

**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:

	<b>Option</b>	<b>Cumulative score</b>
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**

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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.



## 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>	Yes – September 2009 SA Addendum updated to reflect the protection to the character and appearance.
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 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. Proposals must be fully integrated into the proposed development at the design stage.</b></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.
DC11	<p>Revised wording as provided in ECD011 Central Ipswich Skyline <b>“Developments will only be permitted where they do not seriously disrupt this setting, especially when viewed from sensitive locations key view points.</b> Key viewpoints will be identified in the IP-One Area Action Plan.</p>	No – August 2011SA still appropriate
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>	No – August 2009 SA still applies as garden space will still be retained.
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>	No – August 2009 SA still appropriate.

	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
Matter 7 Local Economy		
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
Matter 2 Location of new homes		
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.
Matter 3 Northern Fringe		
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.
Matter 10 Infrastructure		
	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	Revised wording and title change Key Transport Proposals Major alterations to policy CS20 to decrease status of	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. Deleted text concerning Star Lane gyratory and Wet Dock crossing so now reads: <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. 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>	<p>more sustainable due to anticipated impact of Wet Dock crossing on wildlife and conservation area.</p>
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>
<b>ET1. To improve water and air quality</b>	++ Water conservation and management, quality drainage systems.	- Flooding could lead to water pollution		
<b>ET2. To conserve soil resources and quality</b>	+/- Open space may be flooded, but this unlikely to affect soil quality in an urban area	- Flooding could lead to soil pollution		
<b>ET3. To reduce waste</b>				
<b>ET4. To reduce the effects of traffic upon the environment</b>				
<b>ET5. To improve access to key services for all sectors of the population</b>				
<b>ET6. To reduce contributions to climate change</b>				
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	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		
<b>ET8. To conserve and enhance biodiversity</b>				
<b>ET9. To conserve and where appropriate enhance areas and sites of historical importance</b>		- Flooding could damage sites		
<b>ET10. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>		- Flooding could damage townscapes		
<b>ET11. To protect and enhance favourable conditions on SSSIs, SPAs and SACs</b>		- Flooding could damage protected areas		
<b>HW1. To improve the health of those most in need</b>				
<b>HW2. To improve the quality of life where people live and encourage community participation</b>				

<b>ER1. To reduce poverty and social exclusion</b>				
<b>ER2. To offer everybody the opportunity for rewarding and satisfying employment</b>				
<b>ER3. To help meet the housing requirements for the whole community</b>				
<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>		- Flood risk may put off 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 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>
<b>ET1. To improve water and air quality</b>			
<b>ET2. To conserve soil resources and quality</b>	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	
<b>ET3. To reduce waste</b>			
<b>ET4. To reduce the effects of traffic upon the environment</b>			
<b>ET5. To improve access to key services for all sectors of the population</b>	+ Access to open and play space should be maintained or improved	- Access to open and play space could decrease	
<b>ET6. To reduce contributions to climate change</b>			
<b>ET7. To reduce vulnerability to climatic events and increasing sea levels</b>	+ More green space will provide soakaway for runoff	- increased runoff from greater impermeable area	
<b>ET8. To conserve and enhance biodiversity</b>	0/+ Could be biodiversity gain but viability criteria means this could be reduced		
<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>	+ Provision of open space could enhance distinctiveness	- Open space more likely to be developed	
<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>	+ Access to sport facilities should increase health	-- Less sport and recreation space available	
<b>HW2. To improve the quality of life where people live and encourage community participation</b>	+ 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	