

# **Updated Appropriate Assessment**

for

Ipswich Borough Council  
Focussed changes to Core Strategy and  
Policies Development Plan

**November 2010**



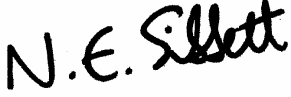

## Quality control

Updated Appropriate Assessment

for

Ipswich Borough Council

Focussed changes to Core Strategy and Policies Development Plan

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## Part 2: Appendices

01 Focussed changes to Core Strategy and Policies Development Plan, October 2010

## **Summary**

This document contains updates of the Appropriate Assessment of Ipswich Borough Council's Core Strategy and Policies Development Plan Document, considering focussed changes approved by Ipswich Borough Council at a Full Council meeting on 27<sup>th</sup> October 2010, as required by the Conservation of Habitats and Species Regulations 2010. These regulations are often abbreviated to, simply, the 'Habitats Regulations'. The Appropriate Assessment specifically looks at the implications of the focussed changes of the Core Strategy and Policies Development Plan Document for nature conservation sites with a European nature conservation designation comprising Special Areas of Conservation and Special Protection Areas, and Ramsar wetland sites of global importance.

A reduction in the amount of housing growth caused a small reduction in impact to European sites. However, the reduction in impact was not great, and mitigation measures given in Policy CS16 'Green Infrastructure, Sport and Recreation' remain required. With this in place, it is possible to ascertain that the Core Strategy and Policies Development Plan Document as amended by Ipswich Borough Council on 27<sup>th</sup> October 2010 will have no adverse affect upon any European site.

***Part 1: text***





# 1 Introduction

## 1.1 The plan being assessed

- 1.1.1 In November 2007, Ipswich Borough Council published its Preferred Options for its Local Development Framework Core Strategy and Policies. The preferred options document set out an approach to providing a strategic vision and objectives to guide the development of Ipswich, it promoted a strategic approach to the development of the town, and provided an indication of the likely coverage of a suite of policies to control, manage and guide development.
- 1.1.2 In July 2009 the Proposed Submission Core Strategy and Policies was published. The July 2009 version of the Core Strategy and Policies was subsequently superseded by the final Proposed Submission Core Strategy and Policies, which was published in September 2009 for consideration by Ipswich Borough Council's Council meeting on 9<sup>th</sup> September 2009. Following revocation of the East of England Plan, focussed changes and minor changes were made to the Core Strategies and Policies Development Plan Document which were approved by Ipswich Borough Council on 27<sup>th</sup> October 2010. These changes are included at Appendix 1.
- 1.1.3 The Suffolk Coastal District Council Core Strategy and Development Management Policies are at a similar stage to the Ipswich Borough Council Core Strategy and Policies. It is considered that this may have effects in combination and consequently both plans were considered together in a joint project, although separate reports were produced for each Local Authority. The respective plan of Babergh District Council was not included in this assessment as it is at an earlier stage, though current planning applications as at 2009 were taken into account.

## 1.2 Versions of this Appropriate Assessment

- 1.2.1 An Appropriate Assessment was published in July 2009<sup>1</sup>, assessing the contemporaneous version of the Proposed Submission Core Strategies and Policies. Subsequently, an Addendum was published in September 2009 to assess changes to the Core Strategies and Policies made at that time.
- 1.2.2 This Appropriate Assessment assesses the focussed changes to the Core Strategies and Policies Development Plan Document which were approved by Ipswich Borough Council on 27<sup>th</sup> October 2010, and thus should be read in conjunction with the previous Appropriate Assessment and Addendum of September 2009. Minor changes are not reassessed as they do not significantly change the Development Plan Document.

## 1.3 Appropriate Assessment requirement

- 1.3.1 The Appropriate Assessment process is required under the Conservation of Habitats and Species Regulations 2010, which supersedes the previously-used Conservation (Natural Habitats &c.) Regulations 1994 as amended by the Conservation (Natural Habitats &c.) (Amendment) Regulations 2007. These regulations are often abbreviated to, simply, the 'Habitats Regulations'.
- 1.3.2 The plan-making authority, as defined under the Regulations, is Ipswich Borough Council. The Appropriate Assessment in this report is carried out on behalf of Ipswich Borough Council to allow them to decide whether to give effect to the plan.
- 1.3.3 This Appropriate Assessment of the focussed changes is an iteration; as the plan changes the Appropriate Assessment responds.

## 1.4 European sites potentially affected

- 1.4.1 The focussed changes do not change the set of European sites potentially affected according to the September 2009 Appropriate Assessment.

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<sup>1</sup> The Landscape Partnership (July 2009) *Appropriate Assessment for Ipswich Borough Council Core Strategy and Policies*, published by Ipswich Borough Council

## **1.5 Other relevant plans or projects affecting these sites**

- 1.5.1 No further relevant plans or projects have been identified in addition to those described in the September 2009 Appropriate Assessment.

## 2 Focussed changes to policies to be assessed

### 2.1 Introduction

2.1.1 The focussed changes of October 2010 were based around the following issues

- Amending references to the Ipswich Policy Area, which RSS identified (Policy CS6 and CS13);
- A reduction of annual dwelling build rates 2001 – 2021 from 770 per year to 700 per year, resulting in a target of 14,000 new dwellings in that period instead of 15,400 and an outstanding 3,951 allocations required from 2010 to 2021 (Policy CS7);
- Amending affordable housing targets and Gypsy and traveller pitch requirements (Policies CS12 and CS11); and
- Amending references to infrastructure and determining the overall scale of development at the Ipswich Northern Fringe (Policy CS10).

2.1.2 Focussed changes to the policies assessed in the September 2009 Appropriate Assessment are discussed below.

### 2.2 Policies with focussed changes requiring an update of the Appropriate Assessment

#### *Policy CS7. The amount of housing required*

2.2.1 The housing provision was updated in the October 2010 Core Strategy and Policies Development Plan Document to reflect updated evidence. The Plan will allocate land for at least 3,951 dwellings between 2010 and 2021 in the Borough, with a requirement of 700 dwellings per year from 2021 to 2026. This is a slightly lower rate of housing growth than previously.

2.2.2 This change requires an updating of the assessment for policy CS7.

#### *Policy CS 10. Ipswich Northern Fringe*

2.2.3 Focussed changes to policy CS10 change the mechanism for determining housing provision in the Ipswich northern fringe and include references to the proposed Country Park given in policy CS16, and so require an updating of the assessment.

### 2.3 Other policies

#### *Policies previously assessed in September 2009*

2.3.1 No focussed changes were made to the policies below. No specific update of the assessment is required in relation to these policies as there is no change to their likelihood of having no significant effect upon European sites.

- Policy CS9. Previously developed land target
- Policy CS16. Green infrastructure, sport and recreation
- Policy CS18. Strategic flood defence
- Policy CS20. East-west transport capacity
- Policy DC4. Development and flood risk
- Policy DC15. Travel demand management
- Policy DC32 Conserving local natural and geological interest

2.3.2 Focussed changes were made to CS13 regarding cross-boundary working with other Local Authorities, and the revocation of the Regional Spatial Strategy. The focussed changes do not

alter the conclusion in September 2009 that the policy is likely to have no significant effect upon any European site.

***Policies with focussed changes not previously assessed in September 2009***

2.3.3 Three further policies have been subject to focussed changes. It is considered that the focussed changes do not alter the findings of the September 2009 assessment, because the changes make no difference to the policies' effect on European sites.

2.3.4 These policies are

- CS6. Cross-boundary Working
- CS11. Gypsy and Traveller Accommodation
- CS12. Affordable Housing

2.3.5 Consequently, no updating of the Appropriate Assessment is required for these policies.

### 3 Methods of assessing European site visitor increases from an increased population

#### 3.1 Introduction

3.1.1 The September 2009 Appropriate Assessment considered the increased population arising from proposed housing in both Ipswich Borough and Suffolk Coastal District. The focussed changes, to a lower amount of housing growth, require an update of the assessment to determine impact on European sites.

#### 3.2 Calculation of additional visitors to European sites across the Suffolk Coast and Heaths AONB.

3.2.1 This section looks at the group of people classified as 'day visitors' in the typology in section 5.1 above.

3.2.2 Tables 3 to 6 below (numbered identically) of the September 2009 Appropriate Assessment have been revised according to the focussed changes reduction in housing growth in Ipswich Borough.

Table 3. The estimated numerical increase in population for new housing.

Town / area	proposed new housing units	Estimated increase in people*
Ipswich Borough	10,261 <sup>2</sup>	14,160
Wider Ipswich area, wholly within Suffolk Coastal District (Rushmere, Kesgrave and Martlesham wards)	2,640 <sup>3</sup>	2,376
Felixstowe, including Trimleys with Kirton	1,410 <sup>4</sup>	1,269
Remainder of Suffolk Coastal District	3,660 <sup>5</sup>	3,294
Shotley	404 <sup>6</sup>	606
<b>Totals</b>	<b>19,630</b>	<b>21,075</b>

\* based on population projections

3.2.3 Table 4 shows the proportionate increase in population for these areas of new housing. It is important to look at the increases of each development in combination, as well as individually, as each impact might be individually too small to give rise to a significant impact, but in combination could have an adverse affect.

<sup>2</sup> Comprises 2058 dwellings with planning permission but not constructed at April 2010, 752 dwellings with a resolution to grant planning permission at April 2008, 3951 new allocations to 2021 and 3500 new allocations 2021 – 2025 (IBC Core Strategy and Policies, Table 2 supporting policy CS7)

<sup>3</sup> SCDC Core strategy – 420 outstanding planning permissions at 2008, 220 dwellings urban potential, 2000 new allocations to 2025

<sup>4</sup> SCDC Core strategy – 160 outstanding planning permissions at 2008, 250 dwellings urban potential, 1000 new allocations

<sup>5</sup> SCDC Core strategy – Market towns; 670 outstanding planning permissions at 2008, 150 existing Local Plan allocations, 400 dwellings urban potential, 870 new allocations, and Key/local service centres 530 outstanding planning permissions at 2008, 120 existing Local Plan allocations, 170 dwellings urban potential, 210 new allocations. 540 windfall sites (could be anywhere in the District).

<sup>6</sup> 404 dwelling retirement community planned – see <http://www.babergh.gov.uk/Babergh/Home/Planning+and+Building+Control/Planning+Information/HMS+Ganges+-+Revision/>. Assumption 1.5 people per dwelling.

Table 4. The proportionate increase in population for areas of new housing.

Town / area	Existing population size	Estimated increase in people (table 3)	estimated % increase in people (estimated increase / existing)
Ipswich Borough, plus adjoining Pinewood ward (Babergh district)	132,013 <sup>7</sup>	14,160	10.7%
Wider Ipswich area, wholly within Suffolk Coastal District (Rushmere, Kesgrave and Martlesham wards)	20,014 <sup>8</sup>	2,376	11.9%
Felixstowe, including Trimleys with Kirton	33,735 <sup>9</sup>	1,269	3.7%
Remainder of Suffolk Coastal District	68,251 <sup>10</sup>	3,294	4.8%
Shotley	2483 <sup>11</sup>	606	24.4%
<b>Totals</b>	<b>256,496</b>	<b>21,705</b>	<b>8.46%</b>

- 3.2.4 The data in Tables 3 and 4 above can be used to calculate the extra number of people visiting European sites within the Suffolk Coast and Heaths AONB, subject to the assumptions in the September 2009 Appropriate Assessment.
- 3.2.5 The increase of total visitors to European sites in the AONB is calculated as a percentage change, rather than a numeric increase, because the total number of visitors is not known. The percentage increase in total visitors to European sites takes into account the ratio of day visitors to overnight visitors (i.e. holiday makers), the proportion of visitors from each point of origin, and the increase of people in each point of origin. This can be expressed by the calculation (%day visitors) x (%from point of origin) x (%increase at point of origin).
- 3.2.6 Table 5 below calculates the increase in total visitors to the AONB based on the calculation above, for each point of origin and for the total. For clarity of calculation, percentages are given as a proportion of 1 e.g. 55% is shown as 0.55. To reduce rounding errors, the total for column D is calculated from the totals for columns B and C.

<sup>7</sup> <http://neighbourhood.statistics.gov.uk> – 2001 census data for Pinewood (4013 people) plus 128,000 people for Ipswich in 2007 (IBC core Strategy)

<sup>8</sup> <http://neighbourhood.statistics.gov.uk> – 2001 census data

<sup>9</sup> <http://neighbourhood.statistics.gov.uk> – 2001 census data

<sup>10</sup> Whole district population 2006 is 122,000 (Core strategy preferred options p11) Deduct figures for Wider Ipswich area and Felixstowe.

<sup>11</sup> <http://neighbourhood.statistics.gov.uk> – 2001 census data

Table 5. Predicted increase in total visitors to Suffolk Coast and Heath AONB.

<b>Origin of day visitors to AONB</b>	<b>(A) proportion of total AONB day visitors (estimate) from table 2 expressed as a fraction of 1</b>	<b>(B) proportion of total AONB visitors (A x 0.55)<sup>12</sup></b>	<b>(C) % increase in people at place of origin from table 4 expressed as a fraction of 1</b>	<b>(D) The proportionate increase in total visitors to the AONB (B) x (C)</b>
Ipswich Borough, plus adjoining Pinewood ward (Babergh district)	0.116	0.064	0.107	<b>0.0068</b>
Wider Ipswich area, wholly within Suffolk Coastal District (Rushmere, Kesgrave and Martlesham wards)	0.067	0.037	0.119	<b>0.0044</b>
Felixstowe, including Trimleys with Kirton	0.04	0.022	0.037	<b>0.0008</b>
Remainder of Suffolk Coastal District	0.265	0.146	0.048	<b>0.0070</b>
Shotley	0.002	0.001	0.244	<b>0.0002</b>
<b>Totals</b>	<b>0.49</b>	<b>0.270</b>	<b>0.0846</b>	<b>0.0228</b>

## 3.2.7

To help interpret Table 5 above, Table 6 below shows the Table 5 column D data alone, expressed as a percentage increase in total visitors.

Table 6. The predicted percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal

<b>Place of origin</b>	<b>The predicted increase in visitors to the AONB from each place of origin</b>
Ipswich Borough, plus adjoining Pinewood ward (Babergh district)	0.68%
Wider Ipswich area, wholly within Suffolk Coastal District (Rushmere, Kesgrave and Martlesham wards)	0.44%
Felixstowe, including Trimleys with Kirton	0.08%
Remainder of Suffolk Coastal District	0.7%
Shotley	0.02%
<b>Totals</b>	<b>2.28%</b>

<sup>12</sup> only 55% of AONB visitors are day visitors; an increase in housing does not change the amount of holiday makers

- 3.2.8 Table 6 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 2.28%. The calculations for the change in visitors to European sites across the Suffolk Coast and Heaths AONB are summarised below.

*Summary of visitor change calculations*

*About half (55%) of visitors to the Suffolk Coast and Heaths AONB were local people on a day trip, with the remainder being holiday makers staying in tourist accommodation. Of the locals on a day trip, about half of those (49%) were from Ipswich Borough and Suffolk Coastal District, with the remainder from elsewhere, for example, from Norwich or Bury St Edmunds. Combining these figures, half the visitors being on day trips, and half of those being from Ipswich Borough and Suffolk Coastal District, the calculation is that roughly one-quarter of all visits to the AONB are from Ipswich Borough and Suffolk Coastal District. This is the assumption applied to the European sites also.*

*With roughly one-quarter (27%) of the day trips coming from residents in Ipswich Borough and Suffolk Coastal, those day trips are expected to rise in proportion with the predicted 8.46% population increase i.e. the number of day trips from Ipswich Borough and Suffolk Coastal are expected to rise by 8.46%. However, other sources of visitors (holidaymakers or day trips from elsewhere) will not rise accordingly. An expected 8.46% increase in the combined population of Ipswich Borough and Suffolk Coastal applied to the existing Ipswich Borough and Suffolk Coastal day trip visitors, (27% x 8.46%) gives an expected increase equivalent to 2.28% of total visits.*

- 3.2.9 There are limitations to this approach, described in the September 2009 Appropriate Assessment. The result is that the 2.28% figure is not considered to be precise, but an estimate. **It would be reasonable to retain the assumption that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB remains in the range of 2% - 5%** as a result of the focussed changes to Ipswich Borough Council and Suffolk Coastal District Council Core Strategy proposals.

### **3.3 Impact on European sites used for local recreation**

- 3.3.1 The focussed changes are not considered to change the conclusions of the September 2009 Appropriate Assessment for the **use by people of European sites close to their homes for recreation or other activities.**



## 4 Assessment of changed policies

### 4.1 Introduction to the assessment of changed policies

- 4.1.1 In this Section, the previous assessments of Policy CS7 and Policy CS10 are updated, including consideration of the related but unchanged policy CS9.
- 4.1.2 The potential housing impacts are updated in the absence of mitigation in this Section. Impacts on European sites in the wider area are assessed for the broad allocations in Ipswich alone, and again for the Ipswich Borough allocations in combination with allocations in Suffolk Coastal District.

### 4.2 Policy CS7, The amount of housing required, Policy CS9, Previously developed land target, and Policy CS10 Ipswich Northern Fringe.

- 4.2.1 All three policies together set the amount and location of housing growth, and are considered together within this update.

#### ***Impact on European sites in the wider area – day visitors resulting from Ipswich Core Strategy existing permissions and allocations only***

- 4.2.2 The change from a 0.8% increase in visitors to a 0.68% increase in visitors to European sites as a result of the focussed changes is a minor reduction in impact, and the conclusion in the September 2009 Appropriate Assessment of no adverse effect upon the integrity of European sites is unchanged.

#### ***Impact on European sites in the wider area – day visitors resulting from Ipswich and Suffolk Coastal Core Strategy existing permissions and allocations combined***

- 4.2.3 The estimate of a general increase in visitors to the European sites within Suffolk Coast and Heaths AONB is unchanged at around 2 – 5 %, as a result of existing permissions and new housing growth, in the Ipswich Borough Core Strategy and Policies Development Plan Document in combination with the Suffolk Coastal District Core Strategy and Development Management Policies.

- 4.2.4 The conclusion in the September 2009 Appropriate Assessment of being unable to ascertain no adverse effect upon the integrity of European sites is unchanged.

#### ***Impact on nearby European sites used for local recreation from the Ipswich Core Strategy and Policy existing permissions and allocations alone***

- 4.2.5 The change from a 13% increase in visitors to a 10.7% increase in visitors to European sites as a result of the focussed changes is a minor reduction in impact, and the conclusion in the September 2009 Appropriate Assessment of being unable to ascertain no adverse effect upon the integrity of European sites is unchanged.

- 4.2.6 The Orwell Estuary SSSI adjacent to Bridge Wood and Pond Ooze was recorded by Natural England in 2009 as 'favourable', although the results of the Ravenswood et al (2007) study demonstrating relatively high levels of disturbance were available at the time of making the assessment. This is a clear indication that human disturbance was not considered by Natural England to cause unacceptable impacts on the estuary at that time.

## 5 Updated mitigation measures

### 5.1 Introduction to mitigation

- 5.1.1 This section updates the mitigation requirement for the focussed changes to the amount of housing growth.

### 5.2 Mitigation for Policy CS 7, The amount of housing required, CS9, Previously developed land target and CS10 Ipswich northern fringe

#### *Mitigation for visitor impacts upon Stour and Orwell Estuaries SPA – Bridge Wood*

- 5.2.1 Policy CS 16 contains a strong commitment for the Council to adjust its management of Orwell Country Park, giving good confidence that it would be carried out. The policy also includes support to the Greenways Project in its management of green infrastructure, which includes the Gipping path. The mitigation proposed in the September 2009 Appropriate Assessment is therefore contained within this policy and unchanged.

#### *Mitigation for impact on European sites across the AONB*

- 5.2.2 Policy CS16 of the Core Strategy and Policies Development Plan Document commits Ipswich Borough Council to the implementation of a Country Park as required for mitigation as described in the September 2009 Appropriate Assessment. Policy CS16 also contains a commitment for the Council to work with partners on the implementation of visitor management plans for European sites, giving good confidence that it would be carried out. The mitigation proposed in the September 2009 Appropriate Assessment is therefore contained within this policy and unchanged.
- 5.2.3 A focussed change to Policy CS10 has strengthened the reference to providing a Country Park at the Ipswich northern fringe, thus further strengthening the confidence that this feature will be created as a measure to divert a proportion of recreational activity away from European sites.
- 5.2.4 It is noted that the Suffolk Coast and Heaths Unit published a Voluntary Code of Conduct for users of mudflats in the Stour and Orwell Estuaries<sup>13</sup> to invite people to reduce their personal impact upon the site.

### 5.3 Mitigation conclusions

- 5.3.1 Policy CS16 sets out the Council's firm commitment, at a strategic level, for appropriate greenspace management and provision, including visitor management on European sites, the visitor management plan for Bridge Wood and other parts of Orwell Country Park, and a new Country Park north-east of Ipswich. The new Country Park is also given in Policy CS10. Policy CS16 does not go into operational detail about how the mitigation will be implemented, but gives confidence that it will be implemented.
- 5.3.2 It is considered that the mitigation in Section 7.2 will be implemented through Policy CS16 to suitable standards. The impacts of additional housing provisions in Policies CS7/CS9/CS10, alone or in combination with provision in the Suffolk Coastal District Core Strategy and Development Management Policies, will be reduced to an insignificant level. It is ascertained that, with the proposed mitigation, the focussed changes to the Core Strategy and Policies Development Plan Document will have no adverse effect upon the integrity of any European site.

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<sup>13</sup> <http://www.suffolkcoastandheaths.org/uploads/Code%20of%20conduct%20Stour%20and%20Orwell.pdf> accessed on 29<sup>th</sup> October 2010

## **6 Conclusions of the updated Appropriate Assessment**

### **6.1 Policies subject to focussed changes**

- 6.1.1 It is ascertained that the focussed changes to the Core Strategy and Policies Development Plan Document, with the proposed mitigation, will have no adverse affect upon the integrity of any European site.

### **6.2 All other policies**

- 6.2.1 All other policies in the Ipswich Borough Council Core Strategy and Policies Development Plan Document remain not likely to have a significant effect on any European site.

### **6.3 Interactions between policies in this plan**

- 6.3.1 Policies have generally been assessed individually. It is possible that policies may interact, and a combination of policies may have a greater effect than separately. Interactions between policies have been fully considered and no further assessment or changes to conclusions are required.

### **6.4 In combination with plans from others**

- 6.4.1 It is considered that one plan may have an effect in combination, which is the Suffolk Coastal District Core Strategy and Development Management Policies. All the above conclusions take into account any in combination effects. No other plans are considered to have an effect in combination.

### **6.5 Final conclusion**

- 6.5.1 It is ascertained that the Core Strategy and Policies Development Plan Document will not have an adverse affect upon the integrity of any European site, alone and in combination with the Suffolk Coastal District Core Strategy and Development Management Strategy. There is a firm commitment to the mitigation proposed that will reduce the impact of housing growth to an insignificant level and enable this conclusion.





## ***Part 2: Appendices***



# ***Appendix 1***



# Ipswich Borough Council Core Strategy and Policies Development Plan Document

## Schedule of Post Submission Proposed Focused Changes, October 2010, as supplied by Ipswich Borough Council

### 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). A copy of the Core Strategy and Policies DPD showing the tracked changes (proposed focused changes and minor amendments) is available to view on the web site and at the venues specified in the formal notice.

Policy/ paragraph	Change	Reason
<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).
<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'  In bullet 3 amend end of sentence to read: <b>(b) 18,000 additional jobs shall be provided in <u>the wider Ipswich area</u> <del>Policy Area</del> between 2001 and 2025.</b>	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).
Bullet 12	Amend bullet 12 to read ' <b>To work with other local authorities in the <u>wider Ipswich area</u> <del>Policy Area</del> and with LSP partners to ensure a co-ordinated approach to planning and development.</b> '	

Policy/ paragraph	Change	Reason
<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.
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.
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>	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.
8.67 (CS6)	Delete whole paragraph.	
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> '	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.
Policy CS6	Delete heading ' <b><u>POLICY CS6: THE IPSWICH POLICY AREA</u></b> ' and replace with ' <b><u>POLICY CS6: CROSS BOUNDARY WORKING</u></b> '	
Policy CS6 a.	Amend point a) to read: ' <b><u>Formal working through the Ipswich Policy Area Board or other relevant forums</u></b> '	
8.69 (CS6)	Change 'Ipswich Policy Area' to ' <b><u>cross boundary</u></b> ' in first sentence.	
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> '	

Policy/ paragraph	Change	Reason
<b>Policy CS7 The Amount of Housing Required</b>		
8.75 (CS7)	<p>Change 'gives' to '<b><u>gave</u></b>' in first sentence.</p> <p>Add the following text at the end of paragraph: '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.'</p>	<p>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).</p>
8.76 (CS7)	<p>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>'.</p>	
Table 2 (CS7)	<p>Amend figures and table notes to reflect April 2010 baseline and 700 dwelling per annum housing target.</p>	
8.77 (CS7)	<p>Delete whole paragraph.</p>	
8.79 (CS7)	<p>Change year '2025' to '<b><u>2026</u></b>'. Delete last sentence of paragraph:</p> <p>'The Regional Spatial Strategy advises that for the years beyond 2021, we should assume an annual development requirement of 830 dwellings per year.'</p>	
8.80 (CS7)	<p>Change year '2025' to '<b><u>2026</u></b>'.</p>	
PolicyCS7	<p>Change '5,283' to '<b><u>3,951</u></b>' dwellings.</p>	
8.81 (CS7)	<p>Change year '2009' to '<b><u>2010</u></b>'.</p> <p>Change 'under 9,200' to '<b><u>under 6,800</u></b>' units.</p> <p>Delete 'Regional Spatial Strategy'.</p>	
8.82 (CS7)	<p>Change year '2009' to '<b><u>2010</u></b>'.</p> <p>Change '5,283' to '<b><u>3,951</u></b>' dwellings.</p>	
8.83 (CS7)	<p>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></p>	
Tables 3 & 4	<p>Revise Figures to reflect new housing target.</p>	

Policy/ paragraph	Change	Reason
<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.
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).
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.
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.
8.106 (CS10)	Delete paragraph 8.106	
8.107 (CS10)	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>  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>  Delete final line 'for the Policy Area and the Borough area.'	

Policy/ paragraph	Change	Reason
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>... to ensure optimum sustainable distribution of housing within the <u>wider Ipswich area</u>, bearing in mind the amenity value...</b>'</p>	As above.
8.111 (CS10)	Delete the end of the final sentence ' <b>next version of the Regional Spatial Strategy, which will provide a housing target for Ipswich up to around 2031</b> ' and replace with ' <b><u>the next review of the Core Strategy.</u></b> '	
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>	
8.114 (CS10)	<p>Amend first sentence to read '<b>The total number of dwellings likely to be accommodated at the Northern Fringe <u>could be as much as 4,500 in the longer term, but this will be determined through a review of the Core Strategy</u></b>'</p> <p>Add new second sentence:- '<b><u>This will provide plenty of opportunity for interested parties – be they developers, landowners, local residents or others – to get involved and have their say prior to the extent of Northern Fringe development being determined.</u></b>'</p> <p>Amend third sentence to read '<b>However, to ensure that any development proposed for this area prior to 2021 conforms to a coherent plan, work on the supplementary planning document will commence as soon as the Core Strategy has been adopted.</b>'</p> <p>Delete the final sentence 'The supplementary planning document would not be completed until after the next Regional Spatial Strategy is adopted'.</p>	At 8.114, to set out a clear mechanism for the future determination of Northern Fringe development.

Policy/ paragraph	Change	Reason
<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>	<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).</p>
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>	As above
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.
8.118 (CS11)	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> '	The grant scheme referred to has been cancelled (however funding assistance is still available from the Homes and communities Agency).
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>The local Gypsy and Traveller Accommodation Assessment identified a need ...</b> '	
8.122 (CS11)	Delete 'fifteen pitches identified by the Regional Spatial Strategy Single Issue Review' and replace with ' <b><u>additional pitches</u></b> '	

Policy/ paragraph	Change	Reason
<b>CS12 Affordable Housing</b>		
Policy CS12 a.          8.126 (CS12)	Change '40%' to <b><u>'35%'</u></b>          Delete the entire existing paragraph.	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.          The topic paper Reviewing the Ipswich Housing Figures also provides more background (see Link 2 below).
<b>Policy CS13 Planning for Jobs Growth</b>		
Policy CS13          8.140 (CS13)    8.141 (CS13)          8.144 (CS13)	Amend the first sentence to read: <b><u>'The Council will promote sustainable economic growth in the wider Ipswich area.'</u></b>          Delete most of existing paragraph and replace with: <b><u>'Ipswich is a key economic driver of the County and the Haven Gateway area. The Haven Gateway Employment Land Study 2005 forecast growth of 17,800 jobs in Ipswich between 2001 and 2021 (see Table 5).'</u></b>   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>   Delete 'in the Regional Spatial Strategy'	To respond to the revocation of the East of England Plan, which identified the Ipswich Policy Area.          The Council remains committed to cross boundary working to deliver jobs growth, and the joint Employment Land Review for the Suffolk Haven Gateway authorities (2009) recommends this approach (see Link 5 below). Therefore the policy has been amended to refer to the 'wider Ipswich area'. The jobs target has not changed.          For clarity following the deletion of much of paragraph 8.140.          Reference to joint working forums has been added to reflect policy CS6.

Policy/ paragraph	Change	Reason
8.145 (CS13) 8.147 (CS13)	Delete entire paragraph  In the penultimate sentence delete 'Regional Spatial Strategy' and replace with ' <b><u>Employment Land Review</u></b> '	
<b>Part C Development Control Policies</b>		
DC31	In clause c. delete 'achieving a density of at least 30dph'  Change 'take' to ' <b><u>taken</u></b> '	To respond to revisions to PPS3 Housing and the shift in current applications away from flats and towards houses. This change will only affect the more peripheral parts of the borough away from the town and district centres. There remains a general requirement for the efficient use of land in PPS3, and therefore we would not expect to see a significant reduction in densities being achieved. Hence the average of 35 d.p.h. for capacity calculations is retained.
<b>Part D Implementation, Targets, Monitoring and Review</b>		
Chapter 10 10.4  Bullet 3   Bullet 4	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 boundary working on strategic issues.</u></b> '  In bullet point 'Regional Cities East' add ' <b><u>previously</u></b> ' before 'with support'	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 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.