



Strategic Environmental Assessment and Sustainability Appraisal

Submission Core Strategy and Policies Development
Plan Document Review

Non-Technical Summary including Post Submission Modifications

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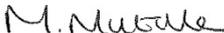
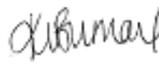


Ipswich Borough Council

Strategic Environmental Assessment and Sustainability Appraisal

Submission Core Strategy and Policies Development Management Document Review

Non-Technical Summary including Post Submission Modifications

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CONTENTS

ABBREVIATIONS.....	6
OCTOBER 2016 POST SUBMISSION MAIN MODIFICATIONS – SA REPORT ADDENDUM.....	7
1 INTRODUCTION AND BACKGROUND	7
2 WHAT IS SUSTAINABILITY APPRAISAL?.....	8
3 SCOPE OF THE APPRAISAL	9
3.1 Policy Context.....	9
3.2 Existing Characteristics and Issues in Ipswich.....	9
3.3 The SA Framework	11
3.4 Which aspects of the Core Strategy were appraised?	11
4 APPRAISAL OF THE CORE STRATEGY AND ALTERNATIVES	11
4.1 The Vision	11
4.2 Strategic Objectives	12
4.3 Core Strategy Policies.....	12
4.4 Development Management Policies	17
5 CUMULATIVE IMPACTS	22
6 MONITORING.....	23

ABBREVIATIONS

Abbreviation	Explanation
AAP	Area Action Plan
DPD	Development Plan Document
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document

OCTOBER 2016 POST SUBMISSION MAIN MODIFICATIONS – SA REPORT ADDENDUM

The December 2015 SA NTS was reviewed for significant changes to make it consistent with the remainder of the October 2016 Post Submission Main Modifications – SA Report Addendum. No significant changes were found necessary and the December 2015 NTS still applies as follows.

1 INTRODUCTION AND BACKGROUND

Ipswich Borough Council adopted their Core Strategy and Policies Development Plan Document (DPD) in 2011 (referred to hereinafter as the Core Strategy). The plan outlines how the borough will accommodate development to meet local needs and ensures this is done in a sustainable way to 2027. A draft focussed review of the Core Strategy was consulted on between January and March 2014 which updated the strategy and provided latest figures for housing and jobs amongst other updates. It was however subsequently decided that the extent of changes in this review amounted to a whole plan review.

The Proposed Submission version of the Core Strategy review was consulted upon between December 2014 and March 2015. Following this consultation, a series of proposed modifications to the DPD were identified and consultation took place on these Pre-Submission Main Modifications in autumn 2015. These two documents together form the plan as submitted under regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The emerging Core Strategy review and emerging Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD (referred to hereinafter as Site Allocations plan) together will provide the new Local Plan for Ipswich up to 2031 – superseding the existing adopted Core Strategy and the remaining saved policies of the 1997 Local Plan.

As part of the preparation process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) has been undertaken. Hereafter the term SA has been used in this report when referring to the combined SA / SEA process. Independent consultants Arcadis UK Limited have undertaken the SA during the development of the Core Strategy. This report provides the **Non-technical Summary**. The full reports can be viewed at the Council's offices at Grafton House, Russell Road, IP1 2DE, at the county library on Northgate Street or on the Council's website (www.ipswich.gov.uk).

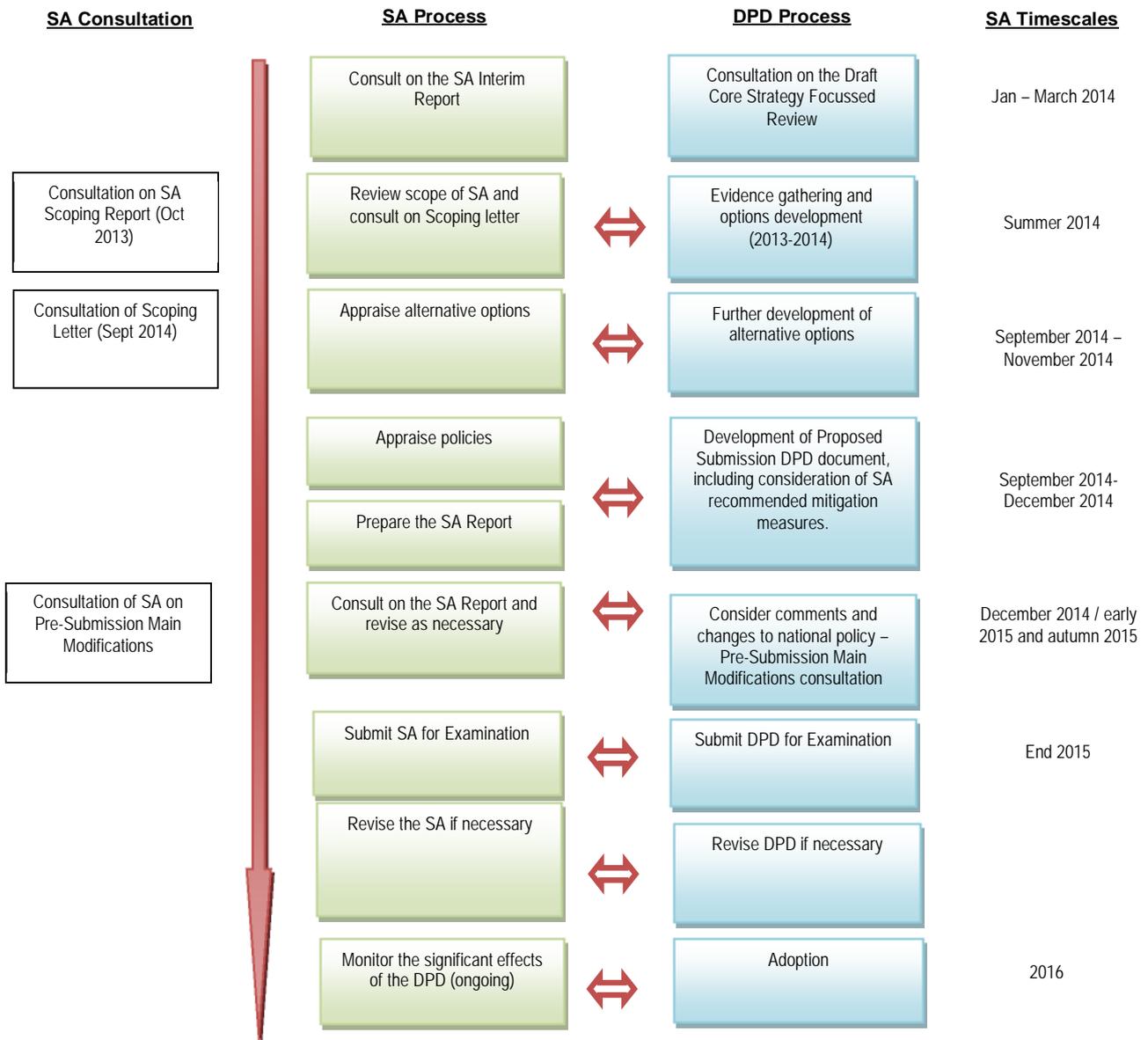
The requirements for consultation outlined under Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004 and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 were met through the December 2014 to March 2015 and October to November 2015 consultations. The assessment and the Submission Core Strategy have not been amended since then.

2 WHAT IS SUSTAINABILITY APPRAISAL?

SA is a process for assessing the social, economic and environmental impacts of a plan as it develops and it aims to ensure that sustainable development is at the heart of the plan-making process. It is a legal requirement under planning law. The law states that the SA must comply with requirements of the European SEA Directive.

Good practice guidance proposes a number of prescribed stages in the SA process, each of which links with stages of the plan-making process. It is important that the SA is able to feed into the plan-making process. This involves the ongoing appraisal of the plan and making recommendations to help steer its direction to avoid potentially adverse consequences. This is particularly important when considering alternative strategy options. Consultation with statutory bodies (Natural England, English Heritage and Environment Agency) and the public is also required at key stages.

A high-level chart showing the SA stages undertaken alongside the plan-making stages is presented below. It also indicates the timeline and key consultation points.



3 SCOPE OF THE APPRAISAL

The scope of the SA was determined through collecting information on the environmental, social and economic characteristics of Ipswich and neighbouring authorities. This enabled key issues, opportunities and trends to be identified. A review of other relevant environmental protection objectives and policies was also undertaken. The scope of the appraisal was documented in an SA Scoping Report in 2013 for the focussed review of the Core Strategy. Following the decision to undertake a whole plan review a SA Scoping Letter was issued for consultation with the statutory bodies in September 2014 to update them of this change. Scoping provided the following information:

- A review of other international, national, regional and local plans and programmes that could influence the development of the SA and the Core Strategy. The review of these documents focussed upon identifying key environmental and sustainability objectives that would need to be considered.
- The identification of key sustainability issues and opportunities in the Borough. This was based upon an understanding of the existing social, economic and environmental conditions in the Borough.
- The framework that would be used to assess the sustainability performance of the Core Strategy.

3.1 Policy Context

A review of other international, national, regional and local plans and environmental protection objectives that could influence the development of the SA and the emerging Core Strategy was undertaken and is recorded in the SA Report. The review of these documents focussed upon identifying key environmental and sustainability objectives that would need to be considered in the SA and the Core Strategy. Over 100 documents were reviewed including the World Summit on Sustainable Development, Johannesburg (2002), relevant European Directives, the UK Sustainable Development Strategy and the National Planning Policy Framework. This has been updated throughout the process where appropriate.

3.2 Existing Characteristics and Issues in Ipswich

To ensure that a robust assessment of the emerging Core Strategy is undertaken, it is necessary to understand the existing conditions and characteristics of Ipswich, for example, the location of key environmental features like Special Protection Areas (SPAs), Conservation Areas, population dynamics including migration patterns, health, employment and the condition of housing stock and its affordability. These are detailed in the SA Report. Table 3-1 below identifies the sustainability topics covered in the SA and summarises some of the key characteristics and issues under each.

Table 3-1 Summary of key sustainability issues and opportunities

SA Topic	Key sustainability issues and opportunities
Population	Ipswich has a high projected population growth and in order to meet the needs of its population it is considered that a large number of new homes are necessary. Potential challenges to this include providing accessible homes for the elderly, providing affordable homes and the provision of smaller one or two bedroom homes. A large percentage of the borough’s populations is under the age of 34 which creates implications for service provisions, education and housing. Improvements can be made to these from opportunities within strategies. The younger age profile of the borough and small boom in children under 5 suggests parenting skills, housing support, baby-and child-friendly facilities, play areas, and school-readiness are growing areas of need.

SA Topic	Key sustainability issues and opportunities
Education	Educational attainment across Ipswich is below the national average, however, the percentage of those holding recognised qualifications are similar to regional and national averages. There exists a need to improve educational attainment across the board which could in turn lead to wider social benefits and improvements to the local economy.
Health	Health deprivation and disability levels in many wards are within 20% of the most deprived. Across the borough life expectancy from birth for males is slightly lower, and life expectancy from birth for females is slightly higher, than national averages. Levels of teenage pregnancy are higher than regional and national levels, which has implications for health service provision. There exists a need to reduce the incidence of diseases and health inequalities and improve health by promoting walking and cycling.
Water	<p>As the East of England is the driest part of the country the area experiences a limited availability of water supply. This leads to high demands and mean much of the water resource is under a great pressure. A key sustainability issue is water quality and most of the central and western area of Ipswich is designated as water source protection zones where certain development activities cannot take place. Furthermore any new developments within the Borough are encouraged to minimise water use and implement schemes to re-use rainwater where possible.</p> <p>Flood risk exists due to the low lying nature of the area. To prevent any increase in flood risk, this land should not be included in development plans. Additionally, Sustainable Drainage Systems should be used to better manage surface water levels.</p>
Soil and Land	Ipswich comprises mainly of an urban built up environment however, the Northern Fringe area is located on what is considered to be the best and most versatile agricultural land which is Grade 2. Opportunities should be sought to include allotment space within the Borough where possible. There is some known potentially contaminated land within the Borough and where appropriate measures for remediating this land should be sought. Soil resources should also be protected and development should continue on brownfield sites.
Air Quality	Due to the urban environment in the centre of Ipswich with high levels of traffic there are four designated Air Quality Management Areas due to exceedances in the pollutant levels. These levels of pollutants should be monitored with the increasing demand on the transport network. Opportunities for more environmentally friendly transport should be sought.
Biodiversity	There is a very high quality natural environment within Ipswich, which needs to be preserved and enhanced. This includes numerous sites designated at local, national and international levels for nature conservation importance. Opportunities should develop and enhance areas of public open space and create new habitats.
Cultural Heritage	Ipswich is home to a wealth of local and nationally important heritage assets. These offer tourism potential and should be protected and enhanced.
Landscape/ Townscape	The vast majority of Ipswich's landscape is urban with some areas in the north and south located within ancient rolling farmlands and rolling estate sandlands. The townscape is varied with many conservation areas of archaeological and historic significance. It is therefore important for both, landscape and townscape that the character and quality are to be maintained and where possible restored and enhanced.
Minerals and Waste	A number of waste facilities exist within the Borough. The percentage of household waste sent for reuse or recycling is lower than that of Suffolk. Opportunities to enhance recycling and composting performance should be sought and sustainable management of waste should be promoted for all new developments.
Transport	The Borough is well connected by transport infrastructure and public transport links. Opportunities should be sought to reduce dependence on the private car and increase the use of sustainable modes of transport such as public transport, walking and cycling. Any new development should be easily accessible by these sustainable transport modes.

SA Topic	Key sustainability issues and opportunities
Economy	Ipswich has a strong employment base for businesses and is a key economic base in the service sector. However there is a high proportion of people who are economically inactive and the jobseekers rate is high, particularly for those who have been unemployed for 6 months or over. Factors contributing to restricting economic growth in Suffolk are a lack of qualified staff, lack of customers, transport links and poor availability of fast broadband. The economy in Ipswich needs to be diversified and skill levels improved so a broader economic base can exist.
Deprivation	Many wards suffer high levels of multiple deprivation, living environment deprivation and income deprivation with crime in Suffolk highest in Ipswich. Therefore reducing crime and increasing security in new developments, together with engaging with local residents, will be essential to create vibrant communities.
Housing	An aging population sees the demand for smaller homes increase, however, since the economic downturn housing completions fell although have risen over recent years. Current housing costs are relatively low but as house prices have increased, incomes have not matched this rate of growth. Housing regeneration and development within the Borough provides opportunities to meet housing needs and improve and revitalise the housing stock.

3.3 The SA Framework

The SA Framework was developed using the review of plans and programmes, baseline data and key sustainability issues and opportunities. The framework comprises a series of 21 SA Objectives which are aspirational goals that Ipswich Borough Council should strive to work towards through the preparation of the Core Strategy. The SA Objectives cover a range of social, economic and environmental issues.

The SA Framework is used to test the sustainability performance of the Core Strategy elements, thereby highlighting its key strengths and weaknesses.

3.4 Which aspects of the Core Strategy were appraised?

The following aspects of the Core Strategy were appraised through the SA:

- The Vision;
- Strategic Objectives;
- Core Strategy Policies; and
- Development Management Policies.

Following the appraisal of the above, recommendations were presented to the plan-makers to adapt the choice of strategy or policy wording in order to minimise adverse effects and maximise benefits.

4 APPRAISAL OF THE CORE STRATEGY AND ALTERNATIVES

4.1 The Vision

The vision for development in Ipswich to 2031 is one that would create a more vibrant, active and attractive modern county town by combining modern development with conserving and

enhancing its historic character. There is emphasis placed upon the need to create a place 'where people aspire to live, work, learn, visit and invest.

This would help reach the goal of attaining social objectives such as housing, employment and education improvements and promote sustainable economic growth by providing accessible job opportunities, both in the town centre and on proposed developments such as Futura Park. Improvements to traffic management and pedestrian, cyclist and bus services and provisions would ensure an effective link between Ipswich and the wider area whilst helping attain air quality, climate change and traffic objectives.

4.2 Strategic Objectives

On the whole the twelve Strategic Objectives and the SA Objectives complement each other with many positive correlations. Strategic issues such as improving access to services and healthcare, reducing poverty and improving the economy, and protecting environmental receptors, are all addressed in a way which meets sustainability.

The only potential incompatibilities were related to the Strategic objective of meeting the needs for housing and supporting growth in the job market for Ipswich. Concerns related to increases in traffic, waste and energy consumption, and the effects on air quality and biodiversity of the Borough. However, these issues are mitigated by another strategic objective relating to new development which aims to ensure designs are sustainable, environmentally friendly and resilient to the effects of climate change.

Three uncertainties associated with the Objective relating to transport due to improvements aimed for sustainable transport and increases in road capacity. This is mitigated against by stating that support will be given for more environmentally friendly travel such as public transport and cycling.

4.3 Core Strategy Policies

The Core Strategy Policies are collectively designed to guide development in Ipswich, and have been grouped together into the following headings for ease of assessment

- Spatial Strategy;
- Development of the Strategy;
- Live;
- Work;
- Learn;
- Play; and
- Infrastructure.

4.3.1 Spatial Strategy (CS2)

The focus for this policy is to establish the majority of new development in the town centre, the Waterfront, Ipswich Village, and Ipswich Garden Suburb while providing this within walking distance of the town's district centres and to support community development. Plans also exist to then deliver housing in the wider Ipswich housing market area.

On the whole the policy for the spatial strategy scored positively against the economic and social SA objectives. The promotion of sustainable growth, development and regeneration will occur across the borough by encouraging residential and retail development to take place in

town centre locations as well as in out-of-town locations such as the proposed Garden Suburb and Futura Park. There is also a heavy focus on improving sustainable travel and access together with dispersing open space throughout the borough.

When evaluated against the environmental SA Objectives, the policy was found to have some negative effects. These negative effects arise from the potential impacts associated with the growth of the Borough. The effects on air quality and traffic were seen as negative due to cumulative impacts from increases in development. There are also large areas of flood zones within the areas for new development such as IP One, therefore it is recommended that these areas are not developed until the proposed flood defence scheme is in place and appropriate flood risk assessments are undertaken. The significant area of new residential development within the Garden Suburb would result in the loss of one of the last remaining large greenfield areas within the borough. This reflects negatively when assessing the effects on local landscape and biodiversity amongst other environmental issues.

An interim traffic modelling report produced for the Core Strategy in August 2015 identified 109 road junctions in the borough where capacities may be exceeded or be significantly congested by 2031. Of these, 11 junctions are located within the AQMAs.

The SA concludes a degree of uncertainty regarding the assessment of air quality and the effects of traffic on the environment and recommends that updated traffic modelling is undertaken together with all future applications continuing to thoroughly assess the cumulative effects of traffic and emissions and deliver robust mitigation in line with other policies within the Core Strategy and the Ipswich Garden Suburb Supplementary Planning Document (SPD).

An element of uncertainty exists in the Core Strategy with regards to the potential development of c.4,000 new dwellings in neighbouring authorities (the wider Ipswich housing market area). It is assumed they would be close to the Ipswich boundary but as such it is not possible to say for certain what the effects on a number of the SA Objectives would be.

Improvements to the sustainability of the policy have been suggested to help improve the Proposed Submission Core Strategy. These include the need for planning applications to thoroughly assess the impacts of traffic and air quality and propose effective measures to mitigate any adverse impacts. Neighbouring authorities should also consider this when allocating land to meet Ipswich's housing needs. The policy should reference that public realm and new structures are of high quality design.

Only one reasonable alternative to the strategy was identified which considers the potential for securing higher density housing construction to meet housing demands. This provides an alternative to the policies stating that the council will work with neighbouring local authorities to address housing need later in the plan period. Whilst this is not possible due to economic conditions at the moment, it could represent a viable alternative should conditions change. This will remove the need outlined in policy, for the council to work with neighbouring local authorities later in the plan period to meet housing needs. However this alternative approach would represent an almost doubling of densities on sites and may therefore lead to greater adverse effects on biodiversity, heritage assets, soil resources and landscape / townscape character, in addition to the reliance it would place upon changing economic circumstances. This is because there is less scope to provide soft landscaping and areas of open space which enhances the natural and built landscape.

A detailed appraisal of the alternative strategy can be found in the full SA Report, which explains further why this was not taken further in the development of the Core Strategy.

4.3.2 Development of Strategy (CS1, CS3, CS4, CS5 and CS6)

There are a number of strong policies in this section with a comprehensive approach to tackling climate change and improving air quality, encouraging sustainable transport and conserving and enhancing the Borough's built, heritage, natural and geological assets. Tackling these issues means the policy performs well at meeting the environmental SA Objectives.

Policy CS3 promotes the development of an IP-One Area Action Plan which promotes economic and social advantages by defining regeneration measures for Ipswich Village, The Waterfront and an Education Quarter. Due to the policy taking on board large scale housing needs in central urban areas, it performs both positively and negatively when looking at the SA Objectives of reducing the effects of transport on the environment, improving air quality and issues surrounding climate change. Although the area has good employment prospects and public transport provisions there will, however, be an increase in road traffic. It is not clear if this will have a significant impact on air quality in the area at this stage.

Policy CS4 seeks to secure the enhancement and promotion of the significance of heritage assets of local importance through the use of planning obligations whilst contributing to local distinctiveness through the use of appropriate design and materials supporting landscape and townscape objectives.

Policy CS6 recognises that joint working with neighbouring authorities is important and it would occur sooner within the plan period. This is likely to benefit plans for more sustainable development. It is not known if this will significantly affect the SA Objectives. This would be particularly beneficial considering a proportion of Ipswich's identified housing need will potentially be met in neighbouring authorities.

Recommendations have been made in order to improve the sustainability performance of the policies. For example, it will be essential that planning applications thoroughly assess the impacts of traffic and air quality to propose effective mitigation measures. Policy could be strengthened by a reference to protecting and enhancing the borough's soil resources. There were overlaps between Policy CS4 (Protecting our Assets) and DM31 (The Natural Environment) however there is still scope to expand policies to protect and enhance the boroughs designated natural assets. Policy should also contain references to ensure new development integrates well in to existing townscape.

A 'do nothing' alternative for all policies was considered and in each case performed worse against the SA Objectives than with the policies in place. This is because of the lack of controls and direction leading to lower environmental standards and fewer opportunities for enhancement. Minor changes have been made since the focussed review. Some of the changes which included reference to carbon reduction targets included supporting environmentally friendly travel help reduce carbon emission which may benefit air quality, the Air Quality Management Areas and local health. Other changes to policies are not considered to have made a significant difference to the SA scores.

4.3.3 Live (CS7, CS8, CS9, CS10, CS11 and CS12)

Within the Core Strategy there are policies which encompass the amount and type of housing required and give some direction to location of housing opportunities. Areas which were previously developed are favoured in comparison with those which were not. This is a sustainable approach which is more likely to avoid areas of ecological and landscape value. The policies on the whole perform strongly against the SA objectives as they set out to meet the needs of different groups and therefore offer guidance towards meeting the housing requirements for the whole community.

The structure of the Garden Suburb and its role in meeting these needs is underlined in the Core Strategy. The uses proposed within it and requirements which follow the SPD, regarding phasing of development and the type of infrastructure provided, as well as how development should meet the overall vision for the comprehensive development of the area are also covered. This policy performs well in meeting the housing and social needs of Ipswich and giving good access to service provisions for new residents.

Given the proposal for the Garden Suburb is located on greenfield land, it is considered likely that it would affect the local landscape and other environmental features. The siting of 1,800 dwellings on wind fall sites is also likely to affect environmental concerns such as air quality and even AQMAs dependant on where these are located. These impacts may be reduced through effective planning and mitigation and such measures are required in the Ipswich Garden Suburb SPD. There is also a significant emphasis in the policies of the Core Strategy to promote sustainable travel which will help reduce these impacts. Amendments through the Pre-Submission Main Modifications add greater certainty to the delivery of the required infrastructure through reference to use of compulsory purchase powers if necessary.

To help improve the performance of these policies it has been suggested that further consideration is given to effects on traffic and air quality when working with neighbouring authorities to address housing need later in the plan period. This will ensure effective mitigation is in place as set out in the associated guidance such as the SPD. Policies could also be strengthened in terms of heritage and conservation by adding newer specific clauses for assets.

Some minor changes occurred to policies for alternative methods but these are not considered to be significant when meeting SA Objectives. The Alternative 'do nothing' approach was considered for some policies but these were considered to perform worse against the SA objectives. Without the correct mix and integration of policies this would lead to a developer-led approach for housing which is less likely to deliver in terms of local needs and affordability.

4.3.4 Work (CS13 and CS14)

The Core Strategy includes policies which specifically seek to provide opportunities to improve employment and economic gains. They aim to reduce employment deprivation, improve vitality and encourage new business formation. This can help meet a number of social SA objectives by encouraging healthier lifestyles through increased walking and cycling in a more economic vibrant town centre. The Core Strategy has identified sufficient employment land to meet the Employment Land Needs Assessment (2015).

The result of the creation of new employment opportunities may also result in potentially negative environmental effects such as an increase in traffic, waste, use of energy and effects on biodiversity. This depends on the design and their location.

There is a spread of proposed employment site locations with many in the town centre but many others located throughout the borough. The policy has both positive and negative effects on the SA as there is potential for regeneration of previously developed sites and to improve the character of some areas through mitigation and enhancement measures. However, in order to reduce adverse effects, it should be ensured that the 30ha or more of new employment development is located away from statutory designated sites and is well integrated into the existing environment.

To further improve the sustainability performance of the policies it will be essential that planning applications thoroughly assess the impacts from traffic and effects on air quality and to mitigate these effectively using policy. It may be appropriate for sites which would be protected by the implementation of the Ipswich Flood Defence Scheme to be developed in the medium to long term.

The alternative of a 'do nothing' approach in each case again performed worse against the SA Objectives than that with the policies in place.

4.3.5 Learn (CS15)

Policy CS15 outlines provisions for good educational facilities in the borough and performs well when looked at with social and economic policies. This is partly due to providing facilities in accessible locations which enables opportunities to walk and cycle, and also support the growth and development of the centre.

The development of educational facilities on previously developed land would represent a positive use of land resources and protect biodiversity. However, this would not be the case if developing these facilities in an area such as the Garden Suburb.

Adverse effects can be mitigated by ensuring high quality design that complements and enhances the character and the quality of the townscape. A measure to improve sustainability performance of this policy would be to provide a link to the Travel Ipswich scheme.

The alternative 'do nothing' was considered for this policy but performed worse against the SA objectives due to no guidance being put in place to support educational provision to meet the local need. Minor changes have been made since the focussed review, however, they are not considered to have made a significant difference to the SA on the whole.

4.3.6 Play (CS16)

Within the core strategy there are policies which seek to enhance the ecological network and open spaces across Ipswich. This performs well against many of the SA Objectives because policies are in place to help conserve and maintain the local townscape and landscape. The policies help to encourage more sustainable movement across networks, and encourage healthy lifestyles through providing accessible open spaces and recreational facilities.

By providing good access to shops, services and facilities this may improve the image of local areas for people who want to visit, work or live there.

Minor changes were made from the focussed review which included support for the provision of an extension to the Orwell County Park. This further provides opportunities for the health and wellbeing of the borough to be improved. There are no mitigation or enhancement measures suggested. The alternative approach of 'do nothing' was considered which performed worse against SA Objectives as there would be no guidance in place to help secure the provisions mentioned above.

4.3.7 Infrastructure (CS17, CS18, CS19 and CS20)

The Core Strategy's policies relating to infrastructure collectively seek to ensure infrastructure needs associated with new development are met. These policies scored largely positive and neutral effects across the social, environmental and economic SA Objectives. Congestion relief and road capacity issues are addressed which will help access across the borough. This allows for greater access to open space and facilities for leisure activities and thus provides health and social benefits. Measures to facilitate walking and cycling are also addressed within CS20 providing benefits to improving access, health and reducing traffic effects upon the environment. The provision of a Country Park with CS17 would also enable the conservation and enhancement of biodiversity, landscape and townscape.

Better infrastructure provision also greatly encourages sustainable economic growth and facilitates new business formation. Town centre enhancements also help with pedestrian access

and the general attrition of more visitors which supports the local economy. The policies also support the implementation of flood defences and so offer benefits to those areas at risk of flooding.

Minor changes were made following the focussed review and these are not considered to be significant to the SA Objective scores. There are no suggested mitigation or enhancement measures. The alternative approach of 'do nothing' has also been considered and performed worse against the SA Objectives than with the policies in place. The reasons for this are that there would be fewer opportunities for providing control and direction, lower environmental standards and fewer opportunities for enhancement and regeneration.

4.4 Development Management Policies

The following sections present a summary of the SA of the development management policies outlined in the core strategy. The Development Management Policies were assessed in groups to ease the assessment.

4.4.1 Sustainable Development, Flooding and Sustainable Drainage (DM1, DM2, DM3 and DM4)

The policies grouped under this title seek to promote sustainable development and as such they performed well when viewed against the SA Objectives. Policies which influence renewable energy and low carbon energy schemes, however, do have the potential to impact the local environment such as landscape and biodiversity (particularly birds and bats with regards to wind turbines). To provide enhancement and mitigation to these policies there is the need for any future energy developments to be fully assessed and only proposals which do not have significant adverse effects on the environment be progressed.

By providing Sustainable (Urban) Drainage Systems where appropriate the policy ensures that new developments do not exacerbate current flooding risks. Water efficiency is also maximised in new developments to help sustainability. Committing to a minimum BREEAM standard may help encourage investment.

Sustainability and the environment are also maintained as part of meeting economic SA Objectives by ensuring development reaches sustainability benchmark levels by BREEAM as well as reductions in CO₂ emissions of 19% below the Target Emission Rate of the 2013 Building Regulations (Part L) and meeting water efficiency standards of 110 litres/person/day. Providing development is accessible, the provision of sustainable homes and offices will contribute to the growth and encourage investment in the borough. This is also achieved through the supporting text to DM1 with the introduction of the Home Quality Mark which demonstrates factors including energy use and air quality.

The 'do nothing' approach (no equivalent policies proposed) performed worse against the SA Objectives. There have been only minor changes to the policies for the Core Strategy since the focussed review. These changes include lower standards for BREEAM, CO₂ emissions reductions and water standards, although certain benchmarks are still met. The standards are now more viable, achievable and deliverable which could lead to more developers meeting the standards.

4.4.2 Urban Design Policies and Protecting Our Assets (DM5, DM6, DM8, DM9 and DM10)

These policies performed well against the environmental SA Objectives due to measures which benefit landscape, townscape and heritage. These measures include retaining buildings of

interest, protecting the character of urban areas including urban greening which in turn helps protect biodiversity and can contribute to improving air quality.

Regarding the social and economic SA Objectives, the policies that promote mixed use developments and neighbourhoods do not have any significant adverse effects. However benefits were noted such as promoting a reduced need to travel and improving access to key local services such as GPs. improved design and layouts in developments can provide opportunities for cyclists and sustainable forms of transport. This can ultimately improve local health levels and can help to combat obesity. Improvements to the built environment can also encourage investment and help the local economy to thrive.

To further improve the sustainability of these policies it has been suggested that a reference to specific legislation regarding the protection of important hedgerows should be included. An alternative 'do nothing' approach to the policies was considered and in each case performed worse against the SA Objectives due to fewer opportunities for controls and enhancement than outlined in the implementation of the policies.

Changes such as the expansion of policy to cover historic assets as well as conservation areas now protect historic environmental features and heritage assets within Ipswich. These changes to the assessment against SA Objectives Policies within the Core Strategy seek to ensure high quality design whilst protecting the borough's built and natural assets. Minor changes have been made to individual policies since the focussed review which are thought not to have made a significant difference.

Policy DM5 contributes towards meeting housing requirements for the whole community as well as improving health through requiring the provision of a proportion of affordable housing as well as taking account of the new optional Building Regulations standards relating to accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings

4.4.3 Small Scale Residential Development, Small Scale Infill and Backland Residential Development, Subdivision of Family Dwellings, Affordable Housing and the Density of Residential Development (DM12, DM13, DM14, DM24 and DM30)

The policies in this area were assessed on the details relating to the type and make up of new housing. They perform well against the SA Objectives due to policies seeking to ensure there is the right mix of new homes to meet local needs.

The location of some housing which is of a higher density in the town centre means more homes may be located in flood zones and may increase the traffic in the four central areas with AQMA's. However, the policies do promote higher density homes in areas which are appropriate

to the existing townscape. In addition, there are more accessible locations closer to amenities, jobs and transport hubs.

To improve the sustainability performance of these policies it is recommended that the loss of green space should be resisted where it would result in a significant loss of vegetation and valuable habitats.

4.4.4 Transport and Access (DM17 and DM18)

In this area the policies ensure that sustainable traffic patterns are promoted within new developments. This includes ensuring that traffic congestion impacts are reduced and new development does not significantly affect rights of way or the local road network.

Policy DM17 states that new development should not significantly impact on rights of way or the local road network in respect to traffic capacity, highway safety, air quality or the four AQMAs. This ensures that in promoting sustainable growth there would be a number of positive effects recorded against the SA Objectives.

No mitigation or enhancement measures were suggested to improve the sustainability performance of these policies. The 'do nothing' approach performed worse against the SA Objectives than having the policy in place. The reason for this is that there would be fewer opportunities for providing control and direction for introducing sustainable transport measures. This could result in an increase in private car use which could therefore lead to greater adverse effects on air quality.

4.4.5 Retail and Defined Centres (DM20, DM21, DM22 and DM23)

The policies surrounding the development of retail areas within the borough performed well against the SA Objectives. The policies place emphasis on providing retail and community facilities within defined District and Local Centres deterring inappropriate use and thus creating accessible, sustainable and economically viable areas.

There are no mitigation or enhancement measures suggested to improve the sustainability performance of the policies. Minor changes have been made to some of the policies for retail development but none are considered to have a significant impact on the SA Objectives. The alternative 'do nothing' approach was considered but performed worse against the SA Objectives than with the policies in place. This is because without the policy controlling the development, more out of town retail units could be developed which don't meet the needs of the borough and may lead to adverse effects on traffic and the environment.

4.4.6 Employment Land (DM25)

The policy includes a list of employment areas which are safeguarded for future use. This will allow opportunities for the economy and job market to grow, including new jobs, diversification in employment opportunities and encouragement of new business formation. This performs well against many of the SA Objectives relating to economic and social factors.

For the environmental SA Objectives the policy shows some negative effects and some uncertainties. With increased business sector development the cumulative effect of increased traffic can create greater pollution levels and waste, however, if employment areas are clustered then there will be more opportunities for sustainable transport methods as well as the provision of adequate waste facilities. With increases in waste production, loss of habitat and increased flood risk specifically within IP-One employment area, the policy again creates potentially negative environmental effects that would require mitigation.

Further amendments to the policy were proposed through the Pre-Submission Main Modifications to clarify how Starter Homes should be considered in relation to employment land.

To help improve the sustainability of this policy the negative effects on water quality and pollution impacts can be mitigated by implementing and following practices in the Environment Agency's pollution prevention guidelines.

Considering the 'do nothing' approach led to a worse performance against SA Objectives than with the policy in place. This is because there would be less direction for employment land which could lead to inefficiency in development and potentially greater impacts once in operation.

4.4.7 Amenity, Open Space, Sport and Recreation and Community Facilities (DM26, DM27, DM28, DM29 and DM32)

The Core Strategy sets out policies which aim to govern non-residential use of land, protecting amenity and provide open space, sport and recreational facilities.

When assessed against the environmental and the social SA Objectives the policy effects were largely positive as providing and protecting open space increases opportunities for nature conservation and flood storage as well as benefiting the townscape character. Providing leisure spaces and promoting healthier lifestyles results in positive social impacts including encouraging healthy lifestyles. The policies also seek to ensure that development that causes potential pollution and health issues are not permitted.

The policies' performance against the economic SA Objectives was largely neutral but indirectly the commitment to provide local community facilities may help to ensure district and local centres remain viable.

Minor changes were made since the focussed review but these did not make any significant differences to SA Objectives. No mitigation or enhancement measures were suggested to improve the policies performance against SA Objectives. The 'do nothing' approach was considered and performed worse due to fewer control and direction measures being in place together with fewer opportunities to enhance local amenity value.

4.4.8 The Natural Environment (DM31, DM33 and DM34)

Policies within the Core Strategy seek to guard the natural environment against inappropriate development and provide and enhance green infrastructure. Since the focussed review there have been significant changes to these policies. Provisions are made for protection of the whole natural environment rather than specific parts of it. This policy ensures the provision of a good network of habitats and wildlife corridors which are interconnected to promote biodiversity. Protection for designated local and European sites is provided and reinforced with Policy DM1 making requirements for development to conserve the nature conservation and geodiversity interest of County Wildlife Sites, Regionally Important Geological Sites and County Geological Sites. In addition where possible, enhancements for protected sites and protected priority species would be expected. Aims to protect land and water quality also exist within the policies. As a result, when assessed against the environmental SA Objectives, the policies naturally performed well with many positive outcomes expected.

When assessed against the social SA Objectives the policies were found to contribute to the promotion of healthy lifestyles by providing open spaces and green spaces which may encourage people to walk or cycle and remain active. Assessment of the policies against the

economic SA Objectives was considered neutral, however, indirectly, investment potential may be boosted by creating a greener and more attractive urban centre.

It has been suggested that Policy DM31 could be strengthened through making reference to whether it was interpreted as standalone policy or viewed in combination with other proposals. Alternative 'do nothing' approaches were considered but performed worse when looked at with the SA Objectives due to there being less protection for the natural environment.

5 CUMULATIVE IMPACTS

The proposed Core Strategy contains policies which would not be implemented in isolation. Therefore the assessment of these policies has been undertaken in a manner which has enabled the cumulative effects of the policies to be assessed.

Potential cumulative effects have also been considered in relation to sites located on the edge of the town but outside the Borough boundary. These sites are:

- Babergh / Ipswich fringe allocation (approximately 350 homes at south west Ipswich) (Babergh Core Strategy and Policies, February 2014)
- Sproughton Strategic Employment Site allocation (former Sugar Beet Factory site) (Babergh Core Strategy and Policies, February 2014)
- Adastral Park (2,000 homes at Martlesham) (Suffolk Coastal Core Strategy and Development Management Policies, 2013)
- Trinity Park (Suffolk Coastal – planning permission)

The provision of 350 homes at the Babergh / Ipswich Fringe, residential development at Trinity Park to the east of Ipswich and 2,000 dwellings at Adastral Park will cumulatively support meeting community housing requirements. The Sproughton Strategic Employment site allocation (in the Babergh Core Strategy) will cumulatively support economic growth.

The provisions of policies within the Core Strategy largely have a positive cumulative effect complementing each other well when viewed together in terms of sustainability. Cumulative benefits from policies are identified on receptors such as; education provision/attainment, crime and fear of crime, access to goods and services, health and wellbeing, housing, sustainable economic growth, biodiversity, landscape, water resources and climate change.

However negative and cumulative effects were predicted for air quality, natural resources, climate change, energy efficiency and sustainable travel / transport.

It's worth noting that negative cumulative effects would largely be mitigated through other policies in the Core Strategy and associated documents.

The cumulative effects were also considered to be the significant effects. The mitigation measures proposed were addressed through the Proposed Submission Core Strategy, as detailed in the Annex to Proposed Submission Sustainability Appraisal Reports – Addressing Recommendations (Ipswich Borough Council, December 2014). No further mitigation measures were proposed as part of the SA of the Pre-Submission Main Modifications.

6 MONITORING

Monitoring is an ongoing process, integral to the implementation of the Core Strategy and a requirement of the SA process. The monitoring framework has been developed to measure the performance of the Core Strategy against changes in defined indicators that are linked to its implementation. Therefore the monitoring framework has been designed to focus on significant sustainability effects identified during the SA. As well as monitoring specific indicators there is a need for contextual monitoring of social, environmental and economic change. A thorough analysis of all of the data collated and emerging trends will be important.

A monitoring framework is presented in the SA Report which identifies the effects that should be monitored, when and the indicators and targets used for each SA Objective. Monitoring should occur throughout the lifetime of the Proposed Core Strategy. It should be noted that benefits would be realised from monitoring at different geographical scales. It is important to consider the overall changes to Ipswich Borough Council as a whole, as well as considering the changes within individual settlements and local wards.