	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	++	+	0	+	26	
HW2. To improve the quality of life where people live and encourage community participation	0	+	++	++	+	0	0	++	+	0/+	++	+	0	0	++	+	++	-	+/-	+	0	0	+	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	40.5		
ER1. To reduce poverty and social exclusion	0	+	+	0	+	+	0	+	+	0	+	++	++	+	+	0	+	-	0	0	0	0	0	0	+	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	--	0	0	0	17	
ER2. To offer everybody the opportunity for rewarding and satisfying employment	0	++	++	0	+	+	0	0/-	-	0	++	0	++	+	+	0	+	+	0	+	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0/+	18		
ER3. To help meet the housing requirements for the whole community	0	+	+	0	0	+	++	+	0	++	++	++	-	0	0	0	0	+	+	0	0	0/-	-	0	0	++	0	0	0	0/-	0/-	0/+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18	
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	0	+	+	0	0	+	0	0	0	0	0	0	++	+	+	0	+	+	0	+	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14.5		
ER5. To revitalise town centres	0	+	++	0	0	0	+	+	+	0	0	0	++	++	0	0	0	0	0	0	0	0	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	16.5	
ER6. To encourage efficient patterns of movement in support of economic growth	0	+	++	0	++	+	-	+	+	0	0	0	-	++	+	0	+	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15.5		
ER7. To encourage and accommodate both indigenous and inward investment	+	++	+	0	0	+	0	0	0	0	0	0	++	++	+	0	+	+	0	+	0/-	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18.5			
CL1. To maintain and improve access to education and skills for both young people and adults	0	++	++	0	0	0	0	0	0	0	0	0	+	0	++	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13			
CD1. To minimise potential opportunities for crime and anti-social activity	0	+	+/-	0	0	0	0	0	0	0	0	0	0	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8			
Total	10	19	24	17	15	13	-7	11.5	8	1	23.5	6	6	12	12	3	25	5	2	3	7.5	4	1	4	7	5.5	2.5	5	4	2.5	6	6	3	8	12	6	7	3.5	5	4	2.5	11	7	3	2	5	7.5	8.5	8	8	7	7.5	9.5	0	

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

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

### **8.2.2 Employment**

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

### **8.2.3 Transport**

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

### **8.2.4 Carbon emissions**

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

### **8.2.4 Housing**

In the short to medium term housing may be built in the flood zone which will be at risk until the flood barrier is in place in 2013.

## **8.3 Secondary**

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

### **8.3.2 Biodiversity**

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

### **8.3.3 Crime and anti-social behaviour**

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

### **8.3.4 Energy use**

For policy DC24 (loss of housing units), it is suggested that the demolition of housing units and rebuilding of new, different style may result in the average energy efficiency of homes being increased.

### **8.3.5 Health**

Several policies advocate economic growth for Ipswich. Together with improved education levels (policy CS15), this may have a secondary effect of improving the average health status of Ipswich residents, as those in employment tend to be more healthy both physically and mentally than those out of work. In contrast, policies which may hinder development (such as CS4) may have the opposite effect.

### **8.3.6 Inward investment**

Under the green infrastructure policy (CS16) , it is suggested that a greener or better designed environment may help to make Ipswich more attractive as an investment location. Similarly policies encouraging use of renewables and sustainable building, could stimulate new businesses.

### **8.3.7 Retail**

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

#### **8.3.8 Waste**

A serious concern with waste is the effect of an increased number of flats (high density building). Where there are shared recycling facilities, the system often breaks down because one out of 20 residents may put in the wrong sort of rubbish, resulting in the refuse collectors refusing to empty the bin and no-one being willing to take responsibility for the situation. In some cases bins can remain unemptied for months, meaning that residents have to put all their waste in the black bins. Flats also do not have brown bins, and therefore residents cannot send suitable kitchen waste for composting.

**8.3.9** Under Policy 13 (number of jobs), it is suggested that an increased number of businesses will make business waste recycling more economically viable, thereby increasing the possibilities for recycling, however there is no mention of waste and recycling in policies advocating development or outlining infrastructure contributions. Policy CS17 does however note that infrastructure delivery should consider waste management. Improving education levels of Ipswich residents (policy CS15, education provision) may also help to increase the recycling rate.

#### **8.3.10 Water quality**

A secondary effect of many policies which increase flood risk includes the potential risk to water quality.

### **8.4 Cumulative**

**8.4.1** The cumulative effects of the policies appear particularly strong on improving the quality of life where people live, water and air quality and improving access to services (highest scores in table 8.1).

**8.4.2** The weakest sustainability aspects stemming from the cumulative appraisal of the policies are for reducing waste, reducing vulnerability to climatic events and rising sea levels and enhancing biodiversity. The implications of this are considered in section 10.

### **8.5 Synergistic**

Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects can occur as habitats, resources or human communities get close to capacity. Possible synergistic effects that could occur in this plan could stem from a density of housing being achieved that triggers the provision of new services (e.g. doctors surgery, bus service, recycling scheme or combined heat and power scheme). In a sense this is planned for and anticipated in policy CS17 that seeks to establish residential and non residential planning gain tariffs.

### **8.6 Permanent and temporary**

**8.6.1** There are two main temporary effects of the options. The first of these relates to construction; as a significant amount of development is planned, this will result in the need for more construction workers in the area. This may result in an influx of migrant workers, which may affect community relations. The workers will require housing, though only until the construction has ended. Throughout the lifespan of this plan, several large developments in Suffolk are possible, including a potential indoor leisure park, as well as a new nuclear power station. Impacts from the construction of these developments could also exacerbate temporary problems identified above.

**8.6.2** A specific temporary effect of Policy 18 (strategic flood defence) is that until the tidal surge barrier is completed, flood risk will remain at its present level, or possibly worse due to the effects of climate change. In the long-term, risk should be significantly reduced by a barrier.

## 9. REPORTS ON POLICY COVERAGE

### 9.1 Range of policies in the plan document

The Council considered whether or not to include a wide array of policies within this document. The list below sets out the main policies which have been excluded from the final assessment of the Core Strategy.

#### Approach to mixed use development

It was considered that the issues in this policy are sufficiently covered within policy CS2.

#### The density of residential development

Issue covered in development control policies.

#### The Approach to a Non-Residential Planning Gain Tariff

Covered in policy CS13.

#### The Approach to Open Space

Open, recreational and leisure spaces are addressed in policy elsewhere.

#### Electricity Capacity

This was a stand-alone policy which has now been incorporated into CS17

#### Urban Design

This policy was considered, and then incorporated into policy CS2 and DC5

#### The A14

A policy appeared in the preferred options paper which outlined a strategy for the council's approach to the A14. It has since been considered that given that the road is not an asset of the borough council, and largely outside of borough, this was not a policy which warranted a place in the Ipswich Borough Council LDF.



## 10. LIST AND DESCRIPTION OF THE MITIGATION MEASURES

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

**10.1.1** This appraisal concentrates on assessing individual policies and sites that are set out within the Borough Council's Core Strategy DPD. In that context it is important to bear in mind the following three factors:

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

**10.1.2** The assessment of the relative sustainability of the policies and their options leads to 5 main recommendation (s):

1. Policy CS17: Delivering Infrastructure – Requires the addition of reference to waste management and waste recycling centres. It should be noted that in appendix 3 of the LDD, recycling is addressed, however this may have more prominence if placed in the policy wording.
2. Policy CS19: Provision of health services – Active support for the establishment of new GP surgeries should be included in the final core policy wording. This would strengthen the implementation of the plan in the longer term in achieving the outcome of increasing access to key services. The current policy seems to concentrate on site specific issues and hence does not have a longer policy view to deal with possibly currently unanticipated developments in the future. (Section 7.2 Policy CS19).
3. Policy DC21 District and Local Shopping centres – Similarly needs additional wording to clarify that public transport links should be provided, although this issue is mitigated through policy DC15.
4. Policy DC30: Provision of new open spaces – Add requirement for adequate space for laundry and open space to be within 400m of affordable housing if reduced open space provision is negotiated to ensure viability of the scheme.
5. Policy DC31: Density of Development – This policy scored negatively on issues surrounding crime and anti social activity, and this could be mitigated through altering wording to ensure that high density development will be planned with secure features, activities for young people and similar. An example of this is in DC5, where cycle storage facilities are expected to be secure.

Section 7.5 suggests a number of areas that need mitigation, some of which are achieved by the application in parallel of other policies. The following sets out common themes that need to be addressed in the final wording of the policies.

An addendum to this document will be published detailing changes made to the adopted version of the plan resulting from the SA process, in particular the findings of this document.

**10.1.3 Flood risk:** There is a need to include mention of the need for design sensitive to flood risk for properties in flood zones in the short to medium term before the tidal barrier is completed. This is however mitigated within policy CS18 which suggests a phasing for development in terms of ensuring that flood risk is alleviated prior to development.

**10.1.4 Waste management and recycling:** When planning for development, there is a need to ensure that adequate recycling points and waste centres are provided.

**10.1.5 Public Transport:** Whilst the plan is strong on planning development in areas which are easy to reach and encouraging cycling, there are opportunities to strengthen the plan through referring to public transport routes.

## **10.2 Proposed mitigation measures**

It is considered that the recommended changes in 9.1 will provide mitigation for most of the significant effects identified in this appraisal.

Other mitigation measures are discussed on a policy by policy basis in section 7.5.

## **10.3 Uncertainties and risks**

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

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



## **11. MONITORING MEASURES**

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

**11.1.1** Some of the indicators included in the SA Framework are associated with targets in other plans and programmes. The relationship to the Regional Spatial Strategy and Ipswich Community Strategy are mentioned in Plan. The SA framework seeks to reuse indicators where ever possible to reduce the burden of data collection. It particularly uses indicators that are statutory requirements for the RSS and LDFs. New targets have been agreed for the Suffolk Community Strategy that include some from the National Indicator Set that replaced the Best Value Performance Indicators in 2008/9. The SA indicators could be updated to reflect new measures introduced.

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

### **11.2 Proposals for monitoring**

**11.2.1** It is proposed that all of the indicators included in the SA framework (Appendix 2) are monitored. Particular attention needs to be given to the following to monitor the uncertainties identified in Table 8.1.

**11.2.3** For Policy CS20 where proposals for increased road capacity cannot be mitigated it is suggested that monitoring of traffic levels, congestion and air quality need to be undertaken.

**11.2.4** For Policy DC24 Loss of residential accommodation, the number of planning applications received, for what and the decision should be monitored to determine whether this policy is resulting in less economic development.

**11.2.5** Difficulties in the monitoring of some policies emerged, including CS1, where “significantly reduced carbon emissions” were aimed for. This should be quantified, preferably with a baseline and a target though which to monitor progress.

## 12. QUALITY ASSURANCE CHECKLIST

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

Quality Assurance checklist	Located in
<b>Objectives and context</b> <ul style="list-style-type: none"> <li>• The plans or programme's purpose and objectives are made clear.</li> <li>• Environmental issues and constraints, including international and EC environmental protection objectives, are considered in developing objectives and targets.</li> <li>• SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate.</li> <li>• Links with other related plans, programmes and policies are identified and explained.</li> <li>• Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described.</li> </ul>	<p>Section 6 Sections 4.1 / 5.1</p> <p>Appendix 2</p> <p>Section 5.1</p> <p>Section 8.1</p>
<b>Scoping</b> <ul style="list-style-type: none"> <li>• Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report.</li> <li>• The assessment focuses on significant issues.</li> <li>• Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.</li> <li>• Reasons are given for eliminating issues from further consideration.</li> </ul>	<p>Scoping Report</p> <p>Section 8 Section 3.6</p> <p>Section 9.1</p>
<b>Alternatives</b> <ul style="list-style-type: none"> <li>• Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.</li> <li>• Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant.</li> <li>• The environmental effects (both adverse and beneficial) of each alternative are identified and compared.</li> <li>• Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.</li> <li>• Reasons are given for selection or elimination of alternatives.</li> </ul>	<p>Section 7</p> <p>Section 7</p> <p>Section 8</p> <p>Section 8</p> <p>Section 9.1</p>
<b>Baseline information</b> <ul style="list-style-type: none"> <li>• Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described.</li> <li>• Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan.</li> <li>• Difficulties such as deficiencies in information or methods are explained.</li> </ul>	<p>Section 4</p> <p>Section 4</p> <p>Section 3.7</p>
<b>Prediction and evaluation of likely significant environmental effects</b> <ul style="list-style-type: none"> <li>• Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate.</li> <li>• Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed.</li> <li>• Likely secondary, cumulative and synergistic effects are identified where practicable.</li> </ul>	<p>Section 8</p> <p>Section 8</p> <p>Section 8</p>

<ul style="list-style-type: none"> <li>• Inter-relationships between effects are considered where practicable.</li> <li>• The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds.</li> <li>• Methods used to evaluate the effects are described.</li> </ul>	<p>Section 8 Section 8</p> <p>Section 3</p>
<p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>• Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.</li> <li>• Issues to be taken into account in project consents are identified.</li> </ul>	<p>Section 7.5</p> <p>Section 7.5</p>
<p><b>The Environmental Report</b></p> <ul style="list-style-type: none"> <li>• Is clear and concise in its layout and presentation.</li> <li>• Uses simple, clear language and avoids or explains technical terms.</li> <li>• Uses maps and other illustrations where appropriate.</li> <li>• Explains the methodology used.</li> <li>• Explains who was consulted and what methods of consultation were used.</li> <li>• Identifies sources of information, including expert judgement and matters of opinion.</li> <li>• Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA.</li> </ul>	<p>All sections All sections Section 4 Section 3 Section 3.4 Section 4</p> <p>Section 10</p>
<p><b>Consultation</b></p> <ul style="list-style-type: none"> <li>• The SEA is consulted on as an integral part of the plan-making process.</li> <li>• Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report.</li> </ul>	<p>The Proposed Submission Draft Core Strategy and Policies document, along with the SA report will be taken through a formal consultation process.</p>
<p><b>Decision-making and information on the decision</b></p> <ul style="list-style-type: none"> <li>• The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme.</li> <li>• An explanation is given of how they have been taken into account.</li> <li>• Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.</li> </ul>	<p>An addendum to this document will be produced detailing changes to the plan resulting from the SA process.</p>
<p><b>Monitoring measures</b></p> <ul style="list-style-type: none"> <li>• Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.</li> <li>• Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.</li> <li>• Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)</li> <li>• Proposals are made for action in response to significant adverse effects.</li> </ul>	<p>Section 11</p>

### **13. BIBLIOGRAPHY**

- A practical guide to the Strategic Environmental Assessment Directive (ODPM, September 2005)
- European Union Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes regulations 2004
- East of England Regional Spatial Strategy Habitat Directive Assessment (ERM, December 2006)
- Scoping report (Suffolk Sustainability Appraisal Group, 2006)
- Suffolk, Creating the Greenest County (Suffolk County Council Cabinet Report, 6 March 2007)
- Suffolk's Environment monitoring reports (Suffolk Sustainability Appraisal Group, 2001-5)
- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (DCLG, November 2005)
- Sustainability Baseline Data (Suffolk Sustainability Appraisal Group, 2006)
- Sustainability Framework (Suffolk Sustainability Appraisal Group, 2005)

## 14. GLOSSARY

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

# APPENDICES

## Appendix 1: Updated list of scoped documents

### International context

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

### National, Regional and Local Context

- UK Sustainable Development Strategy (March 2005)
- Sustainable Communities Plan: Building for the Future (2003)
- Planning Policy Statement 1: Delivering Sustainable Development
- PPG2 – Green Belts (Jan 95)
- PPG3 – Housing (March 2000)
- Government Consultation on a new Planning Policy Statement 3: Housing (December 2005)
- PPS4 – Draft, Planning for sustainable economic development (December 2007)
- PPG5 – Simplified Planning Zones (Nov 92)
- PPS6 – Planning for Town Centres (2005)
- PPG8 – Telecommunications
- PPS9 – Biodiversity and Geological Conservation (August 2005)
- PPS10 – Planning for Sustainable Waste Management (July 2005)
- PPS11 – Regional Spatial Strategies

- PPS12 – Local Spatial Planning (June 08)
- PPG13 – Transport (March 94) (Covered in RSS)
- PPG14 – Development on Unstable Land (April 90)
- PPG15 – Planning and the Historic Environment (Sept 94)
- PPG16 – Archaeology and Planning (Nov 90)
- PPG17 – Planning for Open Space, Sport and Recreation (July 02)
- PPS22 – Renewable Energy (Aug 04)
- Planning Policy Statement 23: Planning and Pollution Control (2004)
- PPG24 – Planning and Noise (Sept 94) (RSS)
- PPG25 – Development and Flood Risk (Dec 06) (RSS)
- Regional Spatial Strategy – RSS (adopted version May 08)
- RSS14 for the East of England SEA Scoping Report (17 September 2004)
- Government/Department of Transport: 10 Year Transport Plan 2000 (RSS)
- East of England Regional Transport Strategy (April 2003) (Incorporated as a chapter in RPG14) (RSS)
- East of England European Strategy 2003 – 2004, June 2003 (RSS)
- Towns and Cities Strategy and Action Plan, Urban Renaissance in the East of England (RSS)
- Towards Sustainable Construction – A Strategy for the East of England, Draft 2003 (RSS)
- Suffolk Local Transport Plan
- A Sustainable Development Framework for the East of England, October 2001 (RSS)
- Neighbouring Authority Plans and National Park Plans
  - Babergh Local Plan June 06
  - Mid Suffolk Core Strategy (September 2008)
  - Suffolk Coastal Local Plan, First alteration, February 2001
- Regional Social Strategy for the East of England, May 2004
- Health and Social Inclusion Strategy (EERA Health and Social Inclusion Panel) – Unable to find this but Regional Health Strategy Board is overseeing a project plan agreed in June 04 to produce a Regional Health Strategy – reporting to EERA via Health and social Inclusion Panel.
- Culture: a catalyst for change. A Strategy for Cultural Development for the East of England, Living East (June 2004)
- Suffolk Supporting People Five-Year Strategy 2005-2010 (August 2005)
- Suffolk Supporting People Five-Year Strategy 2005-2010 (August 2005)
- Regional Housing Strategy for the East of England 2005-2010 (July 2005)
- Affordable Housing Study: The Provision of Affordable Housing in the East of England 1996-2021, 2003 (RSS)
- Ipswich Housing Strategy Consultation Draft January 2006
- Ipswich Housing Study January 2005
- Everybody Matters: A Community Plan For Ipswich (2008-10)
- Draft Ipswich Cultural Strategy 2005

## **Environment**

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



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

## **Economic**

- Regional Economic Strategy for the East of England (2008)
- Expanding Suffolk's Horizons: Economic Strategy for Suffolk (2008)
- Prioritisation in the East of England, June 2003 (RSS)
- International Business Strategy, Consultation Draft, December 2003 (RSS)
- Regional Emphasis Document SR2004, December 2003 (RSS)
- Framework for Regional Employment and Skills Action (FRESA) (RSS)
- IBC Corporate Strategy – Transforming Ipswich
- The Ipswich Prospectus – growth for prosperity
- Ipswich Economic Development Strategy
- Area Investment Framework for Ipswich 2004
- IP-One Area Action Plan 2003
- Ipswich Retail Study 2005
- Planning Policy Statement 3- Housing (November 2006)
- Planning Policy Statement 25- Development and Flood Risk (December 2006)

## Appendix 2: SEA Framework

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

		ET8b Changes in extent of Natura 2000 sites		
		ET8c. Extent and condition of key habitats for which BAPS have been established		
	ET9. To conserve and, where appropriate, enhance areas of historical importance	ET9a. Risks to listed buildings, conservation areas and historic parks and gardens	No. of listed buildings and buildings at risk	DA
			Area (ha) of historic parks and gardens	DA
			No and area (ha) of Conservation Areas and Article 4 Directions	DA
			No. of Conservation Area Appraisals completed and enhancement schemes implemented	DA
		ET9b. Planning permissions adversely affecting known or potential designated assets (historic buildings, archaeological sites etc).		PL
	ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	ET10a. Percentage / No. of new dwellings completed / committed on brownfield land.	Percentage / No. of new dwellings completed on previously developed land	PL/ AMR
			Percentage of existing housing commitments on previously developed land	PL/ AMR
			No. of vacant dwellings	Empty Survey (latest 2004)
		ET8b. Area (ha) of designated landscapes – Area of Outstanding Natural Beauty (AONB)		DA
	ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	E11a. Percentage of SSSIs, SPAs and SACs in good condition		Natural England / Suffolk Wildlife Trust
	HW1. To improve the health of those most in need	HW1a. Proportion of population with access to hospital / GP / Dentist		(Take from AMR relating to ET6b above)
		HW1b. Proportion of journeys to work by foot or by bicycle		Census, employer surveys
		HW1c. How children travel to school (QOL / BVPI)		ND
	HW2. To improve the quality of life	HW2a. Play and open space quality, quantity and accessibility	Change in existing outdoor play space provision	UR
			Change in existing provision of childrens play space	UR

			Change in provision of open space	PL
		HW2b. Percentage of residents who are happy with their neighbourhood as a place to live		Suffolk Speaks
	ER1. To reduce poverty and social exclusion	ER1a. Proportion of population who live in wards that rank within the 10% most deprived in the country		Index of Multiple Deprivation
		ER1b. Provision of childcare	No. of neighbourhood nurseries available	ND
			No. of childcare places available	ND
	ER2. To offer everybody the opportunity for rewarding and satisfying employment	ER2a. Data relating to employment and economic activity in the area	Unemployment rate	Nimois/ census
			Long term unemployment (NOMIS) February 2005)	Nimois/ census
			Average earnings	Inland Revenue/ AMR
	ER3. To help meet the housing requirements for the whole community	ER3a. Data relating to housing including stock type, land availability and affordability	Homelessness	DA
			Housing Stock (SSAG)	DA
			Housing Land Availability	DA
			Affordable Housing	DA
			Housing Types and Sizes	Lack of data
			(links to ET2c: housing density)	
			Average property price to income ratio	DA
			No. of unfit houses per 1,000 dwellings (BVPI)	BVPI
		ER3b. Identify sites to meet RSS housing requirements		SPAR
	ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	ER4a. Planning consents for employment uses and take up of employment floorspace	Take up of employment floorspace	AMR
			Employment permissions and completions	PL/AMR
			Planning consents for B1, B2 and B8 uses	PL/AMR
		ER4b. Data relating to businesses and employment issues	No. / Percentage employed by employment division	ONS
			No./ Percentage businesses by main industry type	DA
			No. / Percentage employed by size (no. of employees)	DA
			No. / Percentage employed by industry type in key sectors	Borough Council
			Comparative industrial / office rental costs	DCLG town centre data/ estate
	ER5. To revitalise town centre		Percentage of town centre units with A1 uses	SPAR retail study data
			No. / Percentage of vacant retail units in town centres	SPAR retail study data

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

ND/? : No data/ Unclear where data will come from

PL: Planning Data

SDA: Suffolk Development Agency

SPAR: Part of monitoring work already carried out by SPAR

EA: Environment Agency

AMR: Part of work carried out on the IBC AMR

UR: Under Review

A/S: Data Available Soon

DA: Data available (though at source currently unclear)

SSAG: Suffolk Sustainability Appraisal Group



### Appendix 3: Sustainability Appraisal Tables

Policy CS1: Sustainable Development – Climate Change	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	++ Addresses water conservation	- No standard for env. Footprints may mean environment is damaged	+ Reducing traffic council improve air quality.	
ET2. To conserve soil resources and quality	+/- Considers development of council land which may be PDL			
ET3. To reduce waste	++ Focuses on renewables	- No standard for env. Footprints may mean environment is damaged		
ET4. To reduce the effects of traffic upon the environment	+ Aims to make development sustainable and reduce carbon footprint	- No standard for env. Footprints may mean environment is damaged		
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	++ Aims for a strong focus on low carbon developments (although lower than the 60% outlined by the Suffolk Community Strategy)	-- Lower standards for environmental footprint		
ET7. To reduce vulnerability to climatic events and increasing sea levels	++ Reflects importance of sea level and tidal rises and risk of flooding	-- Slower implementation of Ipswich flood defence strategy and poorer planning for water shortages		
ET8. To conserve and enhance biodiversity		- No standard for env. Footprints may mean environment is damaged		
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs		- No standard for env. Footprints may mean environment is damaged		
HW1. To improve the health of those most in need			+ Placing weight on environmental issues may reduce traffic, improving air quality and encouraging walking/cycling, which may improve health	
HW2. To improve the quality of life where people live and encourage community participation			+ Reducing traffic may improve quality of life for local residents	
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment			+ Potential development of renewable schemes on council owned land could provide local jobs	Short term jobs could be created, and a medium term boost to the economy and renewables sector.
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	+ Encourages investment in renewable energy on council land	- Less opportunities for investment		
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy CS2: The Location and Nature of Development</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Locating development at main shopping centres could reduce trip generation	-/+ Dispersal of development could reduce or increase congestion		
<b>ET2. To conserve soil resources and quality</b>	+ May result on greenfield land being used in the northern fringe, but encourages use of PDL at the former Cranes site.	0 Unknown impact		
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Locating development at main shopping centres could reduce trip generation/length	-/+ Dispersal of development could reduce or increase congestion		
<b>ET5. To improve access to key services for all sectors of the population</b>	++ Aims to locate development at service centres and increase % of people living there	-- Will not locate development near all sectors of population		
<b>ET6. To reduce contributions to climate change</b>				
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	-- May involve development in flood risk areas to south and west of town centre	- Development may be more dispersed		Short term increase in development in the flood zone.
<b>ET8. To conserve and enhance biodiversity</b>				
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+ Will encourage re-use of historic buildings in town centre			
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>				
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	++ Aims for open space/leisure areas to be dispersed throughout Ipswich; location near services mean people may walk/cycle rather than drive	- Dispersing leisure uses may encourage more car use		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Aims for open space to be dispersed throughout Ipswich			
<b>ER1. To reduce poverty and social exclusion</b>	+ Locating development at key service centres reduces exclusion	- Will not spread development		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	++ Encourages range of development uses and specifically ICT on major site			
<b>ER3. To help meet the housing requirements for the whole community</b>	+ Will spread development across town			
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Promotes range of development in town centre and Cranes site.	+ Allows spread of development		
<b>ER5. To revitalise town centres</b>	+ Aims to focus development in the town centre	- Allows dispersal of development		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Locating development at main shopping centres could reduce trip generation			
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	++Clear plan may encourage inward investment	-May not encourage development		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	++Flexibility to develop education buildings as required	-May hinder development of educational establishments	+Developing economy may improve skills	
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+ More leisure facilities may help reduce crime/anti-social activity			



<b>Core Strategy Policy CS3: IP-One Area Action Plan</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Locating development at main shopping centres could reduce trip generation	- Dispersal of education development could result in greater congestion		
<b>ET2. To conserve soil resources and quality</b>	++ Focussing development in Ip-One should maximise use of PDL	-Dispersed development could result in greenfield sites usage		
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	++ Locating development at main shopping centres could reduce trip generation/length, creating opportunities for efficient public transport	- Dispersal of development may generate more trips and may increase congestion		
<b>ET5. To improve access to key services for all sectors of the population</b>	++ Aims to locate development at service centres, policy CS2 seeks to locate people here	0/+ Dispersed development could place some services closer to some groups of the population		
<b>ET6. To reduce contributions to climate change</b>	+ Locating development at main shopping centres could reduce trip generation		Centralised development promotes better opportunities for renewable energy schemes	
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	-Unless flood defence barrier policy is implemented, flood risk is an issue	+ Less vulnerability if development is not concentrated in one place		
<b>ET8. To conserve and enhance biodiversity</b>		- More dispersed development could impact biodiversity at a wider scale		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+ Defines and appraises conservation areas			
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Defines and appraises quality of conservation areas	- More dispersed development, and development in outskirts of borough could altar landscapes		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+ Open space and community facilities addressed in policy	0/- Could result in less open space and community facilities		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	++ Seeks to identify areas where change will e concentration but not clear in sort of place seeking to create. Also addresses need for community facilities	- No sense of place will discourage investment		
<b>ER1. To reduce poverty and social exclusion</b>	+ Locating development at key service centres reduces exclusion			
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	++ Development could create jobs / Focuses on education quarter	- Lack of clear plan could deter investment		In short term, allocations may be inflexible
<b>ER3. To help meet the housing requirements for the whole community</b>	+Development could include provision of housing	+ Development could include provision of housing		In short term, allocations may be inflexible
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Seeks to plan for growth	- Lack of clear plan could deter investment		
<b>ER5. To revitalise town centres</b>	++ Seeks to develop central Ipswich	0/- Effect wouldn't be as strong without a policy concentrating on town centres		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	++ Allocation of sites	- Dispersed growth could lead to inefficient patterns of movement		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Clear plan could encourage growth	- No sense of place will discourage investment		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	++ Safeguards education sector, promoting future development of university	- Does not safeguard education centre, may take longer for further developments to be secured		
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+/-	- Lack of plan could lead to concentration of crime issues near centralised leisure facilities.		

<b>Core Strategy Policy CS4: Protecting Our Assets</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality	++ Addresses geological conservation	- Geological sites not as strongly protected		
ET3. To reduce waste	++ Use of recycled materials and waste reduction sought	- There may be increased waste produced		
ET4. To reduce the effects of traffic upon the environment	++ Use of local recycled materials reduces mileage. Safe urban layout	-Buying from further afield increases mileage		
ET5. To improve access to key services for all sectors of the population	++ Integration of residential, employment and community sites could improve access to services			
ET6. To reduce contributions to climate change	+Use of renewables encouraged	-Low carbon materials may be used		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	++ Recognises importance of nature/wildlife designations	- More scope for damage / loss		
ET9. To conserve and where appropriate enhance areas and sites of historical importance	++ Seeks to develop a policy for conservation areas	- More scope for damage		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		- More scope for damage		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	++ Recognises importance of nature/wildlife designations	- More scope for damage		
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	++ Protects and enhances green space			
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment			+Local jobs could increase as a result of using more local materials.	
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area			+Local builders and material suppliers may benefit	
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults			+ Could promote continuity which benefits education	
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy CS5: Improving Accessibility</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	++ Should help discourage car use and decrease emissions	-- Car use may increase		
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	++ More cycling and walking should reduce traffic	-- Car use may increase		
ET5. To improve access to key services for all sectors of the population	++ Locating development in easy to access places should increase accessibility			
ET6. To reduce contributions to climate change	++ Should help discourage car use and decrease emissions	-- Car use may increase		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	++ Cycling and walking should improve health, as should cleaner air	--- Less healthy activities and poor air quality		
HW2. To improve the quality of life where people live and encourage community participation	+ Easier access to community services			
ER1. To reduce poverty and social exclusion	+ Easier to access interaction hubs			
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+ Easier and cheaper to access workplaces			
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth	++ Movement should be efficient			
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
+ +CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy CS6: IPA</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Joint working may help locate key services/housing in a way that reduces traffic	0/- Not working effectively with all stakeholders could hinder traffic management		
<b>ET2. To conserve soil resources and quality</b>	+ Joint working may allow PDL to be used in preference to greenfield	0/- Will be harder to conserve effectively.		
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Joint working may help locate key services/housing in a way that reduces traffic	0/- Not working effectively with all stakeholders could hinder traffic management		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Joint working may help locate key services/housing to meets needs of people living in border areas			
<b>ET6. To reduce contributions to climate change</b>				
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>	+ Joint working for green infrastructure could assist protection of biodiversity	0/- Will be harder to conserve effectively.		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>				
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>				
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	+ Joint working will help ensure designated areas are protected	- Will need to work well with various organisations		
<b>HW1. To improve the health of those most in need</b>	+ Joint working may help locate key services/housing in a way that encourages walking/cycling	-Will need to work well with PCT		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>				
<b>ER1. To reduce poverty and social exclusion</b>	+ Joint working may help locate key services/housing to meets needs of people living in border areas	- Will need to work well with Suffolk Police		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Joint working may help co-locate housing and employment	0/- Will be harder to co-locate housing and employment		
<b>ER3. To help meet the housing requirements for the whole community</b>	+ Join working will help ensure housing sties are allocation			
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Working together could draw on expertise to attract investment	0/- Working together will draw on expertise to attract investment		
<b>ER5. To revitalise town centres</b>				
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Joint working may help locate key services/housing in a way that reduces traffic	0/- Not working effectively with all stakeholders could hinder traffic management		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Working together could draw on expertise to attract investment			
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>		- Will need to work well with Suffolk Police		

Core Strategy Policy CS7: Amount of housing	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	- More housing will generate more traffic	- No policy could result in extrapolation of previous trend – lower number f houses in total.		
ET2. To conserve soil resources and quality	- May require greenfield land			
ET3. To reduce waste	- More housing means more waste			
ET4. To reduce the effects of traffic upon the environment	- More housing will generate more traffic			
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	- More housing will use more energy			
ET7. To reduce vulnerability to climatic events and increasing sea levels	- May be built on flood zones		Could result in water quality worsening through urban flooding	Short term housing could be built in flood zone
ET8. To conserve and enhance biodiversity	- May be built on wildlife sites			
ET9. To conserve and where appropriate enhance areas and sites of historical importance	- May be built on archaeological sites			
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	- Large amounts of new housing may damage townscape			
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	++ Aims for 5,250 dwellings between 2008 and 2021, and 3,320 between 2021 and 2025.			
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres	+ Increasing population of town may boost town centre			
ER6. To encourage efficient patterns of movement in support of economic growth	- More housing will generate more traffic			
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy CS8: House/flat balance</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Higher density of housing around service centres may reduce trip generation			
<b>ET2. To conserve soil resources and quality</b>	+ Higher density of housing conserves soil resources	0/- Imbalanced housing supply could lead to over-use of land in some areas		
<b>ET3. To reduce waste</b>			-- Recycling levels are lower in flats due to bins not being emptied as some residents may put in wrong stuff and they do not have brown bins	
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Higher density of housing around service centres may reduce trip generation			
<b>ET5. To improve access to key services for all sectors of the population</b>	+/- Aims for higher density of housing around service centres, but could expedite housing delivery before services are available.			
<b>ET6. To reduce contributions to climate change</b>	+ Combined Heat & Power schemes are more viable in high density developments			
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	- May result in houses being built in flood risk areas; flats may be preferable if ground floor is uninhabited			Short term housing could be built in flood risk areas
<b>ET8. To conserve and enhance biodiversity</b>				
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+ Will make exceptions if site location and characteristics justify different approach	0/- Delivering unsuitable houses in some areas could damage areas of importance		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Lower density in surrounding areas should help preserve landscapes	0/- Delivering unsuitable houses in some areas could damage areas of importance		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+ Higher density of housing around service centres may mean more can walk/cycle			
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	++ Aims for mix of dwelling types that will help create balance communities	0/- Placing flats near houses and vice versa could imbalance communities		
<b>ER1. To reduce poverty and social exclusion</b>	+ Aims for higher density of housing around service centres and mix of dwelling types	0/- Placing flats near houses and vice versa could imbalance communities		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	0/- Could allow expedited housing growth before jobs are available.			
<b>ER3. To help meet the housing requirements for the whole community</b>	+ Aims to provide a mix of housing	++ May be able to better provide for the housing requirements of the community		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>				
<b>ER5. To revitalise town centres</b>	+ High density of housing around town centre may help revitalisation efforts			
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Higher density of housing around service centres may reduce trip generation			
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

<b>Core Strategy Policy CS9: PDL target</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ PDL is likely to be closer to existing services than new greenfield sites, reducing trip generation	0/+ Would be covered by PPS3 although 60% instead of 70%		
<b>ET2. To conserve soil resources and quality</b>	+ Aims for higher than guided use of PDL (70%)	0/+ Would be covered by PPS3 although 60% instead of 70%		
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ PDL is likely to be closer to existing services than new greenfield sites, reducing trip generation	0/+ Would be covered by PPS3 although 60% instead of 70%		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ PDL is likely to be closer to existing services than new greenfield sites	0/+ Would be covered by PPS3 although 60% instead of 70%		
<b>ET6. To reduce contributions to climate change</b>				
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	- Much PDL may be in flood risk zones	0/+ Would be covered by PPS3 although 60% instead of 70%		
<b>ET8. To conserve and enhance biodiversity</b>	- Building on PDL may harm biodiversity	0/- Would be covered by PPS3 although 60% instead of 70%		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+ Building on PDL may enhance sites of historical importance if they are currently run down	0/+ Would be covered by PPS3 although 60% instead of 70%		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Building on PDL may enhance townscape if it are currently run down	0/+ Would be covered by PPS3 although 60% instead of 70%		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	+ Using PDL reduces need for new development on/near protected sites	0/+ Would be covered by PPS3 although 60% instead of 70%		
<b>HW1. To improve the health of those most in need</b>				
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Developing on PDL may improve currently run down areas	0/+ Would be covered by PPS3 although 60% instead of 70%		
<b>ER1. To reduce poverty and social exclusion</b>	+ PDL is likely to be closer to existing services than new greenfield sites	0/+ Would be covered by PPS3 although 60% instead of 70%		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	- Use of PDL employment land for housing could result			
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>				
<b>ER5. To revitalise town centres</b>	+ May use PDL in town centre, improving its vitality	0/+ Would be covered by PPS3 although 60% instead of 70%		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ PDL is likely to be closer to existing services than new greenfield sites, reducing trip generation	0/+ Would be covered by PPS3 although 60% instead of 70%		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

Core Strategy Policy CS10: Ipswich Northern Fringe	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	+/- May attract more traffic to the northern fringe of Ipswich, however proximity to Westerfield station by walking and cycling addressed			
ET2. To conserve soil resources and quality	-- Use of greenfield land for development	0 Greenfield sites could be allocated elsewhere		
ET3. To reduce waste	0/- Housing development will increase waste			
ET4. To reduce the effects of traffic upon the environment	+/- May attract more traffic to the northern fringe of Ipswich, however proximity to Westerfield station by walking and cycling addressed			
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels	+ Sites unlikely to be in flood risk areas			
ET8. To conserve and enhance biodiversity	0/- Greenfield land development could result in biodiversity lost			
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0/- Landscape of northern fringe could change	+ Landscape of northern fringe maintained		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	+ Sites likely to be away from designated areas			
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	0/+ Infrastructure charges addressed in policy			
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	++ Provides housing growth	- Less housing likely to be delivered		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				



<b>Core Strategy Policy CS11: Gypsies &amp; travellers</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Drainage addressed	-Pollution of water could be a possibility		
<b>ET2. To conserve soil resources and quality</b>	+ Prioritises use of PDL	- Potential use of greenfield land		
<b>ET3. To reduce waste</b>	--+ Considers disposal from sites.	- Waste could be an issue from sites		
<b>ET4. To reduce the effects of traffic upon the environment</b>	0/+ Sites will be close to the trunk road network	- More travel may be required		
<b>ET5. To improve access to key services for all sectors of the population</b>	++ Accessibility and proximity to services addressed in policy	- Sites may be poorly located in relation to services		
<b>ET6. To reduce contributions to climate change</b>				
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	++ Encourages use of land free from flood risk	- Flood risk areas may be occupied.		
<b>ET8. To conserve and enhance biodiversity</b>	++ Policy seeks to minimise impacts on conservation	0/- Poorly designed sites could impact conservation		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	++Policy outlines need to preserve areas	0/- Poorly designed sites could impact conservation		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	++Policy outlines need to preserve areas	0/- Poorly designed sites could impact conservation		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	++Policy outlines need to preserve areas	0/- Poorly designed sites could impact conservation		
<b>HW1. To improve the health of those most in need</b>	+ Sites will be free of contamination	- Sites may be dangerous to inhabit		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	++Cohesion addressed in policy	- Poorly positioned sites can lead to community issues		In the long term, addressing this issue may aid cohesion
<b>ER1. To reduce poverty and social exclusion</b>	+ Aims to support proposals for travellers sites	++ Would allocate more sites for travellers		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	++ Considers need for land for business activities	- Businesses activities could be restricted.		
<b>ER3. To help meet the housing requirements for the whole community</b>	++ Aims to support proposals for travellers sites			
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>				
<b>ER5. To revitalise town centres</b>				
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>				
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>		- Poorly positioned sites can lead to community issues		In the long term, providing good quality gypsy traveller accommodation may reduce anti social activity

Core Strategy Policy CS12: Affordable Housing	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality	+ Encourages use of PDL by requiring more affordable housing on brownfield.	- Encourages use of greenfield land by not promoting use of PDL		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	+ Seeks to provide balanced communities			
ER1. To reduce poverty and social exclusion	++ Provides affordable housing and rented accommodation	- May provide lower levels of affordable housing		
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	++ Provides affordable housing and rented accommodation	- May provide lower levels of affordable housing		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy CS13: Planning for Jobs Growth</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	- More jobs may mean more traffic			
<b>ET2. To conserve soil resources and quality</b>	+ PDL will be allocated	- Greenfield might be developed		
<b>ET3. To reduce waste</b>	- More economic activity may increase waste		+ Increasing number of businesses may make business waste disposal more economically viable	
<b>ET4. To reduce the effects of traffic upon the environment</b>	- More jobs may mean more traffic			
<b>ET5. To improve access to key services for all sectors of the population</b>				
<b>ET6. To reduce contributions to climate change</b>	- More economic activity may mean more energy use	+ Less energy used		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	- Allocations will be made in flood risk areas			Short term allocations in flood risk area
<b>ET8. To conserve and enhance biodiversity</b>				
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+Allocations of employment sites will help protect historic heritage			
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>		- Incremental change could damage townscape		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>			+ Increased employment may improve health	
<b>HW2. To improve the quality of life where people live and encourage community participation</b>		-Fewer jobs could lead to poverty	- Inward migration of workers my impact community cohesion	
<b>ER1. To reduce poverty and social exclusion</b>	++ Aims for 18,000 jobs	-Fewer jobs could lead to poverty		Long term uncertainty beyond 2021
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	++ Aims for 18,000 jobs	-Fewer jobs could increase unemployment		
<b>ER3. To help meet the housing requirements for the whole community</b>	- A large increase in jobs may result in housing shortages	+More land could be used for housing		Long term uncertainty of jobs provided beyond 2021
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	++ Aims for 18,000 jobs	--Will limit growth		
<b>ER5. To revitalise town centres</b>	++ More jobs to be placed in town centre through the Ip-One plan	-Fewer jobs created to revitalise town centre	+ An increase in jobs may boost population, increasing the town centre's customer base	
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	- More jobs may mean more traffic			
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	++ Policy aims to market Ipswich	--Ipswich will not be promoted as much		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	+ Supports growth of university and college		? Depending on type of new jobs, may make training more accessible	
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>		- Fewer jobs could lead to increased crime	+ Increased employment may reduce crime	

<b>Core Strategy Policy CS14: Retail Development</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	++ Town centre development is preferred to out-of-town sites and supports improvements of local district centres	-- More out-of-town developments, leading to increase in traffic		
<b>ET2. To conserve soil resources and quality</b>	++ Encourages development of existing town centre	--More dispersed development could lead to use of greenfield, or take PDL from other employment uses		
<b>ET3. To reduce waste</b>	-More development will mean more waste	- More development will still be likely		
<b>ET4. To reduce the effects of traffic upon the environment</b>	++ Town centre development is preferred to out-of-town sites and supports improvements of local district centres	-- Supports out-of-town developments, leading to increase in traffic		
<b>ET5. To improve access to key services for all sectors of the population</b>	- Lack of development in local district centres	-Facilities will not be in one central accessible area		
<b>ET6. To reduce contributions to climate change</b>	-More development will mean more energy use	- More development will still be likely		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	0	-Flood risk could still be an issue		
<b>ET8. To conserve and enhance biodiversity</b>				
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>				
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	- Could alter townscapes incrementally in town centre conservation areas	- Out of town development could threaten views		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+Shops will be accessible by cycle, foot and public transport		+ Improved local economy may improve health of local residents	
<b>HW2. To improve the quality of life where people live and encourage community participation</b>				
<b>ER1. To reduce poverty and social exclusion</b>	+ Aiming to improve Ipswich as a retail centre may stop people shopping elsewhere and boost local economy			
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Aiming to improve Ipswich as a retail centre may stop people shopping elsewhere and boost local economy			
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Aiming to improve Ipswich as a retail centre may stop people shopping elsewhere and boost local economy			
<b>ER5. To revitalise town centres</b>	++ Aims to protect and improve the town centre	-- Supporting out-of-town developments may damage town centre		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	++ Town centre development is preferred to out-of-town sites and supports improvements of local district centres	-- Supports out-of-town developments, leading to increase in traffic		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	++ Recognises that there are suitable sites in Ipswich centre for development, and mentions promoting Ipswich	+ More scope for transformational change in Ipswich		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>			+ Improved local economy may reduce crime rate	

<b>Core Strategy Policy CS15: Education Provision</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Recognises importance of sustainable location, and access via walking and cycling.			
<b>ET2. To conserve soil resources and quality</b>	+/- Educational development will be on PDL, but new sixth form centre will be built on greenfield land			
<b>ET3. To reduce waste</b>			+ Improved education levels increase recycling rate	Long term traffic congestion to 6 <sup>th</sup> form centre
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Recognises importance of sustainable location, and access via walking and cycling.			
<b>ET5. To improve access to key services for all sectors of the population</b>	++ Policy aims to increase access to education services	--Lesser access to education facilities		
<b>ET6. To reduce contributions to climate change</b>	+ Building schools for the future refurbishments may reduce energy use			
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>	- New sixth form centre may damage protected species			
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	- New sixth form centre may damage archaeological site			
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	-New sixth form centre is on greenfield land			
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>			+ Increased education levels improve health	
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	++ Recognises importance of nursery and children centre provision, as well as legacy of sites and community facilities	- Fewer community facilities available	+ Increased education levels improve community participation	
<b>ER1. To reduce poverty and social exclusion</b>	+ Better education offers better employment opportunities	- Skills levels could lower, increasing chance of poverty		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Better education offers better employment opportunities	- Skills levels could lower, increasing chance of unemployment		
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Improved education will benefit local economy			
<b>ER5. To revitalise town centres</b>				
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Recognises importance of sustainable location, and access via walking and cycling.			
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Improved education of local population will increase attractiveness for investors	- Skills levels could lower, decreasing chance of investment		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	++ Supports development of Suffolk New College, UCS and new sixth form centre	-- Skills levels could decrease		
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+ Improved education may reduce crime/anti-social activity rate			

<b>Core Strategy Policy CS16: Green Infrastructure, Sport and Recreation</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	+ More green space could improve air quality	-No controls, allowing denser development could worsen air quality		
ET2. To conserve soil resources and quality	- Requirement may result in more land being needed for sport and recreation development	+ Would reduce amount of land needed for development		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	+ Requires development s to provide public green space	- Limited new green space created and managed		
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Public space could enhance townscape	- May reduce greenspace in townscape		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	- Potential impacts on Orwell SPA. AA would need to consider this.			Long term impacts of facilities on SPA need to be considered in AA
HW1. To improve the health of those most in need	+ Requires developments to provide public green space and encourages shared use of school sites.	- Less new green space created		
HW2. To improve the quality of life where people live and encourage community participation	+ Requires developments to provide public green space	- Less new green space created		
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy CS17: Delivering Infrastructure</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	++ Requires on-site services in developments, reducing trip generation	- Services could be located further afield, needing more travel		
<b>ET2. To conserve soil resources and quality</b>				
<b>ET3. To reduce waste</b>	+ Considered in policy			
<b>ET4. To reduce the effects of traffic upon the environment</b>	++ Requires on-site services in developments, reducing trip generation	- Services could be located further afield, needing more travel		Short term compromise on infrastructure if viability is an issue
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Requires on-site services in developments, not clear if covers meeting places.	- Services may not be located close to development		
<b>ET6. To reduce contributions to climate change</b>	++ Less travel and emissions if services are located on site. Also addresses sustainable transport.	- Services could be located further afield, needing more travel		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	+ Considers flood defence needs			
<b>ET8. To conserve and enhance biodiversity</b>	+ Considers green infrastructure needs which could help conservation	- Less money for conservation activities		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+ May provide support for conservation			
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Considers green infrastructure needs which could help conservation	- Less money for conservation activities		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	+ Considers green infrastructure needs which could help conservation	- Less money for conservation activities		
<b>HW1. To improve the health of those most in need</b>	++ Requires on-site services in developments, encouraging walking/cycling and allows for open space, sport/recreation provision	- Healthcare may not be located as close to development		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	++ Allows for open space provision and funds for communities and culture, not clear if it covers meeting places	- Less funds for community facilities		Short term suggests to compromise on infrastructure if viability is an issue. This could negatively impact upon quality of life.
<b>ER1. To reduce poverty and social exclusion</b>	+ Require on-site services in most developments	- Less access to community facilities		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Provides funding for service development	- Less money for service development		
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Provides funding for service development	- Less money for service development		
<b>ER5. To revitalise town centres</b>				
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Require on-site services in developments, reducing trip generation	- Services could be located further afield, needing more travel		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Provides funding for service development	- Less money for service development		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	++ Require on-site education facilities in developments and provides funds for education	- Less money available for educational development		
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	+ May provide funding for crime prevention	- Less funding for crime prevention		

<b>Core Strategy Policy CS18: Strategic Flood Defence</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality	+ Enables use of PDL in floodplain in the short-term	- May mean greenfield land is needed to replace land lost to flood risk zones		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels	++ Recognises importance of flood defence strategy and aims for tidal surge barrier	- May ignore risk of flooding	(1) + Encourages innovative design to deal with flood risk	
ET8. To conserve and enhance biodiversity		- Flooding could destroy some biodiversity		
ET9. To conserve and where appropriate enhance areas and sites of historical importance		- Flooding could destroy sites		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs			-Barrier may affect SAC downstream	
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	- Possible fear of flooding if development goes ahead without barrier	- Possible fear of flooding if development goes ahead without barrier	- Cumulative effect of worsening flood risk made by increased amount of housing in flood plain	
ER1. To reduce poverty and social exclusion	- Endangers residents to flooding and loss of value of home	- Flood risk puts people and property at risk and has insurance issues		
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+ Enables development of employment land in flood zone			
ER3. To help meet the housing requirements for the whole community	+ Enables development for housing	- Makes less land available for housing		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Land in flood risk zone may be available for development			
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	+Recognises importance of protecting Ipswich	- Flood risk may act as disincentive		
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity		- Being unable to develop land may lead to more anti-social activity		



<b>Core Strategy Policy CS19: Provision of Health Services</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	? Concern near hospital, but travel plan could help control			Long term emissions problems could result in a hotspot around Heath Rd. travel plans would need to be updated and adapted
<b>ET2. To conserve soil resources and quality</b>	+ St Clements being made available for development may reduce need for greenfield land			
<b>ET3. To reduce waste</b>	- More facilities will increase waste			
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Heath Road is well served by public transport	- More travel may be required if services are not strategically located		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ St Clements site has key services nearby for new housing. Locating GP surgeries centrally improves accessibility	- Services may be less accessible if they are dispersed with a lack of planning		
<b>ET6. To reduce contributions to climate change</b>	+ Access and transport are addressed in policy	- Increased traffic is possible from badly planned services		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>	-- May disturb habitat of protected species and result in loss of greenspace			
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>				
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>				
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+/- Provides integrated mental and physical health facilities, but may result in greenspace being developed	-- Health service provision could suffer		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+/- Seeks to protect community facilities but greenspace could be lost	-- Could result in loss of community services		
<b>ER1. To reduce poverty and social exclusion</b>				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>				
<b>ER3. To help meet the housing requirements for the whole community</b>	+ St Clements site may be available for development for housing			
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>				
<b>ER5. To revitalise town centres</b>				
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>				
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

<b>Core Strategy Policy CS20: East-West Transport Capacity</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+/- Seeks to relieve air quality issues but discusses road building	- Air quality issues will not improve as traffic increases		
<b>ET2. To conserve soil resources and quality</b>	+ Promotes access to island site			
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	- Supports more road building, though also supports improvements to bus provision	- Air quality issues will not improve as traffic increases		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Transport provision and planning should improve access to town centre for Waterfront residents	- Access could suffer		
<b>ET6. To reduce contributions to climate change</b>	+ Better bus and pedestrian links may decrease car usage	- No policy could increase car use		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>	- Wet Dock crossing may damage wildlife site			
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	- Wet Dock crossing may damage Conservation Area			
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	- Wet Dock crossing may damage townscape			
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+ Linking green routes could encourage walking and cycling			- Building can cause air pollution in the short term
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Seeks to improve air quality in gyratory			-Wet dock construction could cause disturbance in the short term
<b>ER1. To reduce poverty and social exclusion</b>				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Improved road links may improve attractiveness to investment	- Poor transport links could hinder job access		+ Construction jobs could increase in the short term
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Improved road links may improve attractiveness to investment			
<b>ER5. To revitalise town centres</b>		- Access to the town centre could be limited		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	- Supports more road building, though also supports improvements to bus provision			
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Improved road links may improve attractiveness to investment	- Poor transport links could hinder investment		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>		- Access to education facilities may not be as strong		
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

Core Strategy Policy DC1: Sustainable Development	Policy	“Do Nothing” Alternative – Set no standards	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	++ Ensures development will not increase emissions and addresses water quality in justification	-- No co-ordinated action to seek to reduce energy use		
ET2. To conserve soil resources and quality				
ET3. To reduce waste	++ BREEAM addresses site waste			
ET4. To reduce the effects of traffic upon the environment	+ Aims to reduce the need for travel	- Less consistent approach to sustainable transport provision		
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	++ Aims to meet BREEAM standard	-- No co-ordinated action to seek to reduce energy use		Do nothing: Long term legacy of establishments not meeting targets
ET7. To reduce vulnerability to climatic events and increasing sea levels	++ Addressed in policy justification	- Weaker policy on decreasing vulnerability to climatic vents		In the long term, reducing carbon emissions will reduce vulnerability to climatic events
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	0/- Potential to discourage developers		++ No standard could encourage inward investment	Do nothing: Long term legacy of establishments not meeting targets
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC2: Decentralised renewable or low carbon economy</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – No requirement to provide energy from renewable source</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	+ Fewer emissions if energy comes from renewable sources			
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	++ More energy use from renewables unless demonstrable that this is not feasible	-- Lower target for energy from renewables would lead to more energy usage from polluting sources		Policy: Long term will contribute to 60% reduction of carbon by 2025.
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment	0/+ Could lead to more jobs in the renewables sector			
ER3. To help meet the housing requirements for the whole community	0/- May limit housing delivery			
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	0/+ Could help grow the key renewable sector			
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	0/+ Could help grow the key renewable sector			
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC3: Private outdoor amenity space in new developments</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – No stipulation of minimum requirements</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality	+/- Developments will use more land, but more land will be green spaces	- Denser housing likely to ensue		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels		- More un off could contribute to flash flooding		
ET8. To conserve and enhance biodiversity	0/+ More green space	- More concrete areas		
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	0/+ Access to green space could improve health			
HW2. To improve the quality of life where people live and encourage community participation	+ Quality of surroundings should increase			
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	-Less space available for homes	+ More land available for house building		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

Core Strategy Policy DC4: SUDS	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	++ Water conservation and management, quality drainage systems.	- Flooding could lead to water pollution		
ET2. To conserve soil resources and quality	+/- Open space may be flooded, but this unlikely to affect soil quality in an urban area	- Flooding could lead to soil pollution		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels	++ Vulnerability to flooding decreased			
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance		- Flooding could damage sites		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		- Flooding could damage townscapes		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs		- Flooding could damage protected areas		
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment		- Flood risk may put off investment		
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

Core Strategy Policy DC5: Urban Design Quality	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	0 Not addressed in policy			
ET2. To conserve soil resources and quality	0/+ Considers urban greening			
ET3. To reduce waste	? Waste bins addressed, should refer specifically to recycling bins and centres			
ET4. To reduce the effects of traffic upon the environment	0/+ Provides car parking but also provides cycle storage			
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	0/+ Notes sustainable buildings			
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	+ Biodiversity addressed in policy			
ET9. To conserve and where appropriate enhance areas and sites of historical importance	+ Addressed in policy	- Areas could be developed to a less quality		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Addressed in policy	- Areas could be developed to a less quality		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	+ Aims to create a sense of place	0/- Development without a sense of place may hinder cohesion		
ER1. To reduce poverty and social exclusion	+ Sense of place could alleviate social exclusion			
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres	0/+ High quality building in urban areas could mean town centre is revitalised			
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity		0/- Development without a sense of place may increase crime		

Core Strategy Policy DC6: Tall Buildings	Policy	“Do Nothing” Alternative – No control of location	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	+ Microclimate addressed			
ET2. To conserve soil resources and quality	0/+ Tall buildings yield more dwellings per hectare	- More land will have to be used		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	0/+ Relationship to transport infrastructure addressed	- Could generate lots of traffic in what was a quiet area		
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	+ Sustainable design sought			
ET7. To reduce vulnerability to climatic events and increasing sea levels	+Sustainable design sought which could minimise impacts of runoff.			
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance	0/- Likely to altar character of areas, although this is addressed in policy	- Possible impact of buildings on a wide are		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0/- Likely to altar character of areas, although this is addressed in policy	- Possible impact of buildings on a wide are		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	++ Provides housing			
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres	0/+ Could help to revitalise town centres			
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				



Core Strategy Policy DC7: Public Art	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Should help increase local distinctiveness			
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	+ Local identity and participation could increase			
ER1. To reduce poverty and social exclusion	0/+ A more inclusive community could result		+ By creating more local identity, more inclusiveness may result	
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

Core Strategy Policy DC8: Conservation Areas	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	+ Conservation Areas often close to AQMA in Ipswich			
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance	++ Many listed buildings are in conservation areas and are highlighted	-- Listed buildings may suffer with lack of policy		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++ Conservation Areas will be protected	-- Conservation areas may suffer		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment			+ Well managed Conservation Areas could be attractive to investors	
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC9: Buildings of townscape interest</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality	+ Retention and repair of existing greenfield buildings could lead to less use of PDL	- More greenfield sites could be used		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance	+ Retained buildings could be of local importance	-- Historical areas could be redeveloped		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++ Aims to retain and repair buildings of townscape interest	-- Townscapes could be changed through new build		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

Core Strategy Policy DC10: The Protection of Trees	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	0/+ Preserving trees could improve air quality			
ET2. To conserve soil resources and quality	0/+ More trees should improve soil resources			
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	0/+ Preserving trees could improve air quality			
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	++ More habitats for species			
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	0 These areas are protected through other policy			
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment	0/- Could reduce the amount of land for employment use			
ER3. To help meet the housing requirements for the whole community	0/- Could reduce the amount of land for housing use			
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC11: The Ipswich Skyline</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	0/+ Protecting woodland should help maintain air quality standards			
ET2. To conserve soil resources and quality	+ Aims to protect green area around Ipswich fringe,	-- Wooded Ipswich fringe could be developed		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	+ Maintaining woodland should help protect biodiversity	-- Wooded areas could be lost		
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++ Landscapes maintained	-- Landscapes could be altered		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	+ Much of the eastern area of Ipswich is designated	-- Could harm designated areas		
HW1. To improve the health of those most in need	0/+ Access to woodland around the Ipswich fringe could improve health	- Less access to open or recreational space		
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	0/- Could reduce the amount of land available for housing	+ More land easily available for housing		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres	0/+ More development will be placed in the town centre rather than the fringes of the town	- Development could be more dispersed		
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

Core Strategy Policy DC12: Extensions	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	++ Drainage standard to be improved			
ET2. To conserve soil resources and quality	+ Green space to be retained	- Could consume green spaces		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	-/+ green space mentioned in policy, but no direct biodiversity comment	- Loss of green space and biodiversity		
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0/+ Seeks to avoid changes to the character of areas			
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	++ Addresses need to be sympathetic to neighbours			
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	0/+ Allows housing to be extended			
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC13: Small scale infill</b>	<b>Policy</b>	<b>“Do Nothing” Alternative - Assumes proposals would still come forward</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality				
ET3. To reduce waste	0/+ Encourages recycling and composting through provision for storage			
ET4. To reduce the effects of traffic upon the environment	+ Encourages safe access to infill development	- No cycle storage could deter cycling		
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	- Gardens could be developed	- Gardens could be developed		
ET9. To conserve and where appropriate enhance areas and sites of historical importance	-No consideration of impacts	-No consideration of impacts		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	- No consideration of possible impact on townscape	- No consideration of possible impact on townscape		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	+ Encourages cycling through provision of bicycle storage	- No cycle storage could deter cycling		
HW2. To improve the quality of life where people live and encourage community participation	++ Aims not to allow if would be disturbed by other land users	0/- Loss of community possible		
ER1. To reduce poverty and social exclusion	0/+ Seeks to establish a safe and secure environment	0/- Safety and security may not be considered		
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	+ Provides additional housing	+ Provides additional housing		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC14: Subdivision of family dwellings</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – Reduce control over conversions</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	0/+ Cycle storage provided, which might help discourage car use			
ET2. To conserve soil resources and quality	+ More dwellings can be provided through subdivision of larger units	0/- More greenfield may be used to meet housing demand		
ET3. To reduce waste	+ Recycling provisions addressed, although more houses would mean more waste			
ET4. To reduce the effects of traffic upon the environment	++ Cycle storage provided, which might help discourage car use, congestion and traffic movement	- No cycle storage could reduce cycle use		
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	0/+ Cycle storage provided, which might help discourage car use			
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance	+ Addresses listed buildings in policy	- Local areas may be altered through development of new sites		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Highlights need to make sure changes to areas are not detrimental	- Local areas may be altered through development of new sites		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	+ Will help meet housing targets, protects family housing	- Possible loss of family housing	Fewer large properties may be available although this addressed in policy	
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				



<b>Core Strategy Policy DC15: Travel demand management</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	++ Seeks to reduce car travel and protect AQMAs	-- Emissions and car travel wouldn't be managed and could increase		
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	++ Seeks to reduce car travel	-- Emissions and car travel wouldn't be managed and could increase		
ET5. To improve access to key services for all sectors of the population	++ Access to varied transport should improve accessibility			
ET6. To reduce contributions to climate change	++ Seeks to reduce car travel	-- Emissions and car travel wouldn't be managed and could increase		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	0/+ Air and noise pollution addressed	- Noise pollution could affect species		
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	0/+ Air and noise pollution addressed	- Noise pollution could affect species		
HW1. To improve the health of those most in need	+ Making cycling easier should improve health	- Cycling and walking may be less viable.		
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth	++ Addressed in policy	-- Emissions and car travel wouldn't be managed and could increase		
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC16: Sustainable Modes</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	+ Public transport and cycle facilities should decrease car use	- Could result in more car use and emissions		
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	+ Public transport and cycle facilities should decrease car use	- Could result in more car use and emissions		
ET5. To improve access to key services for all sectors of the population	+ Proximity to public transport should increase accessibility			
ET6. To reduce contributions to climate change	+ Public transport and cycle facilities should decrease car use	- Could result in more car use and emissions		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	+ Cycling and walking can improve health			
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Public transport and cycle facilities should decrease car use	- Could result in more car use and emissions		
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC17: Transport and Access in New Developments</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	++ Considers impact of development on traffic and hence air quality	-- More traffic and emissions could result		
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	++ Considers impact of development on traffic, encourages cycling and walking / access to public transport	-- More traffic and emissions could result		
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	++ Considers impact of development on traffic and hence air quality	-- More traffic and emissions could result		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	+ Pedestrian and cycle access to developments links to healthy lifestyles	- Less cycling and walking is worse for health of population		
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC18: Car Parking</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	0/- Providing car parking space could encourage use of cars	0/+ Less car use could result		
ET2. To conserve soil resources and quality	0/- Parking facilities could use up land, but seeks to avoid inefficient usage of land			
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	0/- Providing car parking space could encourage use of cars	0/+ Less car use could result		
ET5. To improve access to key services for all sectors of the population	0/+ Parking should improve access to facilities			
ET6. To reduce contributions to climate change	0/- Providing car parking space could encourage use of cars	0/+ Less car use could result		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance	+ Parking will not be allowed to dominate street scene			
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Parking will not be allowed to dominate street scene			
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	+ Seeks to integrate parking appropriately, minimum standard set for residential	- Parking issues can cause community tensions		
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	0/+ Easier parking can lead to more visits to retail centres	0/- Retail and economic centres could be harder to access		
ER5. To revitalise town centres	0/+ Easier parking can lead to more visits to retail centres	0/- Retail and economic centres could be harder to access		
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	+ Good parking near new development can increase usage	0/- Retail and economic centres could be harder to access		
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC19: Cycle Parking</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	+ Easier cycling should reduce car use and emissions	- More car use could result		
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	+ Provision of cycle parking could encourage use and reduce car trips / emissions	- More car use could result		Provision of cycle parking could encourage modal shift
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	+ Provision of cycle parking could encourage use and reduce car trips / emissions	- More car use could result		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	+ Cycling can improve health			
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth	+ Easier cycling should reduce car use and emissions	- More car use could result		
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

Core Strategy Policy DC20: The Central Shopping Area	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	+ Seeks to minimise impact of fumes and smell			
ET2. To conserve soil resources and quality	0/- Development could use up PDL			
ET3. To reduce waste	- More retail development could increase waste			
ET4. To reduce the effects of traffic upon the environment	+/- More traffic could travel to town centre, but other policies promote sustainable transport			
ET5. To improve access to key services for all sectors of the population	0/+ Access to shopping facilities should improve		Retail development could encourage service development nearby	
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0/- Retail development could change townscapes			
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+ Development could create jobs			
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	0/+ Could help grow economy			
ER5. To revitalise town centres	+ Should help revitalise town centre			
ER6. To encourage efficient patterns of movement in support of economic growth	+ Should help grow economy			
ER7. To encourage and accommodate both indigenous and inward investment	+ Should help attract investment			
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC21: District and Local Shopping Centres</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – No control of developments in district centres</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality		- Could mean people have to travel further to access services		
ET2. To conserve soil resources and quality	0/- Greenfield land could be used for development			
ET3. To reduce waste	0/- Development will increase waste			
ET4. To reduce the effects of traffic upon the environment	- Seeks to provide car parking, but no mention of public transport, or cycle access	- Could mean people have to travel further to access services		
ET5. To improve access to key services for all sectors of the population	+ Will improve access to services	- Access to services may not be as widespread		
ET6. To reduce contributions to climate change	0/+ More people likely to drive and park at centres, but journey times could be less than alternative	- Could mean people have to travel further to access services		
ET7. To reduce vulnerability to climatic events and increasing sea levels	? Areas of Duke Street are in the flood zone			
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0/- Development of local centres could change character			
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	+ Access to local services improves quality of life, allows community use	- Could mean people have to travel further to access services		
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+ Should create jobs			
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	0/+ More retail and employment land could grow economy			
ER5. To revitalise town centres	0/+ Only modest scale development will be placed in local centres so as not to threaten the vitality of town	-- Larger scale development could impact town centre vitality.		
ER6. To encourage efficient patterns of movement in support of economic growth	0/- Policy not strong enough on cycle and public transport provision.			
ER7. To encourage and accommodate both indigenous and inward investment	+ Should encourage investment			
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC22: Town Centre Uses outside the Central Shopping Area</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – Development could go anywhere</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality	0/- Development could be on PDL			
ET3. To reduce waste	0/- More development will mean more waste, recycling not mentioned in policy	+ Less waste produced		
ET4. To reduce the effects of traffic upon the environment	+ Sustainable transport modes advocated in policy	- Could add to congestion depending on location		
ET5. To improve access to key services for all sectors of the population	+ Access to service should improve	- Lesser level of access to services		
ET6. To reduce contributions to climate change	+ Sustainable transport modes advocated in policy			
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	- No consideration of townscape impact			
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	+ Sport and recreation services should improve health			
HW2. To improve the quality of life where people live and encourage community participation	++ Leisure and arts etc should improve cohesiveness			
ER1. To reduce poverty and social exclusion	+ Leisure development can improve inclusion			
ER2. To offer everybody the opportunity for rewarding and satisfying employment	++ Should create jobs			
ER3. To help meet the housing requirements for the whole community	0/- May take land that could be used for housing			
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Tourism facilities etc should grow economy			
ER5. To revitalise town centres	0/+ Aims not to threaten town centre	- Development could threaten vitality		
ER6. To encourage efficient patterns of movement in support of economic growth	+ Sustainable transport modes advocated in policy			
ER7. To encourage and accommodate both indigenous and inward investment	+ Arts and tourism facilities etc should grow economy	- Key sectors may not grow as effectively		
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity	+ More leisure facilities may reduce crime rate			



<b>Core Strategy Policy DC23: Major Retail Proposals outside of defined centres</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality	+/- Retail development outside defined centres may be on greenfield land	0/- Development outside of centres could be on greenfield land		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	+ Encouraging retail development in the town centre should maximise the percentage of the population who can reach service via sustainable modes	0/- Traffic may be increased in out of town centres		
ET5. To improve access to key services for all sectors of the population	+ Encouraging retail development in the town centre should maximise the percentage of the population who can reach service easily	0/- A bias for development in one side of the town may occur		
ET6. To reduce contributions to climate change	+ Encouraging retail development in the town centre should maximise the percentage of the population who can reach service via sustainable modes	0/- Traffic may be increased in out of town centres		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion	+ Major retail developments could create jobs			
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Major retail developments could create jobs			
ER5. To revitalise town centres	++ Concentrates development in town centres			
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

Core Strategy Policy DC24: Loss of residential accommodation	Policy	“Do Nothing” Alternative – Would allow residential development to go to employment uses	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	- Does not promote employment links to residential, will increase trip lengths.	++ Could allow employment to move closer to housing		
ET5. To improve access to key services for all sectors of the population	+ Allows change to community uses			
ET6. To reduce contributions to climate change			+ Change could lead to replace of inefficient units with more efficient energy use	
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity		- Possible loss of biodiversity if gardens are lost to employment development		
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Mainly retains existing housing and any proposed use must be compatible with surroundings			
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	++ May increase number of community facilities			
ER1. To reduce poverty and social exclusion	+ May increase number of community facilities			
ER2. To offer everybody the opportunity for rewarding and satisfying employment	- Inflexible to new employment uses	+ Provides sites for employment		
ER3. To help meet the housing requirements for the whole community	+ Seeks to retain housing	- Housing stock reduction		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	- Discourages employment link to residential	+ Provides sites for employment		
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth	- Discourages new employment uses (eg personal services, corner shop)			
ER7. To encourage and accommodate both indigenous and inward investment		+ Provides sites for employment		Long term discourages employment activities integrated into residential.
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity	+ May increase number of community facilities			

<b>Core Strategy Policy DC25: Affordable Housing</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – Lower Level of affordable provided</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	+/- Impact will not change according to nature of housing developed			
ET2. To conserve soil resources and quality	+/- Impact will not change according to nature of housing developed			
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	- Encourages car use by providing car parking			
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion	+ Affordable housing should be indistinguishable from market development	- Could increase social exclusion if affordable homes appear different		
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	++ Ensures mix of types of affordable housing for different family sizes	0 Does not address issue		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

Core Strategy Policy DC26: Protection of employment land	Policy	“Do Nothing” Alternative – No Policy	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	+ Could improve air quality if high transport demanding business are relocated			
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	+ Could improve air quality if high transport demanding business are relocated			
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	++ Could improve area	+ Could improve area by allowing employment use to go to residential		
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment		+ Could result in loss of jobs for the area		
ER3. To help meet the housing requirements for the whole community		+ Employment land could go to residential		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Seeks to retain employment land in sustainable locations			
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth	+ Seeks to retain employment land in sustainable locations			
ER7. To encourage and accommodate both indigenous and inward investment			(P) Higher design standards may make Ipswich more attractive to investors	
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC27: Protection of Amenity</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – No Policy</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	++ Will not allow polluting development in close proximity to areas which may suffer	- Air pollution potential higher		
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	0/+ Could help reduce emissions	- Air pollution potential higher		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance	+ Development that will disturb or affect historic sites negatively won't be allowed	- Damage to amenities higher		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	+ Development that negatively effects nearby environments wont be allowed	- Damage to amenities higher		
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	++ Quality of life improved through less noise and air pollution	- Lower quality of life due to location		
ER1. To reduce poverty and social exclusion		- Could increase exclusion		
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity	+ Less chance of anti social noise and air pollution			

<b>Core Strategy Policy DC28: Non residential uses in residential areas</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – Allow non residential</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	0/+ States effects on traffic must be minimal	- Traffic generation from employment use could impact upon quality of residential area		
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	0/+ States effects on traffic must be minimal	- Traffic generation could increase		
ET5. To improve access to key services for all sectors of the population	+ Could locate services close to housing	+ Could locate services close to housing		
ET6. To reduce contributions to climate change	0/+ States effects on traffic must be minimal	- Increased traffic generation		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	+ Placing community facilities could act as a catalyst for econ dev	- Too much employment in residential areas could reduce quality of life		
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment	+ Could place employment near housing	+ Could place employment near housing		
ER3. To help meet the housing requirements for the whole community	+ Safeguards housing stock	- Housing may be moved to employment use		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Facilitates economic growth			
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth	+ States effects on traffic must be minimal			
ER7. To encourage and accommodate both indigenous and inward investment	+ Facilities investment			
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC29: Protection of open spaces, sport and recreation facilities</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality	+ Open space less likely to be developed	- Open space more likely to be developed		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population	+ Access to open and play space should be maintained or improved	- Access to open and play space could decrease		
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Open space shouldn't be developed	- Open space more likely to be developed		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	++ Access to sport facilities should increase health	-- Loss of sport and recreation space decreases opportunities for active leisure		
HW2. To improve the quality of life where people live and encourage community participation	++ Maintained open space should improve quality of life	- Less open space and recreation space		
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	0/- Less scope for meeting housing needs	0/+ Housing land more readily available.		
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults	+ Children's recreation and play space should be retained	- Less recreation space for children could hinder development		
CD1. To minimise potential opportunities for crime and anti-social activity	0/+ More recreation spaces could lead to less crime	0/- Less recreation and sport space could lead to more crime		

<b>Core Strategy Policy DC30: Provision of new open spaces and sport / recreation facilities</b>	<b>Policy</b>	<b>“Do Nothing” Alternative - No standard for provision</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality	+ Open space less likely to be developed	- Open space more likely to be developed		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population	+ Access to open and play space should be maintained or improved	- Access to open and play space could decrease		
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels	+ More green space will provide soakaway for runoff	- increased runoff from greater impermeable area		
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Provision of open space could enhance distinctiveness	- Open space more likely to be developed		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	++ Access to sport facilities should increase health	-- Less sport and recreation space available		
HW2. To improve the quality of life where people live and encourage community participation	++ More open space should improve quality of life	- Less open space and recreation space		
ER1. To reduce poverty and social exclusion	-- Lower standards might be excepted for affordable housing, thereby emphasising difference			
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	0/- Less scope for meeting housing needs	0/+ Housing land more readily available.	Requirement for open space could lead to higher density housing	
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults	++ Children's recreation and play space addressed	- Less recreation space for children could hinder development		
CD1. To minimise potential opportunities for crime and anti-social activity	0/+ More recreation spaces could lead to less crime	0/- Less recreation and sport space could lead to more crime		



<b>Core Strategy Policy DC31: Housing density</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – Allows more flexibility as not set out in PPS3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ High densities around service centres may reduce trip generation	- Allows more flexibility as PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities		
<b>ET2. To conserve soil resources and quality</b>	+ Would ensure less greenfield land is required for development	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities		
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ High densities around service centres may reduce trip generation			
<b>ET5. To improve access to key services for all sectors of the population</b>	? No consideration of impact of high densities on service needs			
<b>ET6. To reduce contributions to climate change</b>	+ High density of housing may reduce CO <sub>2</sub> emissions, especially if CHP schemes are used	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>	+Suggestion of exceptions to density requirements where required.	- Biodiversity could suffer		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>				
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Densities may be varied according to character of site			
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+ High densities around service centres may encourage walking/cycling			
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	- Focus is on achieving densities not creating communities			
<b>ER1. To reduce poverty and social exclusion</b>				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>				
<b>ER3. To help meet the housing requirements for the whole community</b>	+ High density of housing means more can be built	-- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	- Focuses on housing and not likely to provide of range of employment			
<b>ER5. To revitalise town centres</b>	+ High densities in town centre may improves its vitality	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ High densities around service centres may reduce trip generation	- As PPS 3 does not set out density standards (apart from a minimum of 30/ha) may result in lower densities		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ May mean more land is available for employment use			
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	- No consideration of impact on school provision of high density			
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	- No consideration of crime and anti social issues in high density areas			

<b>Core Strategy Policy DC32: Natural and Geological Interest</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – No Policy</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	+ Water conservation likely to be interlinked			
ET2. To conserve soil resources and quality	++ Soil resources will be protected	-- May otherwise suffer		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	++ Addressed in policy	-- May otherwise suffer		
ET9. To conserve and where appropriate enhance areas and sites of historical importance	++ Addressed in policy	-- May otherwise suffer		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	++ Should help protect designated areas			
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	0/- Could limit housing growth			
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	0/- Could limit economic growth			
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment	0/- Could discourage investment			
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

Core Strategy Policy DC33: Protection and Provision of community facilities	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population	++ Community service levels should be maintained and enhanced	-- May otherwise suffer		
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	+ Access to facilities could include leisure and health facilities	-- May otherwise suffer		
HW2. To improve the quality of life where people live and encourage community participation	++ More community facilities should lead to more participation	-- May otherwise suffer		
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment	0/+ Community facilities could employ people	-- May otherwise suffer		
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults	++ Education facilities are addressed in policy	-- May otherwise suffer		
CD1. To minimise potential opportunities for crime and anti-social activity	++ More community facilities could detract from crime			





**Suffolk County Council**



## **Addendum to**

**Sustainability Appraisal (incorporating Strategic Environmental  
Assessment)  
Of Draft Submission Core Strategy and Policies (September 2009)**

**SA Update: The Core Strategy and Policies (Council  
Version, September 2009)**

**For Ipswich Borough Council**

**September 2009**

**Prepared by the Research & Intelligence Team, Planning and Performance Improvement,  
Suffolk County Council, in association with Ipswich Borough Council**





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## **1. NON-TECHNICAL SUMMARY**

### **1.1. Non-technical summary**

**1.1.1** This document updates the sustainability appraisal undertaken for the Ipswich Borough Council Draft Submission Core Strategies and policies (as at July 2009). As a result of that July sustainability appraisal and other internal, stakeholder and elected member discussions, a number of revisions to policies were made, ready for approval by the Borough Council on 9<sup>th</sup> September 2009. Hence this sustainability appraisal addendum reassesses the sustainability of policies that changed in wording and reconsiders the overall sustainability of the plan.

**1.1.2** The revised significant effects of the 53 policies are summarised in Table 8.1 overleaf. The final column shows the combined impact on the 22 sustainability indicators of the policies. For the large majority of indicators, the overall effect is positive. The effects are much stronger across the range of indicators than at the Preferred Options stage and slightly stronger than those proposed in the Draft Submission document, which was assessed in the SA report to which this document is an addendum.

**1.1.3** Compared with the proposed submission document, the council version has recorded no new negative impacts, has alleviated some negative impacts and scored some new positive impacts.

**1.1.4** The SA assessing the draft submission version of the Core Strategy and Policies identified that there were weaknesses in the plan referring to waste, biodiversity, flooding and crime. Three out of these four issues have seen improvements in the September 2009 council version of the document.

**1.1.5** Waste has improved from scoring 2 to 4, hence doubling its strength in the plan. This should also be considered alongside the wording of policy CS4 which states that all new developments must minimise waste generation throughout their construction period and lifetime.

**1.1.6** Biodiversity protection has seen an SA score increase from 7.5 to 8.5. As with waste minimisation and recycling, policy CS4 Protecting our assets has the potential to provide mitigation due to the wording regarding protection and enhancement to the biodiversity asset.

**1.1.7** Flood risk scores 7 against the SA framework; the same score recorded in the original SA. As stated in section 10.1.3 of the original SA, flood risk is mitigated through policies CS18 and DC4.

**1.1.8** Finally, improvements were made in terms of scores for crime related indicators, where safe and convenient access to public transport bolstered policy DC15, to raise the SA score from 7 at proposed submission stage, to 8 in this assessment of the council version of the LDD.

**1.1.9** In summary the plan is strongest in its consideration of quality of life and reducing the impact of traffic on air quality. The areas which remain of most concern are reducing waste, and reducing vulnerability to climatic events and rising sea levels.

**1.1.10** Recognition of the existence of an area with AONB designation is now acknowledged in the supporting text of policy CS4 and local protection of the landscape character is reflected in the policy wording of CS16. Paragraph 8.42 should refer to the Countryside and Rights of Way Act 2000 that empowers local authorities to “take all such action that appears to the expedient for the accomplishment of the purpose of conserving and enhancing the natural beauty of the AONB” (as quoted from the Suffolk Coasts and Heaths Management Plan 2008-2013, published 2008).



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

This SA addendum updated report has reported on changes made to the Council version of the Ipswich Borough Council Core Strategy and Policies, as opposed to the previously assessed draft. Implications on sustainability are assessed and reported on, including changes made to the council version document as a result of the SA process.

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

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

Economic Development and Planning Policy  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

Tel: 01473 432019 Web: [www.ipswich.gov.uk](http://www.ipswich.gov.uk) Email:  
[planningandregeneration@ipswich.gov.uk](mailto:planningandregeneration@ipswich.gov.uk)

## **2. INTRODUCTION**

### **2.1. Purpose of the report**

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

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

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

**2.2.4** This SA assesses the implications of changes between the previously assessed draft submission Core Strategy and Policies document published in July 2009, compared to the final council document as produced by Ipswich Borough Council in September 2009. It reassesses the sustainability of individual policies that changed in some cases in response to the first sustainability appraisal and then slots these results into the overall assessment. A reassessment of the overall sustainability of the plan has then been made.

### **2.2. Compliance with SEA directive and regulations**

**2.2.1** This SA is intended to fully comply with the requirements of the SEA Directive, as set out in "A Practical Guide to the Strategic Environmental Assessment Directive" September 2005. Chapter 12 sets out a quality assurance checklist designed to illustrate how the technical and procedural elements of the SEA process have been handled in this appraisal.

### **3. METHOD OF ASSESSMENT**

#### **3.1. Approach adopted to Sustainability Appraisal**

**3.1.1** The approach adopted to the linked sustainability appraisal is outlined in the SA report reporting on the Draft Submission Core Strategy and Policies document.

**3.1.2** This addendum report lists all changes made in the final council document compared to the original document, and reassesses their impact against the sustainability framework.

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

This SA addendum report was carried out in September 2009.

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

The addendum sustainability appraisal was carried out by the Research and Intelligence team within the Planning and Performance Specialist Support Function at Suffolk County Council.

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

The SA Scoping Report went to consultation in March 2006, and was sent to the statutory bodies, i.e. the Environment Agency, English Heritage, the Countryside Agency and English Nature (before their merger), key stakeholders as well as Suffolk County Council. The SA on the preferred options was subject to consultation from January to March 2008.

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

Baseline data listed in the original SA Report has been updated where possible, but constraints on availability of information sometimes mean that data is some years out of date.

#### **3.6. Technical deficiencies**

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

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

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

#### **3.8. Appropriate Assessment**

**3.8.1** According to the terms of the Habitats Directive (Article 6(3)), any plan that has a significant effect upon a site protected by the directive (Special Areas of Conservation, Special Protection Areas and Offshore Marine Sites) is subject to an appropriate assessment.

**3.8.2** An Appropriate Assessment of the core strategy and policies has been undertaken by the Landscape Partnership.

#### **4. STATE OF THE ENVIRONMENT IN IPSWICH AND SUFFOLK**

##### **4.1. Baseline Information**

For detailed baseline information and issues, please refer to section 4 of the original SA report.

#### **5. SUSTAINABILITY OBJECTIVES AND CRITERIA**

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

**5.1.1** For links to other policies, plans and programmes please refer to section 5.1 of the original SA report.

**5.1.2** This document is an addendum SA report, assessing changes made to the final council document, in comparison to the previously assessed Draft Submission Core Strategy and Policies document.

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

Please refer to section 5.2 of the original SA report for information relating to SA objective development.

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

For information relating to the SA framework, objectives, targets and indicators, please refer to the original SA report.

##### **5.4 Compatibility of SA Framework**

For a compatibility matrix please refer to section 5.4 of the original SA report.

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

### **6.1. Statutory purpose**

In formal terms this Core Strategy and Policies Development Plan Document is intended to fulfil the requirements of the third stage of the five stage Local Development Framework production process (i.e. the Regulation 27 stage under the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

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

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

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

The links to the regional spatial strategy and the Ipswich Community Strategy are described in the LDD.

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

For a summary of content please refer to section 6.4 of the original SA report.

### **6.5. Consultations carried out**

Consultation on the Issues and Options for the proposed DPD was undertaken in January and February 2005, June and July 2006 and March 2007. The Preferred Options document was then consulted on between January and February 2008, along with the Ip-One Area Action Plan, Site Specific Allocations and accompanying sustainability appraisal. The results of this consultation have been taken into account in this appraisal.

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

For compatibility of the plan objectives with the SA objectives please refer to section 6.6 of the original SA document. It should be noted that the overall plan objectives in the council version of the LDD have not changed; hence the original assessment in the SA report still stands.

## 7. POLICIES AND ALTERNATIVES

### 7.1. Policies and options considered

The table below details changes made to the September 2009 Core Strategy and Policies development plan document, compared with the previously assessed Draft version of the document from July 2009. Changes in **bold** type relate to comments made in the first sustainability appraisal.

*Table 7.1 Changes to the LDD and SA outcomes.*

Policy or Section	Detail of Change	Justification	SA Implications	Original SA Score for Policy	New SA Score for Policy
CS2	Added <i>very</i> high quality architecture	To reflect Council's aspiration for excellent design, and ensure policy corresponds with Policy DC5.	No impact on SA scoring.	<b>19</b>	<b>20</b>
	New paragraph added about urban characterisation.	To flag up urban characterisation exercise as a means to ensure that local character is enhanced through new development.	Now scores positively for ET10		
CS4	<b>Reference added in supporting text to the AONB, a small part of which is in Ipswich Borough.</b>	For completeness.	No impact on SA scoring due to no specific local protection of management of AONB reflected in policy wording.	<b>17</b>	<b>18</b>
	Text added referring to the preparation of an SPD if one is needed.	To address current uncertainty around revisions to PPG15 and PPG16 about the historic environment.	Does not improve scoring which is already positive.		
	Reference added to adopting the revised local list as SPD.	To assist the retention of such buildings.	Now scores positively for ET10		
CS5	<b>Reference added to prioritising introduction of a cycle network.</b>	To make explicit reference to the Council's commitment to cycling.	Policy already scores positively for relevant indicators.	<b>15</b>	<b>15</b>
CS8	Reference added to the Housing Needs Study and Strategic Housing Market Assessment	To provide the context for considering the appropriate housing mix in schemes.	No impact upon SA scoring	<b>11.5</b>	<b>11.5</b>
CS10	Third paragraph of policy changed so that preparation of the SPD would begin when the Core Strategy is adopted.	To ensure that a coherent, detailed plan for the development of the area is put in place ahead of any potential development.	No impact upon SA scoring	<b>1</b>	<b>1</b>
	New paragraph 8.107 added.	To clarify the Council's approach to RSS review			
	Paragraph 8.108 amended (was previously para 8.107).	To explain why the SPD work needs to start sooner.			
	Paragraph 8.114 (new numbering – was previously 8.113) amended  Previous paragraph 8.114 deleted.	Superseded by replacement text.			
CS12	Addition of reference to floorspace in the policy.	To clarify how the policy will be applied.	No impact upon SA scoring	<b>6</b>	<b>6</b>
	Target for larger developments increased to 40%.	To meet need in Ipswich and ensure the overall regional figure of 35% is achieved.			

Policy or Section	Detail of Change	Justification	SA Implications	Original SA Score for Policy	New SA Score for Policy
	Requirement for rented tenure increased to 80%	taking account of smaller developments also.  To reflect the level of need identified in the Housing Needs Study.			
	Corresponding changes to the explanatory text in paragraphs 8.126, 8.129, and 8.131.	For clarity regarding changes to the policy.			
CS13	Reference included to the Ipswich Policy Area.  Clause f. revised to include reference to a delivery plan.	To reflect the recommendation of the Employment Land Review for a joint approach at the Ipswich fringe – already referred to in paragraph 8.141.  To ensure implementation of sustainable economic growth measures.	No impact upon SA scoring	6	6
CS14	More information provided about extension to Central Shopping Area.	For clarity.	No impact upon SA scoring	12	12
	New paragraph added.	To address problem of vacant units.	No impact upon SA scoring		
CS16	<b>Amendments to clauses b, d and g and correspondingly to paragraph 8.185.</b>	To reflect the findings of the Appropriate Assessment and clarify the Council's commitment to working with others to mitigate potential impacts arising from growth.	Now scores positively for ET5 (may be more access to leisure facilities such as country park)  Mention of AONB now added to improve score of ET10.  Now scores positively rather than negatively on ET11 as protected areas are focused upon.	3	7
CS18	Reference added to residual risks.	To better reflect PPS25, as requested by the Environment Agency.	No change to existing SA scoring.	5	5
	Sentence added about the Level 2 SFRA.	To clarify the situation if the tidal barrier did not get built, as requested by the Environment Agency.	No change to existing SA scoring.		
	Reference added to plan objectives.	For consistency.	No change to existing SA scoring.		
CS19	Reference added to Strategic Housing Land Availability Assessment findings.	To make the link to the evidence base document about the site's suitability, availability and deliverability.	No change to existing SA scoring, but adds supporting evidence.	2	2
CS20	<b>Amended to refer to planned crossings on the Star Lane gyratory.</b>	To explain measures already in the pipeline to improve physical integration.	Bolsters policy in terms of ensuring that there is a net decrease in traffic, however this was considered as a key	3	5
	Last sentence of previous paragraph deleted.	Pre-empts/repeats the policy.			



Policy or Section	Detail of Change	Justification	SA Implications	Original SA Score for Policy	New SA Score for Policy
	<p><b>Substantial amendments throughout:</b></p> <p><b>Reference to reducing car dependency included in first paragraph;</b></p> <p>Reference to Wet Dock Crossing as one of a package of measures included in second paragraph;</p> <p><b>Reference to traffic management added to clause d.</b></p> <p>Reference to local movement in north Ipswich added to seventh paragraph; and</p> <p><b>New additional eighth paragraph added about rail freight.</b></p> <p>Also corresponding changes to the explanation paragraphs following the policy.</p> <p>Reference added to route not passing between Ipswich and Westerfield.</p>	<p>To tie in with the Ipswich Major Scheme.</p> <p>To provide wider context for possible Wet Dock Crossing.</p> <p>To provide wider context for any schemes to increase road capacity.</p> <p>To recognise all the functions a northern bypass could perform.</p> <p>To protect the line of the 'Bacon Chord' rail link.</p> <p>To reflect the changes made to the policy.</p>	<p>outcome of the original policy.</p> <p>Concerns still exist over potential negative impacts from a wet dock crossing and no substantial focus on impact management within the policy.</p> <p>Improved scoring for ER6 due to support for rail freight</p>		
DC2	Policy amended to explain the approach if 15% is not viable or feasible.	To clarify that some measures will still be expected even if 15% renewables or low carbon cannot be achieved.	Strengthens policy, but does not increase scoring which was already positive.	4	4
	Text added to explain that efficiency measures may also be acceptable if 15% renewables or low carbon cannot be achieved.	To explain policy and ensure flexibility of approach	No impact upon SA scoring.		
DC3	'Existing' added to policy title.	To clarify that the requirements would also apply to existing gardens where subdivided. Requested by Planning & Development Committee.	No impact upon SA scoring.	1	1
	Sentence added about soakaways.	For clarity as soakaways may need larger garden spaces than the minimum.	No impact upon SA scoring.		
	<p>Added 'will normally be required' in first sentence.</p> <p>Added reference to the Development Control Policies and Guidelines and to existing gardens affected by severance.</p>	<p>For clarity.</p> <p>To explain that the standards apply equally to gardens where subdivided and clarify that normal space standards apply.</p> <p>Changes requested by Planning &amp; Development Committee.</p>	No impact upon SA scoring, positive outcome already identified.		
DC4	'... all forms of...' added to clause a.	For clarity	No impact upon existing scoring for flood related content, positive impact already anticipated.	4	4
	Sentence added about flood zone 3b.	For clarity and as requested by the Environment Agency.			

Policy or Section	Detail of Change	Justification	SA Implications	Original SA Score for Policy	New SA Score for Policy
	Sentence added about site specific FRAs.	For clarity and as requested by the Environment Agency.			
	Reference added to surface water.	For clarity.			
	Sentence added about the source of various standards.	For clarity and as requested by the Environment Agency.			
	Sentence added about site specific FRAs.	For clarity and as requested by the Environment Agency.			
	Reference added to Level 2 SFRA.	For clarity.			
DC5	Added '... for all users ...' to clause a.	For clarity	Related positive scores already identified through existing content, no change to existing SA scores.  Now scores strong positive for ET1 – air quality.	7	10.5
	Clause f. 'very' added.	To reflect requirement for very good architecture. Changes requested by Planning & Development Committee			
	New clause h. added about Air Quality Management Areas.	To ensure design and layout takes account of air quality.	No impact upon SA scoring.		
	Added reference to public realm being friendly to all users.	To support change to policy and for clarity. Requested by Planning & Development Committee			
	Sentence added about street clutter.	To ensure this is considered in design and layout. Requested by Planning & Development Committee	No impact upon SA scoring.		
	Sentence added about the Council's Development Control Policies and Guidelines.	For clarity that these standards will also apply. Requested by Planning & Development Committee	No impact upon SA scoring.		
	Sentences added about maximising greening and incorporating biodiversity measures.	To clarify the Council's expectation of greener developments, and as requested by Planning & Development Committee	Now scores positively instead of weak positive for ET2.  Now scores strongly positively for biodiversity ET8 as opposed to a single positive.		
	New paragraph added explaining the air quality addition to the policy.	For clarity.	Duplication. No change.		
DC6	<b>New clause k. added about the setting of listed buildings.</b>	For completeness and to address the relationship between the historic core of Ipswich and taller buildings at its fringes.	Slight negatives removed for ET9 and ET10.	5.5	6.5
	Sentence added to explain change to policy.	For clarity.	No impact upon SA scoring.		
	Requirement added to have regard to CABE guidance.	For completeness.	No impact upon SA scoring.		
DC7	Rewording of start of policy and explanation.	To add some flexibility around the application of the policy. Requested by Planning & Development Committee	No impact upon SA scoring.	2.5	2.5

Policy or Section	Detail of Change	Justification	SA Implications	Original SA Score for Policy	New SA Score for Policy
	Sentence added about contributions.	For clarity about operation of the policy.	No impact upon SA scoring.		
DC10	Hedgerows added to title.  Hedgerows also added to third paragraph.  Clause e. changed to two for one replacement planting.	For completeness.  To ensure hedgerows on development sites enjoy protection also.  To compensate for loss of mature trees and time taken for new trees to grow.  Requested by Planning & Development Committee	Now scores positively for biodiversity.	2.5	3
	New paragraph added about off site planting and management plans.	To explain the changes to the policy and its implementation. Requested by Planning & Development Committee	No impact upon SA scoring.		
DC12	First line amended to refer to extensions.  Clause d also amended to refer to extensions.	For clarity.	No impact upon SA scoring.	6	6
DC13	Policy re-cast to emphasise that development will only be permitted if all the criteria are satisfied.	To ensure that the quality of such developments can be controlled. Requested by Planning & Development Committee	No impact upon SA scoring.	3	3
	New paragraph added about remnant garden remaining after severance and the Council's space standards.	See DC 13 above.	No impact upon SA scoring.		
DC14	Policy amended to say ... will be permitted provided that ... and corresponding changes to wording of clauses.  Clause a amended to cross refer to the parking standards.	For consistency with other development control policies, and clarity.	No impact upon SA scoring.	8	8
	Reference added to protecting amenity through the layout.	To explain how the policy will be implemented. Requested by Planning & Development Committee	No impact upon SA scoring.		
	New paragraph added about the broad proportion of HMOs in an area.	To explain how the policy will be implemented.	No impact upon SA scoring.		
DC15	Reference added to 'dedicated' cycle routes, and 'safe and convenient' access to public transport.	For clarity. Requested by Planning & Development Committee	Now scores positively for CD1 as safe and convenient access to public transport is addressed and should decrease crime and anti social behaviour.	12	13
DC16	In clause a, 'good' changed to 'safe and convenient'.	For clarity. Requested by Planning & Development Committee	No impact upon SA scoring.	6	6

Policy or Section	Detail of Change	Justification	SA Implications	Original SA Score for Policy	New SA Score for Policy
DC17	New clause added regarding bus priority measures and dedicated cycle routes.	For completeness and to ensure that developments support sustainable travel choices. Requested by Planning & Development Committee	Positive scores already achieved for related indicators	7	7
	Reference added to strategic measures for cycling.	For completeness.	No impact upon SA scoring.		
DC20	References to 'non-A1 retail' changed to 'A2-A5'.	For clarity.	No impact upon SA scoring.	4	4
	Three local centres deleted from the list: Clapgate Lane, Norfolk Road / Suffolk Road/Tuddenham Avenue and Grove Lane.	The centres no longer perform a local centre function (for example because they have lost their shops).	No impact upon SA scoring.		
	Paragraph simplified and amended.	For clarity and consistency with Policy CS12.	No impact upon SA scoring.		
	Explanation added about clusters of affordable homes.	For clarity and to support the implementation of the policy. Requested by Planning & Development Committee	No impact upon SA scoring.		
DC27	References to 'serious' amended to 'significant.'	To ensure that amenity is adequately protected and for consistency with explanation. Requested by Planning & Development Committee	No impact upon SA scoring.	7.5	7.5
DC30	'Public' added to policy title and throughout policy and explanation.	To clarify that open spaces and sport and recreation facilities are expected to be available for public use.	No impact upon SA scoring.	8	8
	15% added to second paragraph of policy.	Higher density developments need more on site green space provision. Requested by Planning & Development Committee.			
	Third paragraph of policy amended slightly – 'will be sought...'	For clarity. Requested by Planning & Development Committee			
	Additions made consequent to the changes to the policy.	For clarity.	No impact upon SA scoring.		
	Reference added to linking habitat to existing green networks.	To maximise benefits and link to Policy CS16.			
	Requirement added for management plans for planting proposals.	To ensure planting thrives. Requested by Planning & Development Committee			
	Reference added to private garden space.	For clarity.	No impact upon SA scoring.		
New paragraph added setting out minimum residential floorspaces that developers will be encouraged to achieve.	To ensure the high quality of new development in the town. Requested by Planning & Development Committee	No impact upon SA scoring.			
Sentence added about management plans for facilities.	For completeness. Requested by Planning & Development Committee	No impact upon SA scoring.			

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

### 7.2.1 Assessment methodology

Alterations to policies were considered against the SA framework, and any changes to scoring noted in table 7.2.

The assessment framework and methodology remains the same as that outlined in the original SA report (section 7.2.1)

### 7.2.2 Appraisal Results

The table below shows the changes made to the overall SA outcome for the plan as a result of changes made in the September 2009 Council version of the document. The full results for each altered policy can be found in appendix one of this document. Appendix one also records any secondary, short, medium or long term effects for each policy and options. Synergistic effects have been noted with the secondary effects. The overview and summary is based on the long term effects.

Table 7.2: Revised SA scores for the 53 policies

Policy	Draft Submission SA Score	Revised Score	Conclusion and Notes
CS1	10	10	
CS2	19	20	SA score increased
CS3	24	24	No change to SA score.
CS4	17	18	SA score increased
CS5	15	15	No change to SA score.
CS6	13	13	
CS7	-7	-7	
CS8	11.5	11.5	No change to SA score.
CS9	8	8	
CS10	1	1	No change to SA score.
CS11	23.5	23.5	
CS12	6	6	No change to SA score.
CS13	6	6	No change to SA score.
CS14	12	12	No change to SA score.
CS15	12	12	
CS16	3	7	SA score increased
CS17	25	25	
CS18	5	5	No change to SA score.
CS19	2	2	No change to SA score.
CS20	3	5	SA score increased.
DC1	7.5	7.5	
DC2	4	4	No change to SA score.
DC3	1	1	No change to SA score.
DC4	4	4	No change to SA score.
DC5	7	10.5	SA score increased
DC6	5.5	6.5	SA score increased
DC7	2.5	2.5	No change to SA score.
DC8	5	5	
DC9	4	4	
DC10	2.5	3	SA score increased
DC11	6	6	
DC12	6	6	No change to SA score.
DC13	3	3	No change to SA score.
DC14	8	8	No change to SA score.
DC15	12	13	SA score increased
DC16	6	6	No change to SA score.
DC17	7	7	No change to SA score.
DC18	3.5	3.5	
DC19	5	5	
DC20	4	4	No change to SA score.
DC21	2.5	2.5	
DC22	11	11	
DC23	7	7	
DC24	3	3	
DC25	2	2	
DC26	5	5	
DC27	7.5	7.5	No change to SA score.

DC28	8.8	8.5	
DC29	8	8	
DC30	8	8	
DC31	7	7	
DC32	7.5	7.5	
DC33	9.5	9.5	

**7.2.3** Of the fifty-three policies, twenty-eight policies had alterations which were considered sufficient to warrant re-assessment against the SA framework. In eight cases, the SA score increased, and in twenty-one cases there was no change to the assessment outcome for the policy.

**7.2.4** In cases where the SA scoring has not changed, it was often considered that the maximum score had been awarded to a policy, so despite a bolstering of policy wording around certain issues, the score remained the same.

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

The eight policies which were considered to have strengthened in the council version of the LDD are specified below:

#### *Policy CS2 – The Location and Nature of Development*

Inclusion of wording regarding landscape and townscape character meant that this policy scored positively for indicator ET10 (distinctiveness and townscape).

#### *Policy CS4 – Protecting our Assets*

Additional wording referring to heritage of towns and listed buildings resulted in the scoring for ET10 increasing.

#### *Policy CS16 – Green Infrastructure, Sport and Recreation*

Policy now mentions development of a Country Park, hence access to leisure and community facilities is considered to have improved, plus mention is made to implementing the Suffolk Coasts and Heaths Management Plan, hence a positive score is now awarded for ET5. (access to key services) and ET 11 (protect SSSIs, SPAs and SACs).

#### *Policy CS20- East West - Transport capacity*

Addition of sentence supporting upgrade of the Felixstowe – Nuneaton rail line and protection of the ‘Bacon Chord’ hence positive score for ER6 (efficient patterns of movement in support of economic growth)

#### *Policy DC5 – Urban Design Quality*

New biodiversity content in the policy means that it now scores positively for indicator ET2. (to conserve soil resources )

#### *Policy DC6 – Tall Buildings*

Enhanced wording relating to landscape and townscape character resulted in the removal of two “weak negative” scores for indicators ET9 and ET10.

#### *Policy DC10 – Protection of Trees and Hedgerows.*

This policy has been expanded to also include the protection of hedgerows. This has associated biodiversity benefits, and hence now scores positively for indicator ET2.

*Policy DC15 – Travel Demand Management*

Additional wording now included in the policy with reference to ensuring safety of access to public transport services. It was considered that this amendment warranted a positive score for crime related indicators (CD1).

**7.4. Why the policies were chosen**

The Core Strategy contains justifications for choosing each of the policies over the alternatives. Revisions to the policies were subsequently made in the light of further discussion with stakeholders and elected members as part of the plan preparation process and in the light of the first (July) sustainability appraisal.

**7.5. Any proposed mitigation measures**

No further concerns were raised as a result of the assessment based on the council version of the LDD.

Hence mitigation remains the same as outlined in section 7.5 of the original SA report. Where there are concerns about the impact of an individual policy, section 7.5 typically suggests that policy exists within the plan to mitigate that risks, where the basket of policies overall provide a well balance and sustainable plan.

## **8. LIKELY SIGNIFICANT EFFECTS OF THE PLAN**

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

**8.1.1** The revised significant effects of the 53 policies are summarised in Table 8.1 overleaf. The final column shows the combined impact on the 22 sustainability indicators of the policies. For the large majority of indicators, the overall effect is positive. The effects are much stronger across the range of indicators than at the Preferred Options stage and slightly stronger than those proposed in the Draft Submission document, which was assessed in the SA report to which this document is an addendum.

**8.1.2** Compared with the proposed submission document, the council version has recorded no new negative impacts, has alleviated some negative impacts and scored some new positive impacts.

**8.1.3** The SA assessing the draft submission version of the Core Strategy and Policies identified that there were weaknesses in the plan referring to waste, biodiversity, flooding and crime. Three out of these four issues have seen improvements in this version of the document.

**8.1.4** Waste has improved from scoring 2 to 4, hence doubling its strength in the plan. This should also be considered alongside the wording of policy CS4 which states that all new developments must minimise waste generation throughout their construction period and lifetime.

**8.1.5** Biodiversity protection has seen an SA score increase from 7.5 to 8.5. As with waste minimisation and recycling, policy CS4 Protecting our assets has the potential to provide mitigation due to the wording regarding protection and enhancement to the biodiversity asset.

**8.1.6** Flood risk scores 7 against the SA framework; the same score recorded in the original SA. As stated in section 10.1.3 of the original SA, flood risk is mitigated through policies CS18 and DC4.

**8.1.7** Finally, improvements were made in terms of scores for crime related indicators, where safe and convenient access to public transport bolstered policy DC15, to raise the SA score from 7 at proposed submission stage, to 9 in this assessment of the council version of the LDD.

**8.1.8** In summary, implementation of the preferred policies as a group of policies, have the potential to build and maintain sustainable communities in Ipswich in the long term. The plan should make a difference to the quality of life of where people live, improving access to services and water and air quality. The latter is a result of the policies that seek to conserve and reuse water and activities that should reduce the level of traffic and congestion, thereby improving air quality. Other strengths include preserving soil resources, achieved through the requirement to prioritise the use of previously developed land, as would be expected in an urban area.

**8.1.9** The plan will also encourage indigenous and inward investment through the quality of the environment it will create and this will help increase the number of jobs and level of prosperity. Social exclusion should be reduced by the implementation of policies to provide sustainable transport modes. However it is noted that one policy stands out as having a significantly negative impact on poverty and social inclusion relating to reduced levels of open space in affordable housing developments in certain circumstances.

**8.1.10** The plan is slightly less effective at reducing waste, but this is covered by over-arching policies that refer to waste minimisation and recycling.

**8.1.11** There were only four strongly negative impacts recorded overall. Strongly negative impacts were recorded against policies CS2 (the location and nature of development), CS10 (northern fringe), CS19 (provision of health services) and DC30 Provision of open space. The most important of these issues is the location of development on flood plains, which could result in significant flood risk until policy DC4 and CS18 (flooding and sustainable urban drainage) is implemented. However



the phasing of development set out in these policies should mean that there is little to be concerned about in terms of serious flood risk resulting from the plan.

**8.1.12** None of the proposed policies were considered to have a negative impact on improving the health of the population overall, and helping to meet the housing needs of the whole community.

**8.1.13** In summary the plan is strongest in its consideration of quality of life and reducing the impact of traffic on air quality. The areas which are of most concern are reducing waste, and reducing vulnerability to climatic events and rising sea levels.



Table 8.1: Sustainability appraisal of the core strategy policies

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	T		
ET1. To improve water and air quality	++	+	+	0	++	+	-	+	+	+/-	+	0	-	++	+	+	++	0	?	+/-	++	+	0	++	++	+	0	+	0	0/+	0/+	++	0	0/+	++	+	++	0/-	+	+	0	0	0	0	+/-	+0	++	0/+	0	0	+	+	0	37.5		
ET2. To conserve soil resources and quality	+/-	+	++	++	0	+	-	+	+	--	+	+	+	++	+/-	-	0	+	+	+	0	0	+/-	+/-	+	0/+	0	0	+	+	+	+	0	+	0	0	0	0/-	0	0/-	0/-	0/-	+/-	0	+/-	0	0	0	+	+	+	++	0	21.5		
ET3. To reduce waste	++	0	0	++	0	0	-	0	0	0/-	+	0	-	-	0	0	+	0	-	0	++	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0/-	0/-	0	0	0	+	0	0	0	0	0	0	0	4		
ET4. To reduce the effects of traffic upon the environment	+	+	++	++	++	+	-	+	+	+/-	0/+	0	-	++	+	0	++	0	+	-	0	0	0	0	0/+	0/+	0	0	0	0	0	0	0	+	++	++	+	++	0/-	+	+/-	-	+	+	-	-	0	0	0/+	0	0	+	0	0	24.5	
ET5. To improve access to key services for all sectors of the population	0	++	++	++	++	+	0	+/-	+	0	++	0	0	-	++	+	+	0	+	+	++	0	0	0	0	0/+	0	0	0	0	0	0	0	0	0	++	+	0	0/+	0	0/+	+	+	+	+	0	0	0	+	+	+	?	0	++	32.5	
ET6. To reduce contributions to climate change	++	0	+	+	++	0	-	+	0	0	0	0	-	-	+	0	++	0	+	+	0	++	0	0	0/+	+	0	0	0	0	0/+	0	0	0	0	0	++	+	++	0/-	+	0	0/+	+	+	0	0	0	0/+	0/+	0	0	+	0	0	23.5
ET7. To reduce vulnerability to climatic events and increasing sea levels	++	--	-	0	0	0	-	-	-	+	++	0	-	0	0	0	+	++	0	0	++	0	0	++	0	+	0	0	0	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0	0	0	+	0	0	0	0	7			
ET8. To conserve and enhance biodiversity	0	0	0	++	0	+	-	0	-	0/-	++	0	0	0	-	+	+	0	--	-	0	0	0/+	0	++	0	0	0	0	0	++	+	-/+	-	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	0	8.5		
ET9. To conserve and where appropriate enhance areas and sites of historical importance	0	+	+	++	0	0	-	+	+	0	++	0	+	0	-	0	+	0	0	-	0	0	0	0	+	0	0	++	+	0	0	0	0	-	+	0	0	0	+	0	0	0	0	0	0	0	0	0	+	0	0	0	++	0	15	
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0	+	+	+	0	0	-	+	+	0/-	++	0	0	-	-	++	+	0	0	-	0	0	0	0	+	0	+	++	++	0	++	0/+	-	+	0	0	0	+	0	0/-	0/-	-	0	+	0	0	0	0	0	+	+	+	0	0	17	
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	0	0	0	++	0	+	0	0	+	+	++	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	13.5				
HW1. To improve the health of those most in need	0	++	+	0	++	+	0	+	0	0	+	0	0	+	0	+	++	0	+/-	+	0	0	0/+	0	0	0	0	0	0	0	0	0/+	0	+	0	+	+	+	0	+	0	0	0	0	0	0	0	++	++	+	0	+	26			
HW2. To improve the quality of life where people live and encourage community participation	0	+	++	++	+	0	0	++	+	0/+	++	+	0	0	++	+	++	-	+/-	+	0	0	+	0	+	0	+	0	0	0	0	++	++	0	0	0	0	+	0	0	+	++	0	++	0	++	++	+	++	++	-	0	++	40.5		
ER1. To reduce poverty and social exclusion	0	+	+	0	+	+	0	+	+	0	+	++	++	+	+	0	+	-	0	0	0	0	0	0	+	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	0	0	0	0	--	0	0	0	17			
ER2. To offer everybody the opportunity for rewarding and satisfying employment	0	++	++	0	+	+	0	0/-	-	0	++	0	++	+	+	0	+	+	0	+	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	++	0	-	0	0	0	+	0	0	0	0/+	18			
ER3. To help meet the housing requirements for the whole community	0	+	+	0	0	+	++	+	0	++	++	++	-	0	0	0	0	+	+	0	0	0/-	-	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	0	0	+	0/-	0/-	+	0/-	0	18
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	0	+	+	0	0	+	0	0	0	0	0	0	++	+	+	0	+	+	0	+	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0/+	0	0/+	0/+	+	+	-	0	+	0	+	0	0	14.5	
ER5. To revitalise town centres	0	+	++	0	0	0	+	+	+	0	0	0	++	++	0	0	0	0	0	0	0	0	0	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	16.5		
ER6. To encourage efficient patterns of movement in support of economic growth	0	+	++	0	++	+	-	+	+	0	0	0	-	++	+	0	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0/-	+	0	-	0	+	0	+	0	0	+	0	0	17.5		
ER7. To encourage and accommodate both indigenous and inward investment	+	++	+	0	0	+	0	0	0	0	0	0	++	++	+	0	+	+	0	+	0/-	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18.5			
CL1. To maintain and improve access to education and skills for both young people and adults	0	++	++	0	0	0	0	0	0	0	0	0	+	0	++	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13			
CD1. To minimise potential opportunities for crime and anti-social activity	0	+	+/-	0	0	0	0	0	0	0	0	0	0	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	9			
Total	10	20	24	18	15	13	-	7	11.5	8	1	23.5	6	6	12	12	7	25	5	2	5	7.5	4	1	4	10.5	6.5	2.5	5	4	3	6	6	3	8	13	6	7	3.5	5	4	2.5	11	7	3	2	5	7.5	8.5	8	8	7	7.5	9.5	0	



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

No further impacts from the revised policies were forecast which could be considered as being specifically appropriate to the short, medium or long term.

## **8.3 Secondary**

Secondary impacts are identified in section 8.3 of the original SA report; any further secondary effects are identified within the assessment tables found appendix one of this document.

## **8.4 Cumulative**

Cumulative impacts are identified in section 8.3 of the original SA report; any further cumulative effects are identified within the assessment tables found appendix one of this document.

## **8.5 Synergistic**

Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects can occur as habitats, resources or human communities get close to capacity. Possible synergistic effects that could occur in this plan could stem from a density of housing being achieved that triggers the provision of new services (e.g. doctors surgery, bus service, recycling scheme or combined heat and power scheme). In a sense this is planned for and anticipated in policy CS17 that seeks to establish residential and non residential planning gain tariffs.

## **8.6 Permanent and temporary**

**8.6.1** There are two main temporary effects of the options. The first of these relates to construction; as a significant amount of development is planned, this will result in the need for more construction workers in the area. This may result in an influx of migrant workers, which may affect community relations. The workers will require housing, though only until the construction has ended. Throughout the lifespan of this plan, several large developments in Suffolk are possible, including a potential indoor leisure park, as well as a new nuclear power station. Impacts from the construction of these developments could also exacerbate temporary problems identified above.

**8.6.2** A specific temporary effect of Policy CS18 (strategic flood defence) is that until the tidal surge barrier is completed, flood risk will remain at its present level, or possibly worse due to the effects of climate change. In the long-term, risk should be significantly reduced by a barrier.

## **9. REPORTS ON POLICY COVERAGE**

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

All policies which appeared in the originally assessed Draft Submission Core Strategy and Policies document appear in the final adopted version of the LDD. For details of omitted or discarded policies, refer to section 9 of the original SA report.

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

It was noted that a reference to the Countryside and Rights of Way act should be added to paragraph 8.4.2 of Policy CS4.

No further changes to the mitigation measures identified in section 10 of the original SA report have been advocated.

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

This document tracks changes made to the plan as a result of the assessment undertaken of the previous version of the document (Proposed Submission Core Strategy and Policies July 2009). These results to some extent can be found documented in table 7.1 of this document. In terms of the main concerns raised in the first assessment:

Flood risk – Concerns about the need for design sensitive to flood risk is now recognised to some extent in paragraph 9.3.7 of the plan as reference is made to the need to take into account other standards, such as recommended floor levels, are set out by the Environment Agency, and in PPS25 and its companion guide.

Waste minimisation - no changes have been made

Sustainable transport – CS20 now reflects support for rail.

Changes to policy wording has been made in 2 out of 5 cases suggested. Changes have been made to CS17 so the infrastructure list includes waste facilities and CS19 supporting new GP surgeries. For DC21 change was not essential as support for public transport links is in DC15 and this would be applicable to District and Local Shopping centres. The change recommended to what is now DC30 on Provision of new open space was very specific for affordable housing where open space provision was reduced to ensure the viability of the scheme and remains a concern. For Policy DC31 the crime and antisocial concerns are mitigated by DC5 that requires all new development to have safe layouts and designs and paragraph 9.46 that refers to community safety, lighting and CCTV.

### **10.2. Proposed mitigation measures**

See section 7.5 of this document.

### **10.3. Uncertainties and risks**

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

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

## **11. MONITORING MEASURES**

No changes to the monitoring measures identified in section 11 of the original SA report have been advocated.

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

Some of the indicators included in the SA Framework are associated with targets in other plans and programmes. The relationship to the Regional Spatial Strategy and Ipswich Community Strategy are mentioned in Plan. The SA framework seeks to reuse indicators where ever possible to reduce the burden of data collection. It particularly uses indicators that are statutory requirements for the RSS and LDFs. New targets have been agreed for the Suffolk Community Strategy that includes some from the National Indicator Set that replaced the Best Value Performance Indicators in 2008/9. The SA indicators could be updated to reflect new measures introduced.

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

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

No changes to the monitoring proposals identified in section 11.2 of the original SA report have been advocated.

## **12. QUALITY ASSURANCE CHECKLIST**

For quality assurance checklist please see page 66 of the original SA report, to which this document is an addendum.

## **13. BIBLIOGRAPHY**

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

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

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

Scoping report (Suffolk Sustainability Appraisal Group, 2006)

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

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

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

Sustainability Baseline Data (Suffolk Sustainability Appraisal Group, 2006)

Sustainability Framework (Suffolk Sustainability Appraisal Group, 2005)

## **14. GLOSSARY**

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BREEAM	Building Research Establishment Environmental Assessment Method

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

## APPENDICES

### 1. Revised Sustainability Appraisal tables

The following tables only cover the ones that have been revised since the original assessment. Table 7.1 lists the policies that resulted in a change in the SA scoring. All other tables that have not changed have not been repeated and can be found in the original SA report.



## Appendix 1: Sustainability Appraisal Tables

Core Strategy Policy CS2: The Location and Nature of Development	Policy	“Do Nothing” Alternative	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	+ Locating development at main shopping centres could reduce trip generation	-/+ Dispersal of development could reduce or increase congestion		
ET2. To conserve soil resources and quality	+ May result on greenfield land being used in the northern fringe, but encourages use of PDL at the former Cranes site.	0 Unknown impact		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	+ Locating development at main shopping centres could reduce trip generation/length	-/+ Dispersal of development could reduce or increase congestion		
ET5. To improve access to key services for all sectors of the population	++ Aims to locate development at service centres and increase % of people living there	-- Will not locate development near all sectors of population		
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels	-- May involve development in flood risk areas to south and west of town centre	- Development may be more dispersed		Short term increase in development in the flood zone.
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance	+ Will encourage re-use of historic buildings in town centre			
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Reflects a concern for urban characterisation			
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need	++ Aims for open space/leisure areas to be dispersed throughout Ipswich; location near services mean people may walk/cycle rather than drive	- Dispersing leisure uses may encourage more car use		
HW2. To improve the quality of life where people live and encourage community participation	+ Aims for open space to be dispersed throughout Ipswich			
ER1. To reduce poverty and social exclusion	+ Locating development at key service centres reduces exclusion	- Will not spread development		
ER2. To offer everybody the opportunity for rewarding and satisfying employment	++ Encourages range of development uses and specifically ICT on major site			
ER3. To help meet the housing requirements for the whole community	+ Will spread development across town			
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ Promotes range of development in town centre and Cranes site.	+ Allows spread of development		
ER5. To revitalise town centres	+ Aims to focus development in the town centre	- Allows dispersal of development		
ER6. To encourage efficient patterns of movement in support of economic growth	+ Locating development at main shopping centres could reduce trip generation			
ER7. To encourage and accommodate both indigenous and inward investment	++Clear plan may encourage inward investment	-May not encourage development		
CL1. To maintain and improve access to education and skills for both young people and adults	++Flexibility to develop education buildings as required	-May hinder development of educational establishments	+Developing economy may improve skills	
CD1. To minimise potential opportunities for crime and anti-social activity	+ More leisure facilities may help reduce crime/anti-social activity			

<b>Core Strategy Policy CS4: Protecting Our Assets</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality	++ Addresses geological conservation	- Geological sites not as strongly protected		
ET3. To reduce waste	++ Use of recycled materials and waste reduction sought	- There may be increased waste produced		
ET4. To reduce the effects of traffic upon the environment	++ Use of local recycled materials reduces mileage. Safe urban layout	-Buying from further afield increases mileage		
ET5. To improve access to key services for all sectors of the population	++ Integration of residential, employment and community sites could improve access to services			
ET6. To reduce contributions to climate change	+Use of renewables encouraged	-Low carbon materials may be used		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	++ Recognises importance of nature/wildlife designations	- More scope for damage / loss		
ET9. To conserve and where appropriate enhance areas and sites of historical importance	++ Seeks to develop a policy for conservation areas	- More scope for damage		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Seeks to protect Conservation Areas	- More scope for damage		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	++ Recognises importance of nature/wildlife designations	- More scope for damage		
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	++ Protects and enhances green space			
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment			+Local jobs could increase as a result of using more local materials.	
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area			+Local builders and material suppliers may benefit	
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults			+ Could promote continuity which benefits education	
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy CS16: Green Infrastructure, Sport and Recreation</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	+ More green space could improve air quality	-No controls, allowing denser development could worsen air quality		
ET2. To conserve soil resources and quality	- Requirement may result in more land being needed for sport and recreation development	+ Would reduce amount of land needed for development		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population	+ Seeks to provide new country park			
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	+ Requires development s to provide public green space	- Limited new green space created and managed		
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	++ Protection for AONB plus public space could enhance townscape	- May reduce greenspace in townscape		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	+ Potential impacts on Orwell SPA recognised			Long term impacts of facilities on SPA need to be considered in AA
HW1. To improve the health of those most in need	+ Requires developments to provide public green space and encourages shared use of school sites.	- Less new green space created		
HW2. To improve the quality of life where people live and encourage community participation	+ Requires developments to provide public green space	- Less new green space created		
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy CS20: East-West Transport Capacity</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+/- Seeks to relieve air quality issues but discusses road building	- Air quality issues will not improve as traffic increases		
<b>ET2. To conserve soil resources and quality</b>	+ Promotes access to island site			
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	- Supports more road building, though also supports improvements to bus provision	- Air quality issues will not improve as traffic increases		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Transport provision and planning should improve access to town centre for Waterfront residents	- Access could suffer		
<b>ET6. To reduce contributions to climate change</b>	+ Better bus and pedestrian links may decrease car usage	- No policy could increase car use		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>	- Wet Dock crossing may damage wildlife site			
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	- Wet Dock crossing may damage Conservation Area			
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	- Wet Dock crossing may damage townscape			
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+ Linking green routes could encourage walking and cycling			- Building can cause air pollution in the short term
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Seeks to improve air quality in gyratory			-Wet dock construction could cause disturbance in the short term
<b>ER1. To reduce poverty and social exclusion</b>				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Improved road links may improve attractiveness to investment	- Poor transport links could hinder job access		+ Construction jobs could increase in the short term
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Improved road links may improve attractiveness to investment			
<b>ER5. To revitalise town centres</b>		- Access to the town centre could be limited		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Supports improvements to bus, rail and cycle provision but also more road capacity			
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Improved road links may improve attractiveness to investment	- Poor transport links could hinder investment		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>		- Access to education facilities may not be as strong		
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

<b>Core Strategy Policy DC5: Urban Design Quality</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	++ Recognises need for specialist design of buildings in and around AQMAs.			
ET2. To conserve soil resources and quality	+ Promotes urban greening			
ET3. To reduce waste	? Waste bins addressed, should refer specifically to recycling bins and centres			
ET4. To reduce the effects of traffic upon the environment	0/+ Provides car parking but also provides cycle storage			
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	0/+ Notes sustainable buildings			
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	++ Biodiversity addressed in policy			
ET9. To conserve and where appropriate enhance areas and sites of historical importance	+ Addressed in policy	- Areas could be developed to a less quality		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Addressed in policy	- Areas could be developed to a less quality		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	+ Aims to create a sense of place	0/- Development without a sense of place may hinder cohesion		
ER1. To reduce poverty and social exclusion	+ Sense of place could alleviate social exclusion			
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres	0/+ High quality building in urban areas could mean town centre is revitalised			
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity		0/- Development without a sense of place may increase crime		

Core Strategy Policy DC6: Tall Buildings	Policy	“Do Nothing” Alternative – No control of location	Secondary effects	Short, medium and long-term effects
ET1. To improve water and air quality	+ Microclimate addressed			
ET2. To conserve soil resources and quality	0/+ Tall buildings yield more dwellings per hectare	- More land will have to be used		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	0/+ Relationship to transport infrastructure addressed	- Could generate lots of traffic in what was a quiet area		
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	+ Sustainable design sought			
ET7. To reduce vulnerability to climatic events and increasing sea levels	+Sustainable design sought which could minimise impacts of runoff.			
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance		- Possible impact of buildings on a wide are		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		- Possible impact of buildings on a wide are		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community	++ Provides housing			
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres	0/+ Could help to revitalise town centres			
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC10: The Protection of Trees</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	0/+ Preserving trees could improve air quality			
ET2. To conserve soil resources and quality	+ Promotes retention of trees and hedgerows, benefitting soil quality			
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change	0/+ Preserving trees could improve air quality			
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	++ More habitats for species			
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	0 These areas are protected through other policy			
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment	0/- Could reduce the amount of land for employment use			
ER3. To help meet the housing requirements for the whole community	0/- Could reduce the amount of land for housing use			
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC15: Travel demand management</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	++ Seeks to reduce car travel and protect AQMAs	-- Emissions and car travel wouldn't be managed and could increase		
ET2. To conserve soil resources and quality				
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment	++ Seeks to reduce car travel	-- Emissions and car travel wouldn't be managed and could increase		
ET5. To improve access to key services for all sectors of the population	++ Access to varied transport should improve accessibility			
ET6. To reduce contributions to climate change	++ Seeks to reduce car travel	-- Emissions and car travel wouldn't be managed and could increase		
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity	0/+ Air and noise pollution addressed	- Noise pollution could affect species		
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	0/+ Air and noise pollution addressed	- Noise pollution could affect species		
HW1. To improve the health of those most in need	+ Making cycling easier should improve health	- Cycling and walking may be less viable.		
HW2. To improve the quality of life where people live and encourage community participation				
ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth	++ Addressed in policy	-- Emissions and car travel wouldn't be managed and could increase		
ER7. To encourage and accommodate both indigenous and inward investment				
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity	+Provides safe and convenient access to public transport			



## **Sustainability Appraisal of Ipswich Borough Council Core Strategy and Policies Development Plan Document**

Suffolk County Council Research and Intelligence group undertook a sustainability appraisal of the draft submission version of the above document in August 2009 as required by the Planning and Compulsory Purchase Act 2004.

Following consultation on the submission document a schedule of changes comprising minor word changes, clarifications, updates and additions was prepared in March 2010.

This schedule has been checked against the August sustainability appraisal with a view to identifying if any of the amendments are significant enough to trigger a change in the appraisal.

The check confirms that all the changes are minor and insignificant, not resulting in a need to change any scores with one exception.

### **DC4 Development and Flood risk**

The wording has been changed from

it reduces the overall risk from all forms of flooding  
to

it **does not increase** the overall risk from all forms of flooding

Sustainability Objective ET7 To reduce vulnerability to climatic events and increasing sea levels, previously received a high positive score because the policy sought to reduce the risk of flooding in line with the SA objective. However the wording change means that the impact is neutral – it is not going to reduce the impact but is not going to make it worse so the score is zero. When the impact of this change is considered in the context of the overall appraisal it has a very minor effect and does not change the conclusions.

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5 March 2010

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

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

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

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

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

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

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

### **CS10 Ipswich Northern Fringe**

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

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

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

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

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

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

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8 November 2010

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

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

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

Key to table

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

**of**

**Submission Core Strategy and Policies  
(As amended following the IBC Core Strategy  
Examination May/July 2011)**

**For Ipswich Borough Council**

**Update July 2011**



## **Updated Non-technical summary**

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

**1.2** This report sets out the results of the sustainability appraisal of the Ipswich Borough Core Strategy and Policies Document that will when formally adopted, form part of its Development Plan Framework.

**1.3** The sustainability appraisal has gone through several iterations as policies have developed. The main report on the draft submission Core Strategies and policies was completed in August 2009. Updates were provided in September 2009, March 2010 and November 2010 as policy wording was revised. Following the Examination on the plan in May and July 2011 further changes were proposed and the results are set out below.

**1.4** Baseline information on key aspects of the environment, economy and society were reviewed in the August 2009 Sustainability Appraisal report to reveal the key issues for Ipswich. Twenty two sustainability appraisal objectives were identified building on County wide work and the results of local views stemming from consultation in Ipswich. Their compatibility with the twelve plan objectives is high with every sustainability objective having at least one plan objective positively compatible.

**1.5** The sustainability appraisal has involved systematically reviewing all policies against the twenty two sustainability appraisal objectives, considering if and how those policies would further the objectives. The results are recorded in sheets, one for each policy. The level of impact is gauged on a scale from strong positive, positive, weak positive, neutral to weak negative etc. Some policies can have positive and negative impacts and others have uncertain impacts.

**1.6** In all 52 policies have been appraised: 20 Core Strategy and 32 Development control policies, all with the alternative of non-implementation. Only one policy was outscored by the alternative of non-implementation; however this is a policy which reflects national targets for house building as set in the East of England Plan (Regional Spatial Strategy). Although the level of house building has been reviewed in the course of the plan preparation it has not been greatly reduced and managing its possible negative impacts is a key challenge for the plan.

**1.7** Arising from the Examination a number of options have been tested for policy CS10 for housing development on greenfield land in the Northern Fringe. This looked at different timings for release of land and the order in which three parts of the larger site should be released.

Comparison of the overall results of the 4 policy options shows:

	Option	Cumulative score
1.	November 2010 A first phase of 1,000 -1,500 dwellings before 2021 on the site east of Henley Road and south of the railway line, including community facilities, railway crossing to link potential development phases and country park.	+3
2.	Proposed wording July 2011 As above but land made available at any time after the adoption of the Core Strategy and SPD.	+3.5
3.	i) No specific area for the first phase of the development up to 2021	-7.5
4.	ii) Either of both of the brown areas on the proposals map	-0.5

This confirmed that the proposed wording of CS10 post the Examination is the most sustainable option.

### **Core strategy likely significant effects**

**1.8** Implementation of the preferred policies as a group of policies has the potential to build and maintain sustainable communities in Ipswich in the long term. The plan should make a difference to the quality of life of where people live, improving access to services and water and air quality. The latter is a result of the policies that seek to conserve and reuse water (e.g. Sustainable urban drainage) and activities that should reduce the level of traffic and congestion thereby improving air quality.

**1.9** The plan will also encourage indigenous and inward investment through the quality of the urban environment it will create and this will help increase the number of jobs and level of prosperity. Social exclusion should be reduced by the implementation of policies to provide sustainable transport modes. However it was noted that achievement of the sustainability appraisal objective on minimising crime and anti-social activity was weak as security issues were not addressed in the context of high density development.

**1.10** The plan appears to be less effective at achieving the objective to reduce waste, as waste minimisation and recycling are not significantly embedded in policies. Although policies CS1 (sustainable development, encouraging renewable energy and water recycling), CS4 (protecting our assets, encouraging use of recycled materials in construction), and DC1, DC13 and DC14 (sustainable development, BREEAM standards, infill and subdivision) scored positively for waste reduction, there were missed opportunities in other policies. There is however a section of policy CS4 which states that all new developments must minimise waste generation throughout their construction period and lifetime. No statement about provision of community recycling facilities or household waste sites is evident.

**1.11** Preserving soil resources seems to be covered in the plan but now the housing land in the Northern fringe could come on line a lot earlier in the plan period it has lost some of its ability to prioritise use of previously developed land before greenfield. Although the plan has a target (60%), it is going to be a challenge for the IP-One Action Area Plan to promote the development of previously developed land if greenfield is easily available.

## **Mitigation**

**1.12** The original August 2009 appraisal revealed a number of aspects that needed to be mitigated, many of which are achieved by the application in tandem of other policies so no further action is required. Further changes to the wording of policies have meant that some of the original concerns have now been addressed – including weakness in promoting public transport routes, support for the provision of new GP surgeries and standards for provision of open space for affordable housing. The following sets out the common themes emerging and suggested mitigation actions:

**1.13** Flood risk: There is a need to ensure that properties in flood zones are designed in a way that is sensitive to flood risk in the short to medium term before the tidal barrier is completed. This is covered to some extent in policy CS18 where phasing of development is encouraged to ensure waterside dwellings are completed after the strategic flood defence is implemented but should be considered in greater detail in the IP-One Area Action Plan as this will cover the central area of the town, in the flood zone.

**1.14** Waste minimisation – the plan overall appears to do little to encourage waste minimisation. Reference is made to residential and non residential development conforming to BREEAM standards of construction which include design aspects to ensure that new development has planned space for 3 bins to facilitate recycling. Again in mitigation, the IP-One Area Action Plan can play a role in addressing waste minimisation issues resulting from high density development and waste from employment land and the Supplementary Planning Document for the Northern Fringe can consider possible actions appropriate for a newly developing community.

**1.15** Northern Fringe -The key mitigation measures required are for the SPD for the Northern Fringe to consider how it can be phased so as not to leave people with poorly developed services should house building slow. It should not allow multiple starts across the sites, as this will not give equal access to facilities until linking infrastructure is put in, will not be conducive to community network building and may make it more difficult to trigger or offer connectivity to a new primary school. The SPD needs to take into account that development might need to be phased to encourage continued take up of PDL elsewhere in the Borough. The SPD also needs to look at early implementation of the provision of green space/country park and links to paths into the Fynn Valley to encourage dog walking in this area, to take the pressure off the Deben and Orwell estuaries.

**1.17** Crime and anti-social activity – IP-One Area Action Plan should consider designing to minimise crime in high density development.

**1.18** It is proposed that all of the indicators included in the SA framework are monitored. Particular attention needs to be given to monitoring air quality to clarify the uncertainty in Table 1 concerning CS19 Provision of health services bringing together health services on the Heath Road site which is adjacent to an air quality hot spot. Other uncertainties in Table 1 for DC 5 Urban design quality and DC 21 District and local shopping centres can be avoided by careful design and layout.

## **Difference the process has made**

**1.19** The Borough Council has been working on its sustainability appraisal alongside the development of its Local Development Framework. A Scoping Report was produced and consulted upon and a sustainability appraisal undertaken at the Issues and Options phase of plan development during 2006 and 2007. As set out in

1.3 above, the sustainability appraisal has been updated several times and has informed the production of the Core Strategy documents and ensured that social, environmental and economic impacts were considered as policies were developed. Opportunities have been taken to tighten up on policy wording at various stages of the plan development. Each time the sustainability has been updated, the sustainability of the plan has improved.

1.20 A few weaknesses remain which can be considered by the council as it produces the IP-One Area Action Plan and Supplementary Planning Document for the Northern Fringe development.

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

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

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## Update to Sustainability Appraisal July 2011

### 1. Introduction

This report updates the Sustainability Appraisal undertaken for Ipswich Borough's Core Strategy and Policies, including the testing of additional options for the Northern Fringe site (CS10) and taking into account wording changes to policies following the Examination in Public in May and July 2011.

### 2. Testing of options for CS10 Northern Fringe

2.1 Appendix 1 sets out the SA undertaken in November 2010 for a first phase of 1,000 -1,500 dwellings before 2021 on the site east of Henley Road and south of the railway line, including community facilities, railway crossing to link potential development phases and country park.

2.2 Other options that have already been considered in previous appraisals include an assessment of the 3 sites for 4,500 dwellings as part of CS7 November 2010 SA; and a first phase of 1,000 -1,500 dwellings before 2021 (August 2009 SA) on the site east of Henley Road and south of the railway line, with no mention of community facilities, railway crossing to link potential development phases or country park. These are not included here to avoid confusion as policy wording has moved on and there is a need to focus on the changes that have been made.

2.3 Appendix 1 also gives new appraisals for the following policy options for CS10:

- Revised policy for CS10 following the Examination that envisages development of the first phase of up to 1,500 dwellings on the land east of Henley Road and south of the railway line, at the Northern Fringe at any time after the adoption of the Core Strategy and SPD.
- No specific area for the first phase of the development up to 2021
- Either or both of the brown areas shown on the proposals map (area 1; north of the railway line and between Henley Road and Westerfield Road; area 2 south of the railway line and between Westerfield Road and Tuddenham Road) coming forward as the first phase instead of the east of Henley road (blue site in the proposals map) before 2021 (still for 1000 – 1500 dwellings).

2.4 Comparison of the overall results of the 4 policy options shows:

Option	Cumulative score
November 2010	+3
Proposed wording July 2011	+3.5
i) No specific area	-7.5
ii) Either of both of the brown areas on the proposals map	-0.5

This confirms that the proposed wording of CS10 post the Examination is the most sustainable option. The detailed appraisals of each of the above are in Appendix 1.

### 3. Appraisal of proposed CS10 post Examination

3.1 The proposed policy wording is intended to give greater flexibility in bringing housing land forward and specifically says:

- a) that 1,000 dwellings could now commence **before 2021** on the land to the east of Henley Road and south of the railway line.
- b) As the principle of development will be agreed through the Core Strategy, the infrastructure developments and layout of the whole Northern Fringe area will

be considered in a supplementary planning document and this will need to be adopted before any planning permission is granted.

- c) Reference to delivery on previously developed land has been removed. The policy now just looks at issues with housing delivery, and if it was falling significantly short of requirements, the Council would consider allowing additional land in the Northern Fringe to be released for development prior to 2021.

The latter point has been interpreted to mean that up to 1,500 houses could potentially be given planning permission before 2021 – realistically this may mean 1,000 gaining planning permission in 2013 and a start on site could thereafter be made in 2014.

3.2 The sustainability appraisal of CS10 has been reconsidered with these parameters in mind. The conclusion is that overall level of impact has not changed greatly as a result of development starting earlier on the Northern Fringe site. Additional comments have been added relating to short, medium and long term impacts. (See appraisal sheet in Appendix 1)

3.3 The sustainability appraisal has not changed greatly firstly because many of the impacts will take place (e.g. loss of greenfield land, generation of waste) regardless of the timing and secondly due to the implementation of the Ipswich Major Transport Scheme. This multi-million pound scheme has received government funding and is due to be implemented within the next 3 years. This will provide new bus station facilities, improved cycle and pedestrian routes and updated Urban Traffic Management Control (UTMC). The latter is important in enabling traffic management through the town and will in particular help reduce air quality problems in the designated air quality management areas (AQMAs) in the centre of Ipswich.

Detailed comments on SA objectives:

3.4 **ET1** (Air quality) and E4 (Impact of traffic): The traffic from the development of the Northern Fringe would be managed by the UTMC that will be introduced as part of the Ipswich Major Transport Scheme so a major negative impact on the Air Quality Management Areas in the town centre (should they still exist) is not expected. There may be more congestion at key junctions very close to the Fringe development but the significance of this is not easy to predict given that a travel plan for the Northern Fringe development will be required and the Major Transport Scheme completed, offering sustainable transport options. Hence sustainable travel behaviour will be encouraged from the outset. Although the earlier start on the Northern Fringe will be before general improvements can be made to car technology this is not significant enough to justify changing the overall score for this SA objective.

3.5 **ET2** (Conserve soil resources and quality): A significant negative impact has already been recorded for this SA objective. Developing the Northern Fringe earlier than previously planned could act as a disincentive to developing brownfield (PDL) elsewhere in Ipswich. Policy CS 9 PDL target (as revised) states that from 2010 to 2027 at least 60% of development will take place on PDL, because the locational policy in CS2 focuses development primarily into central Ipswich and it will be reflected in the site allocations in the IP-One Area Action Plan. The latter will be approved after the Northern Fringe SPD. Bringing forward the potential start date on the Northern Fringe may undermine the ability to achieve the PDL target. However even if 1,500

houses went ahead on the Northern Fringe before 2021, this would only be 30% of the net additional dwellings required. Careful monitoring of take up of land will be required and early consideration given to the possibility of and need for phased development in the Northern Fringe. Care will need to be taken that infrastructure is appropriately provided and phased to avoid disadvantaging the emerging new community.

**3.6 ET5** (Access to services): In the longer term development of new community facilities has a beneficial impact on the new and surrounding community. However in the short term care needs to be taken to ensure development does not start in more than one location as this will not give equal access to facilities until linking infrastructure is put in, will not be conducive to community network building and may make it more difficult to trigger or offer connectivity to a new primary school. It is important that timely provision of infrastructure such as a doctors surgery, primary and secondary schools is made. This can be done in the SPD and subsequent planning applications so no change to the appraisal is justified or mitigation required.

**3.7 ET10:** The landscape of the Northern Fringe could change however the requirement for the adoption of Supplementary Planning Document (SPD) for the whole Northern Fringe development means that views to the area, particularly from the Fynn Valley SLA can be protected by careful layout and planting. The dropping of the prerequisite for preparation of the Site Allocation and Policies DPD (for the northern fringe development) will make no difference because the principle of development in the Northern Fringe area would already be agreed in principle if the Core Strategy is adopted.

**3.8 HW2** (Improve the quality of life): It is noted that the identified area in the policy will require the replacement of existing sports fields (as is made clear within changes to the supporting paragraphs to the Policy). Where ever the replacement facility goes will need to be accessible and amenity issues addressed (e.g. potential light pollution etc)

**3.9** In conclusion, the principle of development in the Northern Fringe will be established in the Core Strategy and the area east of Henley Road and south of the railway will be targeted first for development. The SPD will establish in more detail the location of housing, key facilities such as schools, health facilities, local shops and open space. Given that the Northern Fringe site is spread over a number of parcels of land and one is highlighted in the policy for development first, consideration should be given to the location of housing, local shopping, health and school facilities, the need for conservation of BAP species, and the location of landscaping within the sites. Furthermore in view of the concerns raised in ET2, the phasing of development may need to be considered as part of the SPD in case monitoring of the take up PDL triggers a need for policy review (which could include a slow down on the Northern fringe in order to stimulate take up of PDL.)

**3.10** The cumulative impact of this development with that proposed in Suffolk Coastal raises concerns for the potential impact on the Orwell and Deben SPAs/ RAMSARs. Mitigation will need to include the early provision of open space/country park (which is provided for within the strategy) for dog walkers with appropriate connections and signing to longer routes in the Fynn Valley. This needs to be set out in the SPD with high priority being given to their provision as soon as development begins.

#### **4. Changes to other policies as a result of the Examination**

4.1 Appendix 2 sets out all the changes that have been proposed to the plan following the Examination and the SA response. In some cases the changes are very minor, either being words or updating of the reasoned justification to policies. The SA has focused on the changes to policy wording. This has resulted in changes to the sustainability appraisal of 7 policies CS10 (dealt with above), CS20 Key Transport Proposals, DC4 Development and Flood risk, DC6 Tall buildings, DC 28 Non residential uses in residential areas, DC30 Provision of open space and sport and recreation facilities and DC 31 The density of residential development. These are in Appendix 3 which also includes updated sheets for CS9 PDL target and CS12 Affordable housing as some of the words have been updated but the overall impacts have not changed. It should also be noted that DC 24 has been deleted, as it was felt to duplicate DC28.

4.2 Most of the changes are very small, changing the score on only one objective. The biggest change is seen in CS 20 Key Transport Proposals due to the removal of text from the policy concerning the Wet Dock crossing and Northern bypass. Although these remain aspirations referred to in the supporting text, they are clearly not going to be achieved in the life time of this plan and it is for another plan to consider in the context of future changes and policies. The overall impact of CS20 has gone from +3 to +14 reflecting the benefits of implementation of the Ipswich; Transport Fit for the 21<sup>st</sup> century scheme, support for freight on rail and managing movements on the Waterfront.

4.3 DC30 Provision of open space has decreased in sustainability because by introducing the possibility of negotiation for all types of development on the basis of viability, the result could be less new open space, sports and recreational facilities.

4.4 The updated appraisal scores have been put into the overall cumulative matrix (Table 1), previously Table 8.1 in the August 2009 SA. The revisions have made the plan even more sustainable, as after taking out DC24 into account, all the changes have had positive effects with the exception of DC4 Development and flood risk. This is because the policy formerly said it would seek to reduce the overall risk of flooding; now it only seeks to ensure development will not increase the overall risk of flooding. This latest appraisal now takes into account that in the supporting text there is more detail added about standards to be expected and that there will be tight control on basement dwellings, so instead of the impact on ET7 To reduce vulnerability to climatic events and increasing sea levels, being neutral (as suggested in March 2010 update) it is now regarded as slightly positive.

4.5 The overall balance of the appraisal has not changed. It remains strongest in its consideration of quality of life and reducing the impact of traffic on air quality. The areas which are of most concern are reducing waste, and reducing vulnerability to climatic events and rising sea levels.

4.6 The main concern now about CS10 is that it could allow an earlier start on housing in the Northern Fringe and the possible knock on impact this might have on development on PDL - as set out in 3.5 above. Furthermore the cumulative impact of this development with house building in Suffolk Coastal raises concerns about the potential impact on the Orwell and Deben RAMSARs of increased recreational use. However, in the case of Ipswich, the strategy provides for mitigation of this via Policy CS16.



## **5. Mitigation measures**

The key mitigation measures required are for the SPD for the Northern Fringe to consider how it can be phased so as not to leave people with poorly developed services should house building slow. It should not allow multiple starts across the sites. This needs to take into account that development might need to be phased to encourage continued take up of PDL elsewhere in the Borough. The SPD also needs to look at early implementation of the provision of green space/country park and links to paths into the Fynn Valley to encourage dog walking in this area, to take the pressure off the Deben and Orwell estuaries.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	T
ET1. To improve water and air quality	++	+	+	0	++	+	-	+	+	+/-	+	0	-	++	+	+	++	0	?	+	++	+	0	++	++	+	0	+	0	0/+	0/+	++	0	0/+	++	+	++	0/-	+	+	0	0	0	+/-	+0	++	0/+	0	0	+	+	0	39	
ET2. To conserve soil resources and quality	+/-	+	++	++	0	+	-	+	+	--	+	+	+	++	+/-	-	0	+	+	0	0	0	+/-	+/-	+	0/+	0	0	+	+	+	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20			
ET3. To reduce waste	++	0	0	++	0	0	-	0	0	0/-	+	0	-	-	0	0	+	0	-	0	++	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	0/-	0/-	0	0	+	0	0	0	0	0	0	4		
ET4. To reduce the effects of traffic upon the environment	+	+	++	++	++	+	-	+	+	+/-	0/+	0	-	++	+	0	++	0	+	+	0	0	0	0	0/+	0/+	0	0	0	0	0	0	+	++	++	+	++	0/-	+	+/-	-	+	+	-	0	0	0/+	0	0	+	0	0	27.5	
ET5. To improve access to key services for all sectors of the population	0	++	++	++	++	+	0	+/-	+	+	++	0	0	-	++	+	+	0	+	+	++	0	0	0	0	0	0	0	0	0	0	0	0	0	++	+	0	0/+	0	0/+	+	+	+	0	0	0	+	+	+	?	0	++	32	
ET6. To reduce contributions to climate change	++	0	+	+	++	0	-	+	0	0	0	0	-	-	+	0	++	0	+	+	0	++	0	0	0/+	+	0	0	0	0	0	0	0	0	0	++	+	++	0/-	+	0	0/+	+	+	0	0	0/+	0/+	0	0	0	0	23.5	
ET7. To reduce vulnerability to climatic events and increasing sea levels	++	--	-	0	0	0	-	-	-	+	++	0	-	0	0	0	+	++	0	0	++	0	0	0/+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	5.5	
ET8. To conserve and enhance biodiversity	0	0	0	++	0	+	-	0	-	+/-	++	0	0	0	-	+	+	0	--	0	0	0	0/+	0	++	0	0	0	0	++	+	-/+	-	0	0/+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0/+	+	++	0	10.5
ET9. To conserve and where appropriate enhance areas and sites of historical importance	0	+	+	++	0	0	-	+	+	?	++	0	+	0	-	0	+	0	0	+	0	0	0	0	+	+	0	++	+	0	0	0	-	+	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	++	0	18		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	0	+	+	+	0	0	-	+	+	0/-	++	0	0	-	-	++	+	0	0	+	0	0	0	0	+	+	+	+	++	++	0	++	0/+	-	+	0	0	0	+	0	0/-	0/-	-	0	0	0	0	+	+	+	+	0	0	20
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs	0	0	0	++	0	+	0	0	+	+	++	0	0	0	0	-	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	++	0	11.5		
HW1. To improve the health of those most in need	0	++	+	0	++	+	0	+	0	0/+	+	0	0	+	0	+	++	0																																				

DC 24 was deleted following the Examination in July 2011.

## Appendix 1: Appraisal of options for CS10

In November 2010 the County Council reviewed the Sustainability appraisal prepared in August and September 2009 for the Core Strategy and Policies Development Plan Document. The wording of CS10 in November 2010 was as follows:

### **Policy CS10 – Ipswich Northern Fringe**

Land at the Northern Fringe of Ipswich, north of Valley Road/Colchester Road and between Henley Road in the west and Tuddenham Road in the east, will form the main source of supply of housing land in Ipswich after 2021.

However, due to the limited availability of previously developed land in the rest of the town, the delivery of up to 1,000 dwellings will be expected to commence during the plan's second phase on land to the east of Henley Road and south of the railway line. The site will be identified through the Site Allocations and Policies document. A prerequisite for any development being granted planning permission in the Northern Fringe will be the prior adoption by the Council of a supplementary planning document providing a development brief to:

- a. guide the development of the whole area; and
- b. identify the infrastructure that developments will need to deliver on a comprehensive basis alongside new housing, including community facilities and, at an appropriate stage, the provision of a railway crossing to link potential development phases, in the interests of sustainability and integration; and
- c. set out a schedule of infrastructure charges.

The Borough Council will start to prepare the supplementary planning document as soon as the Core Strategy is adopted.

Any development will maintain an appropriate physical separation of Westerfield Village from Ipswich and include green walking and cycling links to Westerfield Station, and provide the opportunity for the provision of a country park within the Northern Fringe as envisaged by CS16 and as shall be more particularly identified in the SPD.

Should housing delivery on previously developed land sites at 2015 be falling significantly short of requirements, the Council would at that time need to consider allowing additional land in the Northern Fringe to be released for development prior to 2021.

The supporting text 8.107 stated *“The indicative capacity at the Northern Fringe identified in the Strategic Housing Land Availability Assessment is about 4,500 dwellings. This policy deals with the delivery of up to the first 1,000 of them. When determining its views the precise number and timing of delivery of dwellings needed at the Northern Fringe, the Council will use a range of evidence including etc.”*

The supporting text at 8.113 said *At most , the Council envisages that this might mean a maximum of 1500 dwellings would be required in the northern fringe in the second phase of the pan (i.e. ready for occupation between 2016 and 2021).*



November 2010 Appraisal of CS10

<b>Core Strategy Policy CS10: Ipswich Northern Fringe</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+/- May attract more traffic to the northern fringe of Ipswich, however proximity to Westerfield station by walking and cycling addressed			
<b>ET2. To conserve soil resources and quality</b>	-- Use of greenfield land for development	0 Greenfield sites could be allocated elsewhere		
<b>ET3. To reduce waste</b>	0/- Housing development will increase waste			
<b>ET4. To reduce the effects of traffic upon the environment</b>	+/- May attract more traffic to the northern fringe of Ipswich, however proximity to Westerfield station by walking and cycling addressed			
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Increased community facilities and provision of a railway crossing that will link phases of the development and assist local accessibility.			
<b>ET6. To reduce contributions to climate change</b>				
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	+ Sites unlikely to be in flood risk areas			
<b>ET8. To conserve and enhance biodiversity</b>	+/- Greenfield land development will result in loss of biodiversity but the provision of a Country Park will provide opportunity to retain and enhance habitats.			
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>				
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	0/- Landscape of northern fringe could change	+ Landscape of northern fringe maintained		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	+ Sites likely to be away from designated areas			
<b>HW1. To improve the health of those most in need</b>	0/+ new facilities may include health facilities			

<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Quality of life should increase with more community facilities and provision of Country Park			
<b>ER1. To reduce poverty and social exclusion</b>				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>				
<b>ER3. To help meet the housing requirements for the whole community</b>	++ Provides housing growth	- Less housing likely to be delivered		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>				
<b>ER5. To revitalise town centres</b>				
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>				
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

In July 2011 Ipswich Borough supplied the following revised wording for CS10 and requested Suffolk County Council to update the sustainability appraisal.

**Policy CS10 – Ipswich Northern Fringe**

Land at the Northern Fringe of Ipswich, north of Valley Road/Colchester Road and between Henley Road in the west and Tuddenham Road in the east, will form the main source of supply of housing land in Ipswich after 2021.

However, due to the limited availability of previously developed land in the rest of the town, the delivery of 1,000 dwellings will be expected to commence prior to 2021 on land to the east of Henley Road and south of the railway line. A prerequisite for any development being granted planning permission in the Northern Fringe will be the prior adoption by the Council of a supplementary planning document providing a development brief to:

- d. guide the development of the whole Northern Fringe area;
- e. identify the infrastructure that developments will need to deliver on a comprehensive basis alongside new housing, including community facilities and, at an appropriate stage, the provision of a railway crossing to link potential development phases, in the interests of sustainability and integration; and
- f. set out a schedule of infrastructure charges.

The Borough Council will start to prepare the supplementary planning document as soon as the Core Strategy is adopted.

Any development will maintain an appropriate physical separation of Westerfield Village from Ipswich and include green walking and cycling links to Westerfield Station, and provide the opportunity for the provision of a country park within the Northern Fringe as envisaged by CS16 and as shall be more particularly identified in the SPD.

Should housing delivery be falling significantly short of requirements, the Council would at that time need to consider allowing additional land in the Northern Fringe to be released for development prior to 2021.

The supporting text 8.107 was also changed *“The indicative capacity at the Northern Fringe identified in the Strategic Housing Land Availability Assessment is about 4,500 dwellings. When determining its views the precise number and timing of delivery of dwellings needed at the Northern Fringe, the Council will use a range of evidence including etc*

The following options were also provided and are appraised alongside the preferred policy wording.

- i) No specific area for the first phase of the development up to 2021
- ii) Either or both of the brown areas shown on the proposals map (area 1; north of the railway line and between Henley Road and Westerfield Road; area 2 south of the railway line and between Westerfield Road and Tuddenham Road) coming forward as the first phase instead of the east of Henley road (blue site in the proposals map) before 2021 (still for 1000 – 1500 dwellings).

July 2011 Appraisal of CS10 and options

<b>Core Strategy Policy CS10: Ipswich Northern Fringe</b>	<b>Policy</b>	<b>(i) No specific area (all 3 at once or any one)</b>	<b>(ii) Either or both instead of proposed</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+/- May attract more traffic to the northern fringe of Ipswich, however proximity to Westerfield station by walking and cycling addressed.	+/- May attract more traffic to the northern fringe of Ipswich, however proximity to Westerfield station by walking and cycling addressed.	+/- May attract more traffic to the northern fringe of Ipswich, however proximity to Westerfield station by walking and cycling addressed.		Earlier implementation may have implications for AQMAs in town centre as clean car technology will not have moved on so quickly.
<b>ET2. To conserve soil resources and quality</b>	-- Use of greenfield land for development	-- Use of greenfield land for development	-- Use of greenfield land for development		
<b>ET3. To reduce waste</b>	0/- Housing development will increase waste	0/- Housing development will increase waste	0/- Housing development will increase waste		
<b>ET4. To reduce the effects of traffic upon the environment</b>	+/- May attract more traffic to the northern fringe of Ipswich, however proximity to Westerfield station by walking and cycling addressed. Ipswich Major Transport scheme will be largely completed before development commences.	- Development in 3 areas at once will not offer sustainable transport routes through the Northern fringe from the outset and will be likely to encourage more car use initially.	- North area distances from town centre employment likely to encourage car use with no opportunity for service employment in site south of rail line.	(i) Will be more difficult to encourage sustainable transport travel from outset if north developed first without appropriate links through southern site.	Travel Plan will be required plus completion of Ipswich Major Transport Scheme will mean sustainable travel behaviour can be encouraged from outset.
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Increased community facilities and provision of a railway crossing that will link phases of the development and assist local accessibility.	- Development in 3 areas at once (or one in particular) means some likely to have poor access to new facilities depending where they are located.	- Depends which area SPD envisages new facilities but would be difficult to link these two without east of Henley Road site.		
<b>ET6. To reduce contributions to climate change</b>		- May be more difficult to provide renewable energy if development spread across 3 sites or uncertainty over which site will start first.			
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	+ Sites unlikely to be in flood risk areas	+/- Small part of North site is in national flood zone 2	+/- Small part of North site is in national flood zone 2		



<b>ET8. To conserve and enhance biodiversity</b>	+/- Greenfield land development will result in loss of biodiversity but the provision of a Country Park will provide opportunity to retain and enhance habitats.	- Greenspace may not be in place if 3 small starts made.			
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	? Site contains known archaeological finds, metal work, pottery and an enclosure. Would need further investigation	? Sites south of railway, contains known archaeological finds, metal work, pottery and an enclosure. Would need further investigation	? Some finds on site south of railway and between Westerfield and Tuddenham Roads. Would need further investigation		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	0/- Landscape of northern fringe could change	0/- Landscape of northern fringe could change	0/- Landscape of northern fringe could change		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	+ Site likely to be away from designated areas but there could be a cumulative effect with other housing proposals east of Ipswich. This is addressed in the Appropriate Assessment.	+ Sites likely to be away from designated areas	+ Sites likely to be away from designated areas		
<b>HW1. To improve the health of those most in need</b>	0/+ new facilities may include health facilities	0/+ new facilities may include health facilities	0/+ new facilities may include health facilities		
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Quality of life should increase with more community facilities and provision of Country Park. Sports fields will need to be replaced.	- Start on 3 sites at once may not give equal access to facilities until linking infrastructure put in.	+ Quality of life should increase with more community facilities and provision of Country Park.		Supplementary planning document should deal with phasing of development to minimise short term disadvantages in access to services.
<b>ER1. To reduce poverty and social exclusion</b>		- Start on 3 sites at once will not be conducive to community network building as will be physically separated by railway initially			
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>		- North site is less well related to existing employment opportunities in town centre			
<b>ER3. To help meet the housing requirements for the whole community</b>	++ Provides housing growth	++ Provides housing growth	++ Provides housing growth		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>					

ER5. To revitalise town centres					
ER6. To encourage efficient patterns of movement in support of economic growth					
ER7. To encourage and accommodate both indigenous and inward investment					
CL1. To maintain and improve access to education and skills for both young people and adults		- Start in 3 areas will make it more difficult to offer connectivity to new primary school			
CD1. To minimise potential opportunities for crime and anti-social activity					

**Cumulative impacts:** it is now known that Suffolk Coastal District Council are proposing 2,100 dwellings to be built as part of their Core Strategy in the east of Ipswich on land near Adastral Park, east of the A12. This could have a cumulative impact on the pressure for recreational use of the Deben Estuary Special Protection Area and RAMSAR site. (The scale of development could have implications for recreational use of the Orwell estuary but the Appropriate Assessment concluded that these would be modest.) The Appropriate Assessment for IBC and SCDC has identified the need for a country park in the north/east area of Ipswich to ensure that no adverse impact occurs in the Deben Estuary. Foxhall waste tip site will not be available for development as a park in the plan periods (IBC and SCDC) so there is a need for a different provision within the plan area. This could include new paths and open space provision within the developments, in particular to serve dog walkers. IBC has addressed this through the commitment to the country park (and other mitigation measures) in CS16 and CS10.

**Appendix 2: Summary of changes to SA post Inquiry covering other policies  
(Dated 17 May 2011)**

The following changes have been provided and incorporated into the SA summary matrix where they have resulted in changes to the appraisal. (**Bold** text signifies policy wording and underlining where new words have been added)

Policy No.	Change	Impact on SA
CS4	Revised wording as provided in ECD09 Sustainable development Protecting our assets – Addition of explanatory text “Development at the Northern Fringe will provide an opportunity to contribute to biodiversity”.	No – September 2009 Addendum sheet still appropriate. This is a minor change to the explanatory text and has already been taken into account in the appraisal of CS4 as a result of CS4a).
CS12	Revised wording as provided in ECD02 Affordable housing – Main change is <b>“At least 80% of affordable housing provision should consist of social rented housing, <u>subject to viability</u>”</b> .	No – August 2009 SA sheet was reconsidered and addition of these words made no impact because the supporting text already explained that it might consider a lower % if it was shown that development would not otherwise be viable. This could be important to developing PDL. Sheet wording updated to make this clearer.
CS14	Revised wording as provided in ECD010 Retail – deletion of “The Council will also limit the size of shops permissible at the waterfront”. Also minor changes to references. Deletion of para 8.161	No – August 2009 SA sheet is still appropriate. The market will decide the size of shops that are viable on the Waterfront and DC23 applies to the Waterfront as to other locations.
DC3	Revised wording as provided in ECD11 Provision of outdoor amenity space in new and existing developments <b>“Provision will be in accordance with the following standards <u>unless this would unavoidably conflict with the need to meet other density and urban design requirements of the plan or an applicant is able to demonstrate that a lower figure would be acceptable having regard to the particular circumstances of the proposals. In all cases applicants will be expected to demonstrate that adequate provision of private outdoor amenity space will be provided for the likely occupancy of the proposed dwellings.</u>”</b>	No - August 2009 SA sheet is still appropriate. Policy provides flexibility but still requires that adequate provision of outdoor amenity space will be provided.
DC4	Policy wording provided. Development and Flood risk Policy wording changed in March 2010 (from it reduces to does not increase the overall risk of all forms of flooding) New supporting text for standards to be applied includes restriction on basement dwellings.	Yes –March 2010 SA sheet updated to reflect interpretation of standards given in new supporting text.

DC6	<p>Revised wording as provided in ECD11 Tall buildings Word “only” deleted from first sentence so policy refers to tall buildings anywhere in the Borough. Criterion k. deleted “no adverse effect on the setting of listed buildings” and reference to the Provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 added to the reasoned justification. Sentence added to policy: <b>“In other locations within the Borough proposals for tall buildings may exceptionally be considered to be appropriate if it can be demonstrated satisfactorily that they satisfy criteria a. to j. of the policy and would not harm the character and appearance of the area.”</b> Supporting text clarifies that the strategic views across Ipswich will be identified in the IP-One Area Action Plan.</p>	<p>Yes – September 2009 SA Addendum updated to reflect the protection to the character and appearance.</p>
DC7	<p>Revised wording as provided in ECD010 Public Art <b>“Major developments shall include a substantial public art proposal likely to be equivalent to about 1% of the construction contract value of the development scheme <u>unless it can be demonstrated that this percentage would render the scheme unviable or would be disproportionate to the nature, size and location of the development.</u> Proposals must be fully integrated into the proposed development at the design stage.</b></p>	<p>No – August 2009 SA still appropriate. The original assessment did not think 1% would be a disincentive to investment so the additional wording has no impact on the appraisal.</p>
DC11	<p>Revised wording as provided in ECD011 Central Ipswich Skyline <b><i>“Developments will only be permitted where they do not seriously disrupt this setting, especially when viewed from <u>sensitive locations</u> key view points.</i></b> Key viewpoints will be identified in the IP-One Area Action Plan.</p>	<p>No – August 2011 SA still appropriate</p>
DC12	<p>Revised wording as provided in ECD011 Extensions to dwellings houses and the provision of ancillary buildings a. to be deleted and replaced by <b>a. “would not result in more than approximately 50% of the useable private garden area of the original dwelling house being occupied by buildings”.</b></p>	<p>No – August 2009 SA still applies as garden space will still be retained.</p>
DC20	<p>Revised wording as provided in ECD010 The Central Shopping area Very minor word changes clarifying that shopping areas will be defined through the IP</p>	<p>No – August 2009 SA still appropriate.</p>

	one Area Action plan	
DC21	Revised wording as provided in ECD010 District and Local centres Sub clause a. deleted: 'In the case of food supermarkets, they should not exceed 1,500 sqm in scale'. Substituting c. i with <b>'the unit does not occupy a prominent position in the Centre'</b> . Substitute the last sentence in policy DC21 with (to remove 'if') <b>'Development of the northern fringe in accordance with policy CS10 will require the provision of a new district centre'</b> .	No – August 2009 SA still appropriate. Supporting text still gives an indication of what is regarded as an appropriate scale. Market will largely dictate viable size of development
DC23	Revised wording as provided in ECD010 Major Retail proposals Outside Defined Centres Sub clause a. the need for development deleted Keep b. <b>the appropriate scale of development</b> Change d. <b>to avoiding significant adverse impact on existing defined centres</b> Delete 9.126 second bullet.	No - August 2009 SA still appropriate.
DC24	Revision as provided in ECD11 Loss of residential accommodation Policy deleted due to duplication with DC28.	Yes – August 2009 SA sheet removed and overall assessment of impact of plan updated along with other changes.
DC25	Revised wording as provided in ECD02 Affordable housing – references updated and <b>a) is designed and built to at least the same standard as the market housing, including the appropriate level of the Code for Sustainable Homes</b> ". Final paragraph moved to policy CS12. Word 'tenure' deleted so policy starts <b>'The appropriate type and mix will be determined..'</b>	No – August 2009 SA sheet still appropriate. Previous policy wording already stated affordable housing should be indistinguishable from market development and wording change does nothing to change this.

CHANGES TO THE CORE STRATEGY PROPOSED AT HEARINGS DURING EXAMINATION WEEKS 2 AND 3, JULY 2011

Policy / paragraph	Change	Impact on SA
Matter 1 Spatial Strategy		
Chapter 6 Paragraph 6.8 Objective 6	Objective 6 second bullet - change should to could: 'Additional east-west highway capacity could be provided within the plan period ....'	No
Chapter 1 New paragraph under sub heading 1.12	Add reference to the Council's intention to review the Core Strategy starting in 2012/13 The Council anticipates starting a review of the Core Strategy in 2012/13.	No
Chapter 12, paragraph	Add reference to the Council's intention to review the Core Strategy starting in 2013 to chapter 12.	No

Policy paragraph /	Change	Impact on SA
12.3	Suggest addition to para 12.3: '..through the Annual Monitoring report and it is therefore anticipated that a review would be commenced in 2012/13.'	
Key diagram	Council to improve the key diagram: - improve print quality, use stronger colour, better represent the Northern Fringe policy CS10 (e.g. use areas of hatching to convey the general extent of the area), revisit illustration of green corridors etc, and make it larger.	No
<b>Matter 7 Local Economy</b>		
Table 3 (renumbered to Table 5) following para. 8.143	IBC to clarify the figures and update the table to reflect the GVA study or if not explain why not.	No
New para 12.4 needed	Joint monitoring through AMR required. IBC to draft new paragraph 12.4 to reflect this. Suggested wording: '12.4 Delivery within the Ipswich Policy Area will be monitored through a joint monitoring process with other relevant authorities'.	No
CS13 para 8.148	Para 8.148 needs limited amendment to delete reference to extension to district centre. Delete final sentence of para 8.148 and replace with new wording. 'The Council may be prepared to consider an element of enabling retail development on the site providing it complies with PPS4 and Policy DC23.'	No
Policy CS2 clause d.	CS2 clause d. second part to be deleted 'growth in the ICT and other related and creative arts sectors;' and replaced as follows CS2 d. <b>'Promoting a strategic employment site at Cranes Nacton Road to support economic development and jobs growth;'</b>	No – September 2009 SA still appropriate. Updating the wording to reflect general jobs growth rather than specifically ICT does not change the assessment.
Policy DC26	Protection of employment land Rewording to improve the policy's clarity and flexibility including deletion of c. the existing use is generating unacceptable adverse impact and replacement with <b>"It can be demonstrated to the Council's satisfaction that the proposed use is ancillary to and supports existing employment uses.."</b>	No – Sub clause a still allows consideration of environmental considerations and aims to protect employment land.
Policy DC28	Add wording to DC28 to make it more flexible to make it clear in what circumstances employment use of a dwelling might be allowed. <b>a. would not involve the loss of a dwelling unless the use provides a necessary community facility <u>or would have significant benefits to the local economy.</u></b>	Yes – August 2009 SA updated to reflect greater flexibility on employment uses.

Policy paragraph /	Change	Impact on SA
<b>Matter 2 Location of new homes</b>		
CS19 para 8.221	Amend paragraph 8.221' The Strategic Housing Land Availability Assessment 2009 identified this as a site that would be appropriate (in part at least) for a housing allocation for approximately 350 homes. Accordingly, the reallocation of the site for these purposes will be dealt with through the Site Allocations and Policies development plan document.'	No – August 2009 SA recognises possibility of housing development at St Clements site.
Policy DC31	DC31 amend wording in point e) to make it clear that the reference to housing needs is not just about affordable housing need.  <b>e) a different approach is demonstrated to better meet <u>all</u> housing needs in the area;</b>	Yes – Flexibility in meeting homes needed has strengthened achievement of ER3.
<b>Matter 3 Northern Fringe</b>		
Proposals Map	Amend wording on key to proposals map to clarify the status of the proposed first phase of development (i.e. the blue area on the map. ).	No
Policy CS10	Revised wording – development of first phase of up to 1,500 dwellings at Northern Fringe can come forward anytime after adoption of Core Strategy and SPD.	Yes – revised sheet prepared and attached and slotted into overall appraisal summary.
Policy CS9	Update policy CS9 to reflect changes to CS10 – i.e. reduce pdl target and extend timescale to cover plan period <b>'From 2010 to the end of the plan period in 2027, at least 60% of development...</b>	Words used in SA updated but no change to assessment.
Objective 3	Make subsequent corresponding changes to references from 70% to 60% This affects only Objective 3, in paragraph 6.8 Objectives, and Chapter 11.	No
Policy CS7	Delete in policy CS7 the sentence 'Housing allocations will be made and released in two phases: Phase 1: 2010 to 2015 (5 years) Phase 2: 2015 to 2021 (6 years)'	No – Need for greater flexibility in timing of housing provision was not seen as an SA issue.
<b>Matter 10 Infrastructure</b>		
	Delete references to Building Schools for the Future	No
CS17 para 8.190	Make paragraph 8.190 wording clearer in relation to the CIL regulations and position  The second sentence of Paragraph 8.190 is amended to read:  The Government brought into force Community	No

Policy paragraph /	Change	Impact on SA
	<p>Infrastructure Levy (CIL) Regulations in April 2010, which were further amended in April 2011, and which indicate that CIL is optional for councils.</p> <p>Paragraph 8.191 is amended to read:</p> <p>Therefore the Council will adopt a standard charge approach to the delivery of infrastructure. This will run until 2014 at which time pooled contributions will not be possible under CIL regulations. At this time the Council will move to a CIL type approach.</p>	
Policy CS19	<p>Policy CS19 final paragraph of policy, which refers to any health care facilities, is to be reconsidered and clarified so that the wording refers to only new health facilities and not extensions to existing facilities.</p> <p>Proposals to develop additional, <u>new</u> local health facilities such as GP surgeries will be acceptable provided that they are located in or adjacent to the town centre or a district or local centre.</p>	No
DC4	Policy DC4 the Council proposes the changes to the explanatory text as set out in its statement of common ground with the Environment Agency (to reflect the level 2 SFRA).	Already considered above
6.16	Chapter 6 – other minor changes to be made as set out in SoCG with Environment Agency	No – helpful additional detail.
Policy DC30	<p>Policy DC30. Provision of new open spaces and sport/recreation facilities</p> <p>Re word the final word paragraph of the policy as follows to provide sufficient flexibility in the application of the standards to all schemes.</p> <p><b>‘The requirement will apply to all schemes, unless it can be demonstrated that this would lead to the scheme being unviable and/or site specific matters so justify. In such cases ...’</b></p>	Yes – Likely to be less open space provided due to ability to negotiate a reduction for any development on the grounds of viability.
Chapter 12 new addition	<p>Make it more clear in chapter 12 what the appropriate mechanisms are for monitoring the delivery of infrastructure specifically</p> <p>The Local Development Framework Annual Monitoring Report will review the progress of these arrangements as well as progress on delivering the major projects <u>and infrastructure requirements</u> outlined in Chapter 10, and performance against the targets set out in Chapter 11. <u>Delivery of jobs within Ipswich Policy Area will be monitored through a joint monitoring process with other relevant authorities.</u></p>	No
Matter 9 Transport		
Policy CS20 and supporting text	<p>Revised wording and title change</p> <p>Key Transport Proposals</p> <p>Major alterations to policy CS20 to decrease status of</p>	Yes – Removal of this wording has made the policy



Policy paragraph /	Change	Impact on SA
	<p>Northern Bypass and Wet Dock Crossing by removing them from the policy and including them in the explanatory text.</p> <p>Deleted text concerning Star Lane gyratory and Wet Dock crossing so now reads:</p> <p><b>“The Council supports the ‘Ipswich: Transport Fit for the 21<sup>st</sup> Century’ scheme, which aims to reduce dependency on the private car by 15% within the lifetime of the Plan. This will improve bus station provision, passenger information, shuttle bus provision and pedestrian links between the Central Shopping Area, the railway station and Waterfront. The Council also supports the completion of the upgrading of the Felixstowe to Nuneaton rail line. To assist with this the Council will protect, for rail use, the line of the ‘Bacon Chord’ near Hadleigh Road, Ipswich.</b></p> <p><b>In the short term the Council will look to close the Waterfront Northern Quays route to general traffic, maintaining access only for pickup/drop off and the shuttle bus.”</b></p>	more sustainable due to anticipated impact of Wet Dock crossing on wildlife and conservation area.
Policy CS5	Policy CS5, add reference to bus and rail in brackets after ‘... by public transport.’ ... <b>‘by public transport (bus and rail).’</b>	No
Policy DC18	DC18 – revise wording of second sentence to make it clearer with regard to where minimum and, separately, maximum standards apply (i.e. max for IP One, min for Northern Fringe and anywhere outside of IP One area and max for all non residential uses).	No – August 2009 SA still applies. More a clarification than a material change to what is intended to be achieved.
Chapter 6 para 6.8 Objective 6	Para 6.8, Objective 6, 3rd bullet, delete reference to monorail.	No

### Appendix 3: Revised appraisal for other policies

<b>Core Strategy Policy CS9: PDL target</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>
<b>ET1. To improve water and air quality</b>	+ PDL is likely to be closer to existing services than new greenfield sites, reducing trip generation	+ PDL is likely to be closer to existing services than new greenfield sites, reducing trip generation	
<b>ET2. To conserve soil resources and quality</b>	+ Adopts PPS3 standard 60% of residential development should be on PLD.	+ Adopts PPS3 standard 60% of residential development should be on PLD.	
<b>ET3. To reduce waste</b>			
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ PDL is likely to be closer to existing services than new greenfield sites, reducing trip generation	+ PDL is likely to be closer to existing services than new greenfield sites, reducing trip generation	
<b>ET5. To improve access to key services for all sectors of the population</b>	+ PDL is likely to be closer to existing services than new greenfield sites	+ PDL is likely to be closer to existing services than new greenfield sites	
<b>ET6. To reduce contributions to climate change</b>			
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	- Much PDL may be in flood risk zones	- Much PDL may be in flood risk zones	
<b>ET8. To conserve and enhance biodiversity</b>	- Building on PDL may harm biodiversity	- Building on PDL may harm biodiversity	
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+ Building on PDL may enhance sites of historical importance if they are currently run down	+ Building on PDL may enhance sites of historical importance if they are currently run down	
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Building on PDL may enhance townscape if it is currently run down	+ Building on PDL may enhance townscape if it is currently run down	
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>	+ Using PDL reduces need for new development on/near protected sites	+ Using PDL reduces need for new development on/near protected sites	
<b>HW1. To improve the health of those most in need</b>			
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Developing on PDL may improve currently run down areas	+ Developing on PDL may improve currently run down areas	

<b>ER1. To reduce poverty and social exclusion</b>	+ PDL is likely to be closer to existing services than new greenfield sites	+ PDL is likely to be closer to existing services than new greenfield sites	
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	- Use of PDL employment land for housing could result	- Use of PDL employment land for housing could result	
<b>ER3. To help meet the housing requirements for the whole community</b>			
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>			
<b>ER5. To revitalise town centres</b>	+ May use PDL in town centre, improving its vitality	+ May use PDL in town centre, improving its vitality	
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ PDL is likely to be closer to existing services than new greenfield sites, reducing trip generation	+ PDL is likely to be closer to existing services than new greenfield sites, reducing trip generation	
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>			
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>			
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	0/+ Development of vacant or derelict land reduces security and potential of crime and anti-social activity.	0/+ Development of vacant or derelict land reduces security and potential of crime and anti-social activity.	

Note: There is now no difference between the policy and 'do nothing' alternative as the policy reflects the 60% standard set out in PPS3 June 2011 and the East of England Plan 2008.

<b>Core Strategy Policy CS12: Affordable Housing</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality				
ET2. To conserve soil resources and quality	+ Encourages use of PDL by allowing flexibility on affordable provision depending on viability	- Encourages use of greenfield land by not promoting use of PDL		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels				
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance				
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes				
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs				
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation	+ Seeks to provide balanced communities			

<b>ER1. To reduce poverty and social exclusion</b>	++ Provides affordable housing and rented accommodation	- May provide lower levels of affordable housing		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>				
<b>ER3. To help meet the housing requirements for the whole community</b>	++ Provides affordable housing and rented accommodation	- May provide lower levels of affordable housing		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>				
<b>ER5. To revitalise town centres</b>				
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>				
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

<b>Core Strategy Policy CS20: Key Transport Proposals</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Seeks to relieve air quality issues	- Air quality issues will not improve as traffic increases		
<b>ET2. To conserve soil resources and quality</b>				
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ Seeks to reduce private car dependency by 15% and encourages rail	- Air quality issues will not improve as traffic increases. Waterfront safety issues		
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Transport provision and planning should improve access to town centre for Waterfront residents	- Access could suffer. Traffic and Pedestrian safety issues on Waterfront		
<b>ET6. To reduce contributions to climate change</b>	+ Better bus and pedestrian links may decrease car usage	- No policy could increase car use		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>				
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+Closure of Waterfront Northern Quays route to general traffic will enhance waterfront			
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Taking traffic out of Waterfront will enhance Conservation Area			
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+ Promotes pedestrian links between shops, rail station and Waterfront			- Building can cause air pollution in the short term
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Will improve Waterfront by removing general traffic			-Wet dock crossing construction could cause disturbance in the short term

<b>ER1. To reduce poverty and social exclusion</b>	+ Improved pedestrian links will reduce social exclusion of communities	- Separate communities with limited connectivity on riverside		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	+ Facilitates sustainable transport to major employment areas in the town	- Poor transport links could hinder job access		+ Construction jobs could increase in the short term
<b>ER3. To help meet the housing requirements for the whole community</b>				
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Supports completion of Felixstowe to Nuneaton rail line which will benefit freight movement			
<b>ER5. To revitalise town centres</b>	+ improved bus station and passenger information will bring people into town	- Access to the town centre could be limited		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ Supports improvements to bus and rail			
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Improved travel environment could encourage and facilitate investment	- Poor transport links could hinder investment		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>		- Access to education facilities may not be as strong		
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

<b>Core Strategy Policy DC4: Development and Flood risk</b>	<b>Policy</b>	<b>“Do Nothing” Alternative</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
ET1. To improve water and air quality	++ Water conservation and management, quality drainage systems.	- Flooding could lead to water pollution		
ET2. To conserve soil resources and quality	+/- Open space may be flooded, but this unlikely to affect soil quality in an urban area	- Flooding could lead to soil pollution		
ET3. To reduce waste				
ET4. To reduce the effects of traffic upon the environment				
ET5. To improve access to key services for all sectors of the population				
ET6. To reduce contributions to climate change				
ET7. To reduce vulnerability to climatic events and increasing sea levels	0/+ Does not increase the overall risk of flooding. Supporting text sets out circumstances when basement dwellings will not be permitted.	0/+ Development would be guided by PPS 25		
ET8. To conserve and enhance biodiversity				
ET9. To conserve and where appropriate enhance areas and sites of historical importance		- Flooding could damage sites		
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes		- Flooding could damage townscapes		
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs		- Flooding could damage protected areas		
HW1. To improve the health of those most in need				
HW2. To improve the quality of life where people live and encourage community participation				



ER1. To reduce poverty and social exclusion				
ER2. To offer everybody the opportunity for rewarding and satisfying employment				
ER3. To help meet the housing requirements for the whole community				
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area				
ER5. To revitalise town centres				
ER6. To encourage efficient patterns of movement in support of economic growth				
ER7. To encourage and accommodate both indigenous and inward investment		- Flood risk may put off investment		
CL1. To maintain and improve access to education and skills for both young people and adults				
CD1. To minimise potential opportunities for crime and anti-social activity				

<b>Core Strategy Policy DC6: Tall Buildings</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – No control of location</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ Microclimate addressed			
<b>ET2. To conserve soil resources and quality</b>	0/+ Tall buildings yield more dwellings per hectare	- More land will have to be used		
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	0/+ Relationship to transport infrastructure addressed	- Could generate lots of traffic in what was a quiet area		
<b>ET5. To improve access to key services for all sectors of the population</b>				
<b>ET6. To reduce contributions to climate change</b>	+ Sustainable design sought			
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	+Sustainable design sought which could minimise impacts of runoff.			
<b>ET8. To conserve and enhance biodiversity</b>				
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>	+ Considers impact on Conservation Areas	- Possible impact of buildings on a wide area		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+Considers impact on strategic views, character and appearance of area	- Possible impact of buildings on a wide area		Policy not now focused to a particular area so could result in spread of tall buildings across town.
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+ Considers microclimate (urban heating) beneficial to very young and old in extremely hot weather.			
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+/- Considers contribution to public space and facilities. Tall buildings might be allowed			

	anywhere in Ipswich.			
<b>ER1. To reduce poverty and social exclusion</b>				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>				
<b>ER3. To help meet the housing requirements for the whole community</b>	++ Provides housing			
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>				
<b>ER5. To revitalise town centres</b>	0/+ Could help to revitalise town centres			
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>				
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>				
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>				
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>				

<b>Core Strategy Policy DC31: Housing density</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – Allows more flexibility as not set out in PPS3</b>	<b>Secondary effects</b>	<b>Short, medium and long-term effects</b>
<b>ET1. To improve water and air quality</b>	+ High densities around service centres may reduce trip generation	- Allows more flexibility as PPS 3 does not set out density standards may result in lower densities		
<b>ET2. To conserve soil resources and quality</b>	+ Would ensure less greenfield land is required for development	- As PPS 3 does not set out density standards may result in lower densities		
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>	+ High densities around service centres may reduce trip generation			
<b>ET5. To improve access to key services for all sectors of the population</b>	? No consideration of impact of high densities on service needs			
<b>ET6. To reduce contributions to climate change</b>	+ High density of housing may reduce CO <sub>2</sub> emissions, especially if CHP schemes are used	- As PPS 3 does not set out density standards may result in lower densities and higher Co2 emissions if less viable for renewable schemes.		
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>				
<b>ET8. To conserve and enhance biodiversity</b>	+Suggestion of exceptions to density requirements where required.	- Biodiversity could suffer		
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>				
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Densities may be varied according to character of site			
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>				
<b>HW1. To improve the health of those most in need</b>	+ High densities around service centres may encourage walking/cycling			
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	- Focus is on achieving densities not creating communities			

<b>ER1. To reduce poverty and social exclusion</b>				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>				
<b>ER3. To help meet the housing requirements for the whole community</b>	++ High density of housing means more can be built but flexibility to meet all types of need.	-- As PPS 3 does not set out density standards may result in lower densities		
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	- Focuses on housing and not likely to provide of range of employment			
<b>ER5. To revitalise town centres</b>	+ High densities in town centre may improves its vitality	- As PPS 3 does not set out density standards may result in lower densities		
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ High densities around service centres may reduce trip generation	- As PPS 3 does not set out density standards may result in lower densities		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ May mean more land is available for employment use			
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	- No consideration of impact on school provision of high density			
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	- No consideration of crime and anti social issues in high density areas			

<b>Core Strategy Policy DC28: Non residential uses in residential areas</b>	<b>Policy</b>	<b>“Do Nothing” Alternative – Allow non residential</b>	<b>Secondary effects</b>
<b>ET1. To improve water and air quality</b>	0/+ States effects on traffic must be minimal	- Traffic generation from employment use could impact upon quality of residential area	
<b>ET2. To conserve soil resources and quality</b>			
<b>ET3. To reduce waste</b>			
<b>ET4. To reduce the effects of traffic upon the environment</b>	0/+ States effects on traffic not be harmful	- Traffic generation could increase	
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Could locate services close to housing	+ Could locate services close to housing	
<b>ET6. To reduce contributions to climate change</b>	0/+ States effects on traffic must not be harmful	- Increased traffic generation	
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>			
<b>ET8. To conserve and enhance biodiversity</b>			
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>			
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	+ Any proposed use must be compatible with surroundings		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>			
<b>HW1. To improve the health of those most in need</b>			
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ Placing community facilities could act as a catalyst for econ dev	- Too much employment in residential areas could reduce quality of life	

<b>ER1. To reduce poverty and social exclusion</b>			
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>	++ Could place employment near housing	+ Could place employment near housing	
<b>ER3. To help meet the housing requirements for the whole community</b>	+ Safeguards housing stock	- Housing may be moved to employment use	
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	+ Facilitates economic growth		
<b>ER5. To revitalise town centres</b>			
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>	+ States effects on traffic must not be harmful		
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	+ Facilities investment		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>			
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>			

<b>Core Strategy Policy DC30: Provision of new open spaces and sport / recreation facilities</b>	<b>Policy</b>	<b>“Do Nothing” Alternative - No standard for provision</b>	<b>Secondary effects</b>
ET1. To improve water and air quality			
ET2. To conserve soil resources and quality	0/+ Open space may be provided and some less likely to be developed but viability criteria may mean this is minimal	- Open space more likely to be developed	
ET3. To reduce waste			
ET4. To reduce the effects of traffic upon the environment			
ET5. To improve access to key services for all sectors of the population	+ Access to open and play space should be maintained or improved	- Access to open and play space could decrease	
ET6. To reduce contributions to climate change			
ET7. To reduce vulnerability to climatic events and increasing sea levels	+ More green space will provide soakaway for runoff	- increased runoff from greater impermeable area	
ET8. To conserve and enhance biodiversity	0/+ Could be biodiversity gain but viability criteria means this could be reduced		
ET9. To conserve and where appropriate enhance areas and sites of historical importance			
ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+ Provision of open space could enhance distinctiveness	- Open space more likely to be developed	
ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs			
HW1. To improve the health of those most in need	+ Access to sport facilities should increase health	-- Less sport and recreation space available	
HW2. To improve the quality of life where people live and encourage community participation	+ More open space should improve quality of life however less provided if makes development unviable.	- Less open space and recreation space	



<b>ER1. To reduce poverty and social exclusion</b>	-- Lower standards might be accepted to make development viable		
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>			
<b>ER3. To help meet the housing requirements for the whole community</b>	0/- Less scope for meeting housing needs	0/+ Housing land more readily available.	Requirement for open space could lead to higher density housing
<b>ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area</b>	0/+ Encourages development through preparedness to compromise on open space		
<b>ER5. To revitalise town centres</b>			
<b>ER6. To encourage efficient patterns of movement in support of economic growth</b>			
<b>ER7. To encourage and accommodate both indigenous and inward investment</b>	0/+ Could encourage investment in Ipswich if prepared to compromise on open space standards		
<b>CL1. To maintain and improve access to education and skills for both young people and adults</b>	+ Children's recreation and play space addressed	- Less recreation space for children could hinder development	
<b>CD1. To minimise potential opportunities for crime and anti-social activity</b>	0/+ More recreation spaces could lead to less crime	0/- Less recreation and sport space could lead to more crime	