



# Strategic Environmental Assessment and Sustainability Appraisal

Focused Review of the Core Strategy and Policies  
Development Plan Document

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Interim SA Report



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## Ipswich Borough Council

# Strategic Environmental Assessment and Sustainability Appraisal

## Focused Review of the Core Strategy and Policies Development Plan Document

### Interim SA Report

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# CONTENTS

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ABBREVIATIONS.....	iii
1 INTRODUCTION.....	4
1.1 Background to and Purpose of the Review of the Core Strategy.....	4
1.2 Background to and Purpose of the SA Report.....	6
1.3 Structure of this SA Report.....	<del>6</del> 7
2 SUSTAINABILITY APPRAISAL.....	8
2.1 Legal Requirements.....	8
2.2 Stages in the SA Process.....	8
2.3 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope.....	11
2.4 Stage B: Developing and Refining Options and Assessing Effects....	34
2.5 Stage C: Preparation of the SA Report.....	37
2.6 Stage D: Consultation on the Core Strategy Focused Review and the SA Report.....	37
3 APPRAISAL OF THE ALTERNATIVES.....	38
3.1 Appraisal of Alternatives (SA 2009).....	38
3.2 Appraisal of Alternatives (Focused Review of Core Strategy).....	38
4 APPRAISAL OF THE CHANGES TO THE CORE STRATEGY.....	43
4.1 Introduction.....	43
4.2 Appraisal of the Vision and Objectives.....	43
4.3 Appraisal of Policy Changes.....	43
4.4 Cumulative Effects.....	46
5 NEXT STEPS.....	49

## Appendices

- Appendix A  
Review of Plans, Programmes and Environmental Protection  
Objectives
- Appendix B  
Baseline Data
- Appendix C  
Sieve analysis of changes to policies
- Appendix D  
Scoping Report Comments
- Appendix E

Sustainability appraisal of alternatives  
Appendix F  
Sustainability Appraisal of Revised Policies

# ABBREVIATIONS

AMR	Authority Monitoring Report
AQMA	Air Quality Management Area
CWS	County Wildlife Site
CIL	Community Infrastructure Levy
DCLG	Department for Communities and Local Government
DECC	Department of Energy and Climate Change
DPD	Development Plan Document
EIA	Environmental Impact Assessment
IBC	Ipswich Borough Council
ICT	Information and Communication Technology
LDF	Local Development Framework
LNR	Local Nature Reserve
LSC	Learning and Skills Council
LSOA	Lower Super Output Area
NPPF	National Planning Policy Framework
NVQ	National Vocational Qualification
ODPM	Office of the Deputy Prime Minister
ONS	Office for National Statistics
SA	Sustainability Appraisal
SAC	Special Area of Protection
SBRC	Suffolk Biodiversity Records Centre
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
PPPs	Plans, Policies, Programmes

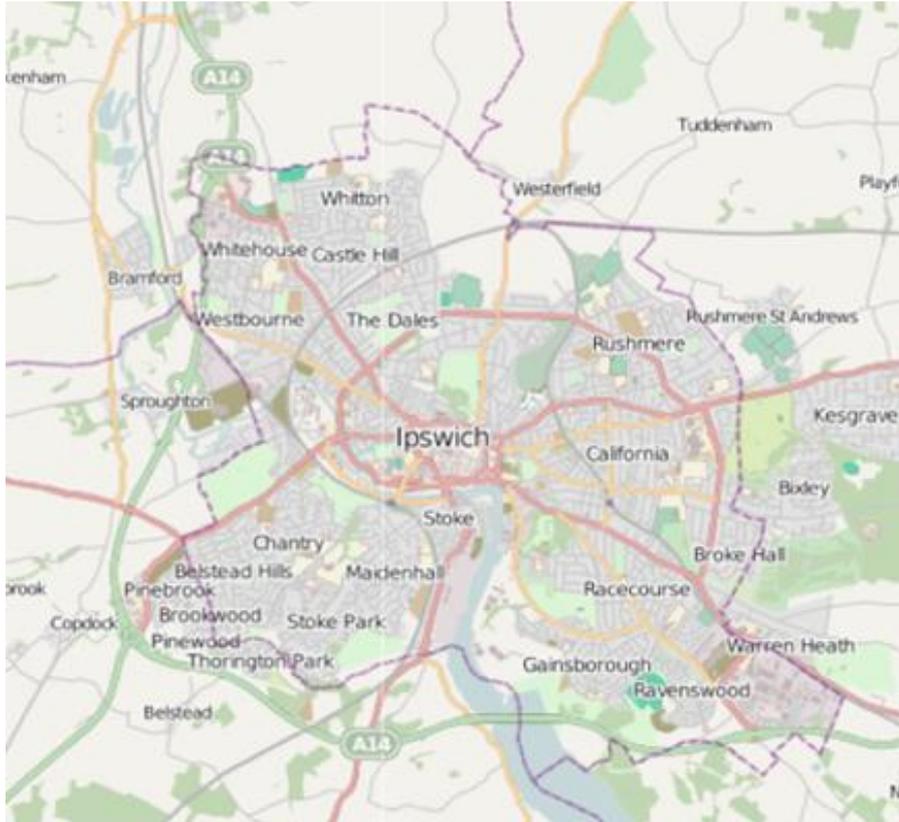
# 1 INTRODUCTION

- 1.1.1. Ipswich Borough Council (IBC) adopted its Core Strategy in December 2011. It guides new development and land use in the Borough up to 2027. The Council is now in the process of conducting a focused review of its Core Strategy and Policies Development Plan Document. It is also preparing a second plan, the Site Allocations Development Plan Document, which will provide detailed site allocations and guidance across the Borough. It will incorporate specific planning guidance for a defined area of central Ipswich known as IP-One.
- 1.1.2. As part of the preparation process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is being undertaken. The term SA shall be used to refer to the combined SA/SEA for the remainder of this report. This report presents the process and findings of the SA of the Focused Review of the Core Strategy and Policies DPD.

## 1.1 Background to and Purpose of the Review of the Core Strategy

- 1.1.3. The Council is required to keep the plan under review and this focused review updates the adopted plan of December 2011. It updates the plan with regards recent legislation, such as the Localism Act in 2011, and the National Planning Policy Framework in March 2012. More up to date statistics relating to the town are included.
- 1.1.4. The focused review of the Core Strategy revisits in particular the Borough's housing and employment figures and looks ahead to 2031. The adopted Core Strategy identified a large greenfield area on the northern edge of Ipswich (known as the Northern Fringe) as the main area for development after 2021. It also allocated the first part of this land for development prior to 2021. The Draft Core Strategy Focused Review considers the need to make a strategic allocation of the remaining land in the area. Employment and retail target figures have been revisited to reflect the projected population growth and needs identified in the most recent studies.

Figure 1-1 Ipswich Borough Council map



The Focused Review Core Strategy provided updates to the following key elements:

- The Context
- The Strategy
- Vision and Objectives
- Development Management Policies
- Implementation, Targets, Monitoring and Review

1.1.5. The principal material changes will be to CS7 housing figures, CS10 Ipswich Northern Fringe, CS13 job figures, CS14 retail figures and CS17 infrastructure. There will be minor changes to many more policies but no policies are being deleted or new ones added.

1.1.6. The preparation of the review of the Core Strategy commenced in February 2013 and the scoping consultation ran between Friday 25th October and Thursday 28th November 2013. Representations received from stakeholders and the public alike were considered when drafting the Core Strategy and the corresponding SA Report.

1.1.7. Table 1-1 presents an indicative programme for the Core Strategy Focused Review and future consultation dates.

Table 1-1 Indicative Programme for the Core Strategy Focused Review

Core Strategy Date	Stage/Element of the Core Strategy
February – December 2013	Development of the Core Strategy Focused Review
January to March 2014	Informal consultation on the Core Strategy Focused Review
March to April 2014	Consider comments and Core Strategy Focused Review

July to August 2014	Formal publication and consultation period for the Core Strategy Focused Review
Sept/Oct 2014	Submission
March 2015	Independent examination of Core Strategy Focused Review by a planning inspector
July 2015	Formal adoption of the Core Strategy Focused Review

## 1.2 Background to and Purpose of the SA Report

1.2.1 Previously, a SA was undertaken for the Draft Submission Core Strategy and Policies in 2009. However, due to the changes to some policies, a SA is now being prepared to assess the changes resulting from the Focused Review. An Appropriate Assessment for the Core Strategy and Policies was published in September 2009. Following comments from consultees, an Addendum was prepared to respond to changes since the September 2009. The Appropriate Assessment is being updated to take account of the Focused Review.

1.2.2 SA (incorporating the requirements of the SEA Directive<sup>1</sup>) has been undertaken on the Focused Review Core Strategy throughout its development. SA is an essential tool for ensuring that the principles of sustainable development are inherent throughout the preparation of the Core Strategy and that it broadly complies with the relevant planning guidance. The overarching aim of the process is to contribute to better decision-making and planning. SA is an iterative process and follows a series of prescribed stages (refer to Section 2.2) in which the elements of the Core Strategy are appraised against Sustainability Objectives, to encourage the selection of the most sustainable options and to ultimately improve the sustainability of the development that is brought forward.

This Interim SA Report provides a summary of the SA process so far and presents the initial findings and recommendations of the assessment of the Core Strategy Focused Review. The key aims are to:

- Provide information on the Core Strategy Focused Review and the SA process;
- Present the key existing social, economic and environmental conditions within Ipswich, in the context of existing plans, programmes and environmental protection objectives, together with relevant baseline information;
- Identify, describe and evaluate the likely significant effects of the changes to the Core Strategy;
- Recommend measures to avoid, reduce or offset any potentially significant adverse effects.

**It is essential that the Focused Review Core Strategy is read in conjunction with this SA Report.**

## 1.3 Structure of this SA Report

1.3.1 Table 1-2 provides an outline of the contents and structure of this SA Report.

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<sup>1</sup> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, June 2001

**Table 1-2 Contents and Structure of this SA Report**

Section of SA Report	Outline Content
Abbreviations	Abbreviations used in this report.
1: Introduction	Provides the background to, purpose of, and structure of the Core Strategy Focused Review and this SA Report.
2: Sustainability Appraisal	This section outlines the legal requirements for the SA. It outlines the key elements of the SA process and the approach adopted for appraising the effects of the Core Strategy Focused Review (including the SA Framework), together with an overview of the consultation requirements.
3: The Core Strategy Alternatives	Outlines the development of alternative options that were considered and appraised as part of the changes to the Core Strategy.
4: Appraisal of the Core Strategy	Presents the appraisal of the policy changes in the Core Strategy against the SA Framework including cumulative effects.
5: Next Steps	Identifies the next steps in the SA process, following consultation on this SA Report. Details of how to comment upon this SA Report are also provided.
Appendix A	Presents an update of relevant Plans, Programmes and Environmental Protection Objectives and their relationship/conflicts with the Core Strategy.
Appendix B	Contains the baseline data, a summary of which is presented in Chapter 2.
Appendix C	Sieve analysis of changes to policies
Appendix D	Scoping report comments
Appendix E	Sustainability appraisal of alternatives
Appendix F	Sustainability appraisal of revised policies

## 2 SUSTAINABILITY APPRAISAL

### 2.1 Legal Requirements

- 2.1.1 It is a legal requirement that the Review of the Core Strategy is subject to SA, under the Planning and Compulsory Purchase Act 2004. This Act stipulates that the SA must comply with the requirements of the SEA Directive which was transposed directly into UK law through the SEA Regulations<sup>2</sup>.
- 2.1.2 The aim of the SEA is to *'provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development'* (Article 1 of the SEA Directive).
- 2.1.3 A combined SA and SEA has been undertaken, as the Core Strategy has the potential to have a range of significant sustainability effects (both positive and negative). The SA has been undertaken in accordance with guidance from the published Government guidance on SEA<sup>3</sup> (hereafter referred to as the Practical Guide).

### 2.2 Stages in the SA Process

- 2.2.1 Although there are formalised approaches for both SA and SEA, only the latter has a legal obligation to perform certain activities as stipulated in the SEA Directive. These legal obligations have been adhered to throughout the SA process by following a series of prescribed stages, through which the elements of the Core Strategy have been appraised using Sustainability Objectives (Table 2-1 provides further detail).
- 2.2.2 Table 2-1 presents a summary of the key stages of the SA process, together with the SEA Directive requirements for each stage. Reference is given to where the requirements have been addressed within this Interim SA Report. Following consultation on this Interim Report, a draft SA will be prepared.

Table 2-1 Stages in the SA Process and SEA Directive Requirements

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Core Strategy
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b>			
A1: Identifying other relevant policies, plans and programmes and sustainability objectives	The Environment Report should provide information on: <i>"the relationship (of the plan or programme) with other relevant plans and programmes"</i> (Annex 1(a)) <i>"the environmental protection objectives, established at international (European) Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation"</i> (Annex 1(e))	Chapter 2 and Appendix A.	Stage A corresponds to the scoping stage of the SA and the findings of this stage are presented in the Scoping Report that was consulted upon in October / November 2013.  During this stage the scope of the SA for the Core Strategy

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<sup>2</sup> S.I. 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations, 2004

<sup>3</sup> ODPM *et al.* (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Core Strategy
A2: Collecting baseline information	The Environment Report should provide information on: <i>“relevant aspects of the current state of the environment and the likely evolution thereof without its implementation of the plan or programme” and, ‘the environmental characteristics of the areas likely to be significantly affected”</i> (Annex 1(b), (c))  <i>“any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC”</i> (Annex 1 (c))	Chapter 2 and Appendix B	Focused Review was defined.
A3: Identifying sustainability issues and problems		Chapter 2	
A4: Developing the SA Framework	N/A	Chapter 2	
A5: Consulting on the scope of the SA	<i>The authorities referred to in Article 6(3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.(Article 5.4)</i>	The scope of the appraisal is presented in Chapter 2.  A Scoping Report was produced and consulted upon.	
<b>Stage B: Developing and Refining Options and Assessing Effects</b>			
B1: Testing the Local Plan’s objectives against the SA Framework	The Environment Report should consider <i>“reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” and give “an outline of the reasons for selecting the alternatives dealt with”</i> (Article 5.1 and Annex I(h))	Chapter 3	Stage B of the SEA process is linked to the overall production of the Core Strategy which includes the development of the policy options and the finalisation of the preferred options.  The Core Strategy Focused Review identified changes to policies. Initially, sieve analysis of the changes to policies was undertaken. This analysis identified whether the changes were minor and therefore, the findings of the previous SA still applied. Where there were significant changes, these policies were assessed against the SA Objectives.  This Interim SA Report presents the findings of the sustainability assessment and will be consulted on to obtain feedback from stakeholders.
B2: Developing the Core Strategy Options	In the Environmental Report, <i>“the likely significant effects on the environment of implementing the plan or programme ... and reasonable alternatives ... are [to be] identified, described and evaluated”</i> (Article 5.1)		
B3: Predicting the effects of the Core Strategy			
B4: Evaluating the effects of the Core Strategy			
B5: Considering ways of mitigating adverse effects and maximising beneficial effects	Annex I (g) states that it should also include <i>“measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme...”</i>		
B6: Proposing measures to monitor the significant effects	<i>The Environmental Report should provide information on “a description of the measures envisaged concerning monitoring”</i> (Annex I (i))		

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Core Strategy
of implementing the Core Strategy			
<b>Stage C: Preparing the SA Report</b>			
C1: Preparing the SA Report	Article 5.1 contains the requirement for an environmental report to be produced where an assessment is required. The environmental report “ <i>shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication..</i> ” (Article 5.2). Details of the information to be given in the Environmental Report are provided in Annex 1.	This Interim SA will inform the preparation of the draft SA Report. Following the informal consultation, a draft SA Report will be prepared	The draft SA Report will be produced in line with the requirements of the SEA Directive for producing an Environmental Report. A Non Technical Summary will also be provided with the SA Report.
<b>Stage D: Consultation on the Core Strategy and the SA Report</b>			
D1: Public participation on the proposed submission documents	Article 6 contains the requirements for the draft plan or programme and the environmental report to be made available to statutory authorities and the public. They should be given an ‘ <i>early and effective opportunity within time frames to express their opinions</i> ’ (Article 6.2).		The Submission SA Report and the Core Strategy will be consulted upon in accordance with Regulation 19 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012.
D2: Appraising significant changes resulting from representations	N/A	N/A	Following the receipt of representations, the SA Report may need to be updated to reflect comments received. The SA Report will need to be updated to accompany the Publication (Regulation 22) version of the Core Strategy. It will be essential for the SA Report and the Strategy to remain consistent.
D3: Making decisions and providing information			
<b>Stage E: Monitoring the significant effects of implementing the Core Strategy</b>			
E1: Finalising aims and methods for monitoring	“ <i>Member States shall monitor the significant environmental effects of the implementation of plans and programmes... in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action</i> ” (Article 10.1)		Monitoring undertaken for the SA process should feed into the Authority Monitoring Report (AMR).
E2: Responding to adverse effects			

2.2.3 The following sections detail the activities that have been, and are proposed to be, undertaken at each stage of the SA process. This provides context and background to the SA including its agreed scope, the methodology for the appraisal of the Core Strategy, and the technical limitations to the appraisal.

## 2.3 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope

### Review of Plans, Policies and Environmental Protection Objectives

2.3.1 The box below stipulates the SEA Directive requirements for this stage of the process.

#### **Box 1: SEA Directive Requirements for the Review of Plans Programmes and Environmental Protection Objectives**

*The SEA Directive requires that the SEA covers:*

*'an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes' (Annex 1 (a)).*

*'the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation' (Annex 1 (e))*

2.3.2 A review of other plans and programmes that may affect the preparation of the DPD has been undertaken in order to contribute to the development of both the SA and the DPD. This included:

- Identification of any external social, environmental or economic objectives, indicators or targets that should be reflected in the SA process.
- Identification of any baseline data relevant to the SA.
- Identification of any external factors that might influence the preparation of the plan, for example sustainability issues.
- Identification of any external objectives or aims that would contribute positively to the development of the Core Strategy.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the Core Strategy.

2.3.3 The review included documents prepared at international, national, regional and local scale. A brief summary of the documents reviewed and the main findings are summarised below with further details presented in Appendix A.

#### International Plans and Programmes

2.3.4 A review was undertaken of key International Conventions and European Directives that could potentially influence the development of the Core Strategy and the SA. European Directives are transposed into national legislation in each individual Member State and, therefore, there should be a trickle-down effect of the key principles and an application to the relevant national, regional and local circumstances in other planning documents.

#### National Plans and Programmes

2.3.5 A review was undertaken of relevant White Papers, plans and strategies. One of the most important documents reviewed was the UK Sustainable Development Strategy<sup>4</sup> which outlines the over-arching Government objective to raise the quality of life in our communities.

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<sup>4</sup> UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)

- 2.3.6 Central Government establishes the broad guidelines and policies for a variety of different topics which are now brought together in the National Planning Policy Framework (NPPF). The NPPF streamlines national planning policy into a consolidated set of priorities to consider when planning for and deciding on new development.
- 2.3.7 It sets national priorities and rules only where it is necessary to do so. It aims to ensure that planning decisions reflect genuine national objectives - such as the need to safeguard the natural environment, combat climate change, and to support sustainable local growth - while allowing for local authorities and communities to produce their own plans, reflecting the distinctive needs and priorities of different parts of the country. The principle of sustainable development is at the heart of the NPPF.
- 2.3.8 The NPPF guidance is structured around the following sections:
- Building a strong, competitive economy;
  - Ensuring the vitality of town centres;
  - Supporting a prosperous rural economy;
  - Promoting sustainable transport;
  - Supporting high quality communications infrastructure;
  - Delivering a wide choice of high quality homes;
  - Requiring good design;
  - Promoting healthy communities;
  - Protecting Green Belt land;
  - Meeting the challenge of climate change, flooding and coastal change;
  - Conserving and enhancing the natural environment;
  - Conserving and enhancing the historic environment;
  - Facilitating the sustainable use of minerals;
  - Plan-making; and
  - Decision-taking.

## Regional Level Plans

- 2.3.9 A wealth of different plans and strategies have been produced at the regional (East Anglia/East of England) and county (Suffolk ) level covering a variety of topics including; housing; economic development and performance; climate change (including flood risk); renewable energy; innovation; rural development; waste management; accessibility; equality and diversity; health; waste; cultural provision and diversity; and physical activity. All of the objectives of these plans as well as some of the challenges they raise need to be taken on board and driven forward by the Borough as appropriate. However, it must be noted that the overarching goals of some of these plans and strategies may be outside the remit of the Core Strategy which forms only an individual part of a number of different vehicles trying to deliver regional and sub- regional targets.
- 2.3.10 The Localism Act was granted Royal Assent on 15th November 2011. This Act seeks to rescind some regional planning documents, and as such, the East of England Plan (Regional Spatial Strategy) (2008) has been revoked.

## Local Policy

- 2.3.11 Plans produced at the local level specifically address issues relating to the economy; health; safety; tourism; sustainable communities; housing; employment; and physical activity. The Core Strategy and the SA should draw from these documents and transpose their aims in their

policies and proposals. These plans should in theory have included the main influences of international, national, regional and county level plans through the 'trickle-down effect'. They should also provide more of a local focus for the Borough. It is, through identifying these themes and incorporating them into the DPD that synergies can be achieved with other relevant documents.

## Key Results from the Review

2.3.12 There were many common themes emerging through the review of plans, programmes and environmental protection objectives. The list below provides a summary of the main themes and issues identified:

- The need to reduce greenhouse gas emissions and increase energy efficiency.
- The need to ensure that new housing development meets local needs (for all sections of society).
- The need to protect and enhance the vibrancy of centres.
- The need for the protection and enhancement of the quality and character of urban areas.
- Recognising the need for the townscape to evolve and for development to be appropriate to townscape setting and context.
- Recognising the importance of improving and developing cultural assets.
- The need to conserve and enhance biodiversity as an integral part of economic, social and environmental development.
- The need to protect and enhance the historic environment. The Government has an overarching aim for the conservation and enjoyment of the historic environment and heritage assets.
- The need to promote sensitive waste management.
- The need to develop transport and infrastructure that supports sustainable growth.
- The need to promote more sustainable transport choices and to improve accessibility.
- The need to promote the use of renewable energy and renewable technologies in appropriate locations.
- Recognising the importance of open spaces, sport and recreation and the contribution that they make to enhancing quality of life.
- The prudent use of natural resources.
- The need to promote and protect the water environment including issues such as quality and resource use.
- The need to establish protocols and control development within areas at risk of flooding.
- The need to protect and enhance air quality.
- The need to promote community cohesion and to establish an area where individuals want to both live and work.
- The need to adapt to the threat posed by climate change.
- The need to protect and enhance biodiversity resources particularly sites of international importance e.g. Special Protection Areas (SPAs) and Ramsar Sites.
- The need for long-term sustainable patterns of development that provide for the economic and social needs of all populations.
- The need to reduce crime and fear of crime.
- The need to protect and enhance ecosystem functions and services.

- Raising levels of health and well-being and promoting greater levels of physical activity.
- Establishing a housing market that meets the needs of all residents.
- Promoting sustainable economic development and a range of employment opportunities that meet the needs of all sectors of the population and all skills levels.
- Promoting higher levels of design quality including improvements to energy efficiency.
- The need to raise the quality and improve the choice of learning opportunities and the importance of education and knowledge based industries.

2.3.13 The European Spatial Development Perspective identified a potential conflict that is likely to prevail in all countries, irrespective of their location and this concerns balancing the social and economic claims for spatial development with an area's ecological and cultural functions to ensure that the most sustainable patterns of development are achieved. Through the SA process and the inclusion of suitable sustainability objectives, indicators and targets, it should be possible to identify where potential issues and conflicts may arise and to develop suitable policy modifications and mitigation measures. The plans, programmes and environmental protection objectives that have been looked at in this review are included within Appendix A.

## The Sustainability Baseline and Key Sustainability Issues

2.3.14 Box 2 defines the SEA Directive requirements for this element of the process.

### Box 2: SEA Directive Requirements for Baseline Data Collation

*The SEA Directive requires that the SEA covers:*

*'the environmental characteristics of areas likely to be significantly affected' (Annex 1 (c))*

*'any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EC' (Annex 1 (d)).*

## Methodology

2.3.15 Characterising the environmental and sustainability baseline, issues and context helps to define the SA Framework. It involves the following key elements:

- Characterising the current state of the environment within the Ipswich area and immediate surroundings (including social and economic aspects as well as the natural environment); and
- Using this information to identify existing problems and opportunities which could be considered in the Core Strategy where relevant.

2.3.16 The environmental, social and economic baseline was characterised through the following methods:

- Review of relevant local, regional and national plans, strategies and programmes;
- Data research based around a series of baseline indicators developed from the SEA Directive topics (biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape). This included advice in *A Practical Guide to the Strategic Environmental Assessment Directive* from the ODPM, previous consultation recommendations from other SAs and the range of data available for the Borough. . Data has also been collated for additional socio-economic topic areas including

deprivation, housing and employment to ensure that a broad range of environmental, social and economic issues are considered.

2.3.17 A detailed description of the baseline characteristics of the Borough is provided in Appendix B.

### Key Sustainability Issues and Opportunities

2.3.18 The baseline data have been used to identify the key sustainability issues and opportunities in Ipswich. These will be updated as the baseline data are updated throughout the process. Although these have been grouped by broad sustainability theme, many are indirectly or directly linked and are therefore closely related.

**Table 2-2 Summary of Key Sustainability Issues and Opportunities in Ipswich**

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Population	<p>Ipswich has the highest population of all the boroughs within Suffolk.</p> <p>The level of projected population growth within Ipswich is relatively high and so a large number of new homes is considered necessary within Ipswich in order to meet the needs of all members of the population.</p> <p>There are potential challenges that could arise in the future relating to the type and tenure of housing provision on offer in the Borough. These issues include provision of homes for the elderly that meet needs such as accessibility, the provision of affordable homes, and the provision of smaller homes with one to two and two to three bedrooms.</p> <p>There is a high percentage of people under the age of 34 in Ipswich, which may have implications for provision of educational facilities, recreational facilities etc.</p> <p>Asian/Asian British are the main ethnic minority representing 6.3% of the population and therefore there needs to be appropriate services provision for all members of the population in terms of education, housing etc.</p>	<p>There are opportunities to improve the supply of housing, education, health and other community facilities within the Borough.</p>
Education and Qualifications	<p>Educational attainment across Ipswich is below the national average. However, the percentage of population holding recognised qualifications is average across Ipswich with numbers of those with no qualifications and achieving National Vocational Qualification (NVQ) Level 4 similar to regional and national averages.</p> <p>Gipping, Priory Heath, Whitehouse, Castle Hill, Stoke Park, Rushmere, Sprites and Gainsborough wards have LSOAs that fall within the 20% most deprived for education skills and training (ONS 2010 Indices of Multiple Deprivation).</p>	<p>There is a need to improve educational attainment in the Borough. By improving levels of educational attainment there could be wider social benefits and improvements to the local economy.</p>
Human Health	<p>Life expectancy from birth for males is slightly lower than the national average and life expectancy from birth for females is slightly higher than national averages. There is a need to reduce the incidence of diseases and health inequalities.</p> <p>Levels of teenage pregnancy are higher than regional and national levels and have implications for health service provision, housing and educational attainment.</p> <p>Alexandra, Westgate, Whitton, Gainsborough, Gipping and Stokes Park wards all have LSOAs within 20% of the most deprived for health deprivation and disability.</p>	<p>There are opportunities to improve the health of the Borough through the provision of new homes as there are links between the supply of decent housing and health.</p> <p>Health improvements would also benefit the local economy and would enhance overall quality of life in the Borough.</p> <p>There are opportunities to provide recreational facilities which could improve levels of physical fitness. Opportunities should also be sought to encourage walking and cycling.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Water	<p>The key watercourses in the Borough are the River Gipping and Belstead Brook which both flow into the River Orwell.</p> <p>The Environment Agency has identified a risk of flooding on land adjacent to the Rivers Orwell, Gipping, Belstead Brook and Westerfield Watercourse-</p> <p>The East of England is the driest part of the country and water supply is critically important, not only to agriculture but to some of the businesses currently located in Suffolk. Limited water availability and increasing demands means that much of the water resource in Suffolk is considered to be fully committed, if not overcommitted, to existing users (EA).</p> <p>Water quality is also a key sustainability issue. Most of the central and western area of Ipswich is designated as Source Protection Zone (SPZ) 2, with two smaller areas designated as SPZ1. SPZs are used to identify those areas close to drinking water sources, where the risk associated with groundwater contamination is greatest, and are important for identifying highly sensitive groundwater areas. SPZs are also recognised within the Environmental Permitting Regulations as a zone where certain development activities cannot take place.</p>	<p>New developments and households within the Borough should be encouraged to minimise water use and to re-use rainwater where possible i.e. grey water recycling systems. Discussions regarding water resources availability for new developments should be undertaken with Anglian Water.</p> <p>Areas at risk from flooding should be protected from development that would increase that risk. New development should be encouraged to use Sustainable Drainage Systems (SuDS) to manage runoff, further reduce flood risk and help protect groundwater and surface water quality.</p> <p>It should be ensured that groundwater quality is protected particularly during any construction works.</p>
Soil and Land Quality	<p>Much of Ipswich is an urban built up environment. The Northern Fringe area is located on Grade 2 Agricultural Land. This is considered to be the best and most versatile agricultural land.</p> <p>There is some known potentially contaminated land within the Borough.</p>	<p>Opportunities should be sought to include allotment space within the Borough where possible.</p> <p>Opportunities should be sought to remediate areas of contaminated land to ensure any contamination is suitably cleaned up and the site is safe for its end use.</p>
Air Quality	<p>There are four Air Quality Management Areas (AQMAs) within the Ipswich Borough, all of which are designated for NO<sub>2</sub> exceedences. All of the AQMAs are located within central Ipswich.</p>	<p>Opportunities should be sought to promote the use of public transport, walking and cycling.</p> <p>The air quality impacts of additional traffic within Ipswich and on the AQMAs must be assessed and monitored and strategies for limiting adverse impacts on air quality identified.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Climatic Factors	<p>A number of areas within Ipswich lie within the floodplain. Largely these areas are associated with the River Gipping and River Orwell. There are also smaller watercourses at risk of flooding – Westerfield Watercourse and Belstead Brook.</p> <p>There are areas at risk of flooding, some from tidal surges and some from heavy rain. This risk may continue to grow as a result of rising sea levels and increasingly heavy rainstorms that can overwhelm drainage systems and cause localised flooding unless mitigation measures are implemented.</p> <p>The Ipswich Flood Defence Management Strategy is a major scheme to reduce flood risk to Ipswich over the coming years. The strategy was approved in March 2006 and recommends an investment in new flood defences across Ipswich to significantly reduce flood risk to over 3,000 residential properties. Half of the projects of the scheme have been completed with an expected date to deliver the final Tidal Barrier Project in 2018 (Environment Agency).</p>	<p>New development should be encouraged to use SuDS to manage runoff and further reduce flood risk (particularly as some new development would be situated on previously undeveloped land). Delivery of the Ipswich tidal flood defences will also help to reduce flood risk.</p> <p>New developments should be encouraged to include sustainable design principles, energy efficiency and the incorporation of renewables e.g. the inclusion of solar panels and low carbon technologies. The carbon footprint of new development should be reduced.</p>
Biodiversity, Flora and Fauna	<p>There are three Sites of Special Scientific Interest (SSSI), one Special Protection Area (SPA), one Ramsar site, six Local Nature Reserves (LNR) and 19 County Wildlife Sites (CWS) within Ipswich (See Map 1 Sites of Ecological Importance).</p> <p>There is one area of ancient and semi-natural woodland along with ancient replanted woodland to the south of the Borough.</p>	<p>Development proposals should maximise opportunities to protect and enhance habitats and where appropriate create new habitats in order to deliver the biodiversity objectives of the relevant Biodiversity Action Plans (BAPs).</p> <p>Opportunities should be sought to develop and enhance the network of public open space.</p>
Cultural Heritage	<p>Ipswich is home to a wealth of heritage assets including those of a national and local importance.</p> <p>There are over 600 Listed Buildings, of which 11 are Grade I and 25 are Grade II*. There are ten Scheduled Ancient Monuments and 14 Conservation Areas (See Map 2 Cultural Heritage Assets).</p> <p>Several sites within Ipswich are listed on the Sites and Monuments Record.</p>	<p>It is important to ensure that the cultural heritage is protected and that cultural heritage issues are taken into consideration.</p> <p>Cultural heritage features should be conserved and enhanced.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Landscape/ Townscape	<p>The majority of Ipswich's' landscape typology is urban with some areas in the north located within ancient rolling farmlands and areas in the south east located within ancient rolling farmlands and rolling estate sandlands.</p> <p>The town centre has changed significantly during the twentieth century and although many historic buildings were lost to make way of new developments, it is a designated Conservation Area with historic and archaeological significance.</p> <p>In Ipswich there are over 600 Listed Buildings, of which 11 are Grade I and 31 are Grade II* (Ipswich Borough Council, Listed Buildings in Ipswich). Listed Buildings are largely concentrated within the town centre.</p>	<p>It is essential that landscape and townscape character and quality is enhanced through high quality design, careful siting, the incorporation of soft landscaping and attention to boundary treatments.</p> <p>In addition it is important to maintain the gap between Ipswich and adjacent villages to preserve local distinctiveness.</p> <p>Opportunities should be sought to promote local character and distinctiveness where possible to encourage new residents.</p>
Minerals and Waste	<p>There are a number of waste facilities within the Borough, including, a household waste and recycling centre, a composting site and facilities for metal / end of life vehicles (not inclusive). In addition, an energy from waste incinerator is under construction at Great Blakenham (Masons Quarry) which lies approximately 3km north of the Borough boundary, therefore transport implications must be managed carefully.</p> <p>Although 42% of household waste produced in Ipswich is being sent for reuse, recycling or composting instead of to landfill, this is lower than the figure for Suffolk (53.8%).</p>	<p>Opportunities should be sought to enhance recycling and composting performance.</p> <p>Sustainable sourcing and waste management principles should be promoted for all new development within Ipswich.</p>
Transportation	<p>The Borough is well connected by transport infrastructure and public transport links. The Ipswich Local Transport Plan includes a series of key priorities addressing transport and accessibility which include encouraging the provision and use of an integrated effective transport system which maximises the use of public transport, walking and cycling and reduces the overall impact of travel on the environment.</p>	<p>Opportunities should be sought to reduce dependence on the private car and increase public transport use.</p> <p>It will be important to ensure that new development can be easily accessed by public transport.</p> <p>It will be important to manage the additional travel demands that growth will generate and guide as many journeys as possible to sustainable modes for the good of the environment, economy and human health.</p> <p>The cycling and walking network within the Borough should be expanded and enhanced.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Economy	<p>Ipswich has a strong employment base for businesses with a slightly higher proportion than the Suffolk average of the population at the working age, but it also has a relatively high proportion of people who are economically inactive. Employment in Ipswich exceeds the national profile in the finance, IT, transport, communications, and public administration education and health sectors. It is below the national profile in manufacturing.</p> <p>Ipswich has lower working age skills levels, especially at degree level (22.8%), than the county as a whole (24.4%). It is even further below the regional and national levels (29.9%) (State of Ipswich Report May 2011). A lower than average proportion of Ipswich's population are classified as managers or senior officials while caring, leisure and other service occupations along with sales and customer service occupations and process plant and machine operatives are higher than regional and national averages.</p> <p>The Job Seekers Allowance rate in Ipswich (2011) is high compared to Suffolk and the national figures. It is particularly high for males, between the ages of 25-49 who have been unemployed for 6-months or over.</p> <p>The gross weekly pay for employees in Ipswich is lower than national and regional averages and the Borough has higher numbers of people claiming benefits than county and national indicators suggest (2010).</p> <p>The factors restricting economic growth in Suffolk in general are a lack of qualified staff and poor broadband; as well as a lack of customers, transport links, and poor quality premises (Suffolk Growth Strategy).</p>	<p>The economy in Ipswich needs to be diversified to broaden the economic base.</p> <p>The good transport links in the Borough should be exploited as accessibility is a key issue when encouraging new residents.</p> <p>There is a need to retain skilled workers and improve skills levels amongst the workforce.</p> <p>There are opportunities to attract private sector interest in the town to service and provide more opportunities for existing and new communities, such as more and better shops to enhance the high street, and a focus on stalled developments.</p>
Deprivation and Living Environment	<p>Gainsborough, Whitton, Whitehouse, Gipping, Stoke Park, Priory Heath, Bridge and Alexander wards all have LSOAs in the bottom 20% most deprived nationally (Index of Multiple Deprivation).</p> <p>Deprivation is a very complex issue and a number of different issues will need to be addressed for noticeable improvements to be realised.</p> <p>30% of all the crime in Suffolk happens in Ipswich and 10% of all the crime in Suffolk happens in the Town Centre of Ipswich as a result of the night time economy. Ipswich also has the highest prevalence of organised crime in Suffolk including people trafficking, drug dealing and prostitution. Anti-social behaviour also forms a large percentage of crime incidents in Ipswich in June 2012.</p>	<p>There is a need to tackle anti-social behaviour, and crime rates should be further reduced to enhance overall quality of life in Ipswich. This could be achieved through incorporating safety by design principles into new development and ensuring appropriate housing mixes are adopted. In addition, generally providing improved employment and educational opportunities for the local population could also contribute to improve crime rates.</p> <p>Access to sports facilities should be enhanced. This could have associated health benefits.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Housing	<p>Housing costs are relatively low but have gradually increased in recent years.</p> <p>Median house price (July 2013) in Ipswich is £150,000, which shows an increase of 7.1% from the median price of the same time the previous year (£140,000). The average house price is lower than Suffolk (£167,000 in July 2013) and lower than that in the East of England (£178,000 August 2013 – ONS). House prices have gradually increased but incomes have not matched this rate of growth, which may lead to problems of housing affordability.</p> <p>The affordability of purchased homes in 2011 was a ratio of 5:7 which was less than the affordability for Suffolk 6:9, the East of England 7:6 and England 6:5 (Office for National Statistics Local Profiles).</p> <p>During the period April 2011 – March 2012 283 dwellings net were completed, 54% of them were affordable homes (AMR 8 2011/2012). The longer-term affordable housing delivery average as a percentage of total housing completions for 2001-12 is 22%. The number of people presenting themselves as homeless increased 2012-11 to 2012-13.</p> <p>The Council's adopted Core Strategy sets a target to allocate land to accommodate at least 14,000 additional residential units between 2001 and 2021 (700 dwellings p.a.). Housing delivery has averaged 653 p.a. April 2001 to March 2012. Completions peaked in 2007-08 but have fallen since then in line with the downturn and subsequent recession.</p> <p>The Strategic Housing Marketing Assessment 2008 which has further been updated in 2012 found there is a need for smaller one to two bedroomed homes in Ipswich to meet the needs of smaller households and an ageing population, as well as a continued need for smaller two to three bedroomed family homes. Much of recent housing development in Ipswich, however, has been in the form of one and two bedroomed apartments and in the present economic climate there is an oversupply of flats.</p>	<p>Housing regeneration efforts present a significant opportunity both to revitalise the housing stock, address deprivation and to improve quality of life.</p> <p>Development within the Borough provides opportunities to meet housing needs, particularly for family housing and to counter balance the provision of flats within Ipswich town centre.</p>

## The SA Framework

### Background to the SA Framework

- 2.3.19 The SA Framework underpins the assessment methodology and comprises a series of Sustainability Objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. Whilst the SEA Directive does not require the use of Sustainability Objectives, they are a recognised tool for undertaking the assessment and are aspirations/goals that an authority/organisation should work towards achieving.
- 2.3.20 The Sustainability Objectives are separate from the DPD Objectives, although there may be some overlaps between them. The following section provides further details about the development of the SA Framework.

### Development of the Sustainability Objectives

- 2.3.21 The Sustainability Objectives have been developed using the review of other relevant plans, programmes and environmental objectives, the baseline data and the key issues and opportunities. They were originally agreed in 2006 during the initial SA Scoping for Ipswich's Core Strategy and subsequently the SA of Ipswich's now adopted Core Strategy DPD. Twenty two SA objectives were identified and the assessment showed that their compatibility with the twelve plan objectives was high with every sustainability objective having at least one plan objective positively compatible.
- 2.3.22 The SA Objectives have since been reviewed and have been slightly modified to reflect the requirements of the Focused Review Core Strategy DPD. SA Objectives ET8 and ET11 were merged, so that there are now twenty one SA Objectives.
- 2.3.23 Table 2-3 presents the SA Objectives that were used in the assessment of the DPD and its options. Each of the Sustainability Objectives is supported by a series of SA Sub-Objectives and indicators to add further clarity and to assist the assessment process. As the SA process progresses, indicators and where appropriate, targets were developed to assist the assessment.

**Table 2-3 The SA Framework**

SA Objective			SA Indicator	Source
ET1	To improve air quality	<ul style="list-style-type: none"> <li>▪ Would the policy contribute to the protection and improvement of local air quality?</li> <li>▪ Would the policy contribute to the impact of traffic congestion on air quality?</li> </ul>	<p>ET1a. Number and distribution of AQMAs</p> <p>ET1b. Exceedances of the annual average objective level for Nitrogen Dioxide in the AQMAs</p>	<p>Air Quality Archive</p> <p>Ipswich Borough Council</p>
ET2	To conserve soil resources and quality	<ul style="list-style-type: none"> <li>▪ Would any new developments protect the land within the Borough from new contamination and exposure to existing contaminated land?</li> <li>▪ Would new developments help to maintain and enhance soil quality where possible?</li> </ul>	<p>ET2a. Area of contaminated land returned to beneficial use</p> <p>ET2b. Density of new development</p> <p>ET2c. Amount (ha) of previously developed land available</p>	<p>Ipswich Borough Council</p> <p>Office for National Statistics (ONS)</p> <p>Department for Communities and Local Government</p>
ET3	To reduce waste	<ul style="list-style-type: none"> <li>▪ Would the implementation of the policy increase the proportion of waste recycling and re-use?</li> <li>▪ Would the implementation of the policy reduce the production of waste per capita?</li> <li>▪ Would the implementation of the policies result in reduction of the proportion of waste landfilled?</li> <li>▪ Would new developments encourage a reduced demand for raw materials?</li> <li>▪ Would new developments promote the use of recycled and secondary materials in construction?</li> </ul>	<p>ET3a. Tonnage of household waste produced and recycled</p> <p>ET3b. Location and number of waste facilities serving the Borough</p> <p>ET3c. Amount of household waste collected per household</p>	<p>Defra</p> <p>Suffolk County Council</p>

SA Objective			SA Indicator	Source
ET4	To reduce the effects of traffic upon the environment	<ul style="list-style-type: none"> <li>▪ Would the policy ensure that public transport services meet people's needs i.e. through new bus services?</li> <li>▪ Would the policy ensure that highways infrastructure meets people's needs (including walking and cycling routes)?</li> <li>▪ Would new developments promote the use of sustainable travel modes and reduce dependence on the private car?</li> </ul>	<p>ET4a. Traffic volumes, access to local services and journeys taken by sustainable modes</p> <p>ET4b. Journey to work by mode</p>	Ipswich Borough Council 2001 and 2011 Census
ET5	To improve access to key services for all sectors of the population	<ul style="list-style-type: none"> <li>▪ Would new development maintain and improve access to essential services and facilities?</li> <li>▪ Would new development improve access to open space?</li> </ul>	<p>ET5a. Proportion of new developments with access to key services by walking, cycling and public transport</p> <p>ET5b. Number of LSOAs with wards in bottom 10% of most deprived in terms of barriers to housing and services provision</p>	Ipswich Borough Council <a href="http://www.communities.gov.uk">www.communities.gov.uk</a>
ET6	To limit and adapt to climate change	<ul style="list-style-type: none"> <li>▪ Would new developments contribute to a reduction in greenhouse gas emissions?</li> <li>▪ Would new developments require the inclusion of SuDS?</li> <li>▪ Would new developments reduce the demand for energy and increase energy efficiency?</li> <li>▪ Would new developments increase the use of renewable energy?</li> <li>▪ Would the policy contribute to a reduction in CO<sub>2</sub> emissions from the transport sector?</li> <li>▪ Would new developments reduce and manage flooding?</li> </ul>	<p>ET6a. Total CO<sub>2</sub> emissions for the Borough</p> <p>ET6b. Annual average domestic gas and electricity consumption</p> <p>ET6c. Provision of shading and greening (i.e. avoiding the heat island effect)</p>	ONS Department for Energy and Climate Change (DECC) Ipswich Borough Council

SA Objective			SA Indicator	Source
ET7	To protect and enhance the quality of water features and resources and reduce the risk of flooding	<ul style="list-style-type: none"> <li>▪ Would the policy ensure the protection and enhancement of ground and surface water quality?</li> <li>▪ Would the policy encourage sustainable use of water resources?</li> <li>▪ Would the policy encourage the inclusion of flood mitigation measures such as SuDS?</li> <li>▪ Would new developments reduce and manage flooding?</li> </ul>	<p>ET7a. Water quality in rivers and groundwater quality</p> <p>ET7b. Daily domestic water use (per capita consumption, litres)</p> <p>ET7c. Number of planning applications granted permission contrary to Environment Agency advice</p>	<p>The Environment Agency</p> <p>Suffolk County Council</p> <p>Ipswich Borough Council</p>
ET8	To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	<ul style="list-style-type: none"> <li>▪ Would the policy protect and enhance designated sites of nature conservation importance?</li> <li>▪ Would the policy protect and enhance wildlife especially rare and endangered species?</li> <li>▪ Would new developments protect and enhance habitats and wildlife corridors?</li> <li>▪ Would new developments provide opportunities for people to access wildlife and open green spaces?</li> <li>▪ Would new development protect and enhance geodiversity?</li> </ul>	<p>ET8a. Area (ha) of woodland</p> <p>ET8b. Extent and condition of key habitats for which Biodiversity Action Plans have been established</p> <p>ET8c. Number and distribution of designated sites including SPAs, Ramsar sites, Sites of Special Scientific Interest, National Nature Reserves, Local Nature Reserves and County Wildlife Sites and Regionally Importance Geodiversity Sites in Ipswich</p> <p>ET8d. Percentage of designated sites in favourable condition</p>	<p><a href="http://www.magic.gov.uk">www.magic.gov.uk</a></p> <p>Suffolk Biodiversity Action Plan</p> <p>Natural England</p> <p>GeoSuffolk website</p> <p>SBRC</p>
ET9	To conserve and enhance the historic environment, heritage assets and their settings	<ul style="list-style-type: none"> <li>▪ Would the policy protect and enhance historic buildings and sites and their setting?</li> <li>▪ Would the policy contribute to the protection and enhancement of historic landscape / townscape value?</li> </ul>	<p>ET9a. Number of heritage assets 'at risk'</p> <p>ET9b. Planning permissions adversely affecting known or potential designated assets (historic buildings, archaeological sites etc.)</p>	<p>English Heritage</p> <p>Ipswich Borough Council</p>

SA Objective			SA Indicator	Source
ET10	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	<ul style="list-style-type: none"> <li>▪ Would new developments protect and enhance landscape character and quality?</li> <li>▪ Would new developments protect and enhance townscape character and quality?</li> <li>▪ Would new developments promote sensitive design in development?</li> <li>▪ Would new developments promote local distinctiveness?</li> </ul>	ET10a. Percentage of new housing completions achieving design standards such as Building for Life and Lifetime Homes	Ipswich Borough Council
HW1	To improve the health of those most in need	<ul style="list-style-type: none"> <li>▪ Would the implementation of the policy improve access to health and social care services?</li> <li>▪ Would the policy contribute to a reduction in health inequalities amongst different groups in the community?</li> <li>▪ Would new developments promote healthy lifestyles?</li> </ul>	<p>HW1a. Proportion of population with access to hospital / GP / Dentist</p> <p>HW1b. Proportion of journeys to work by foot or by bicycle</p> <p>HW1c. How children travel to school (Quality of Life Indicators (Government indicators) / Best Value Performance Indicators (Ipswich Borough Council))</p>	Ipswich Borough Council 2001 and 2011 Census ONS
HW2	To improve the quality of life where people live and encourage community participation	<ul style="list-style-type: none"> <li>▪ Would new development encourage community participation?</li> <li>▪ Would new development protect residential amenity from pollution?</li> <li>▪ Would new developments minimise noise and light pollution?</li> </ul>	<p>HW2a. Play and open space quality, quantity and accessibility</p> <p>HW2b. Percentage of residents who are happy with their neighbourhood as a place to live (Place Survey)</p> <p>HW2c. Number of noise and light pollution complaints</p>	Ipswich Borough Council Department for Communities and Local Government
ER1	To reduce poverty and social exclusion	<ul style="list-style-type: none"> <li>▪ Would the policy contribute to reduced overall levels of deprivation?</li> </ul>	<p>ER1a. Proportion of population who live in wards that rank within the 10% most deprived in the country</p> <p>ER1b. Provision of childcare</p>	<a href="http://www.communities.gov.uk">www.communities.gov.uk</a> Ipswich Borough Council / Suffolk County Council

SA Objective			SA Indicator	Source
ER2	To offer everybody the opportunity for rewarding and satisfying employment	<ul style="list-style-type: none"> <li>▪ Would the policy contribute to a reduction in unemployment in the areas most at need?</li> <li>▪ Would new developments improve physical accessibility to jobs for those in greatest need?</li> <li>▪ Would the policy ensure people are educated, trained and skilled to meet local economic needs?</li> <li>▪ Would the policy ensure labour supply meets local economic needs?</li> </ul>	<p>ER2a. Working age unemployment</p> <p>ER2b. Employment by occupation</p> <p>ER2c. Youth unemployment data</p>	<p>ONS / National Online Manpower Information System (NOMIS)</p> <p>Ipswich Borough Council</p> <p><a href="http://www.communities.gov.uk">www.communities.gov.uk</a></p>
ER3	To help meet the housing requirements for the whole community	<ul style="list-style-type: none"> <li>▪ Would the policy ensure that there is sufficient housing to meet identified needs in all areas?</li> <li>▪ Would new developments ensure that housing meets acceptable standards?</li> <li>▪ Would new developments increase the availability of affordable housing?</li> </ul>	<p>ER3a. Number of new dwellings completed in Ipswich including affordable housing</p> <p>ER3b. Percentage split of dwelling types</p> <p>ER3c. Average house price</p> <p>ER3d. Number of people presenting themselves as homeless.</p>	<p>Suffolk Observatory</p> <p>ONS</p> <p>Ipswich Borough Council</p>
ER4	To achieve sustainable levels of prosperity and economic growth throughout the plan area	<ul style="list-style-type: none"> <li>▪ Would the policy encourage new business formation?</li> <li>▪ Would the policy increase and diversify employment opportunities?</li> <li>▪ Would the policy encourage economic growth?</li> <li>▪ Would the policy ensure sufficient land, buildings and premises are available to accommodate business start-up and growth?</li> <li>▪ Would the policy ensure Infrastructure (including transportation) meets the needs of business?</li> </ul>	<p>ER4a. Planning consents for employment uses</p> <p>ER4b Take up of employment land</p> <p>ER4c Population in Employment</p>	<p>Ipswich Borough Council (Monitoring reports)</p> <p>ONS – Nomis</p> <p><a href="http://www.nomisweb.co.uk">www.nomisweb.co.uk</a></p>

SA Objective			SA Indicator	Source
ER5	To support vital and viable town, district and local centres	<ul style="list-style-type: none"> <li>▪ Would new developments maintain and improve access to shops, services and facilities in centres?</li> <li>▪ Would new developments ensure a mix of retail units in centres?</li> </ul>	ER5a. No. / Percentage of vacant retail units ER5b. Commercial / retail rental data ER5c Percentage of new retail floorspace developed within defined centres.	Ipswich Borough Council <a href="http://www.communities.gov.uk">www.communities.gov.uk</a>
ER6	To encourage efficient patterns of movement in support of economic growth	<ul style="list-style-type: none"> <li>▪ Would the policy ensure sufficient land, buildings and premises are available to accommodate business start-up and growth?</li> <li>▪ Would the policy ensure Infrastructure (including transportation) meets the needs of business?</li> <li>▪ Would the policy ensure that public transport services meet people's needs i.e. through new bus services?</li> <li>▪ Would the policy ensure that highways infrastructure meets people's needs (including walking and cycling routes)?</li> <li>▪ Would the policy promote the use of sustainable travel modes and reduce dependence on the private car?</li> <li>▪ Would the policy reduce the impact of traffic on the economy?</li> </ul>	ER6a No. / percentage of people working from home ER6b Waiting times at junctions in Ipswich See also ET4a (employment land take up) and HW1b (journey to work)	Ipswich Borough Council Suffolk County Council

SA Objective			SA Indicator	Source
ER7	To encourage and accommodate both indigenous and inward investment	<ul style="list-style-type: none"> <li>▪ Would the policy encourage inward investment and new business formation?</li> <li>▪ Would the policy support the preservation and / or development of a high quality built environment?</li> <li>▪ Would the policy promote the development of multi-functional green infrastructure in urban areas?</li> <li>▪ Would the policy enhance the reputation of urban areas as places to live, work and visit?</li> </ul>	<p>ER7a. Business start-ups and closures</p> <p>ER7b. No. of business enquiries to Ipswich Borough Council / Suffolk County Council by types and size of site</p> <p>ER7c. Employment land availability</p>	<p>Ipswich Borough Council</p> <p>Suffolk County Council</p>
CL1	To maintain and improve access to education and skills for both young people and adults	<ul style="list-style-type: none"> <li>▪ Would new development increase levels of participation and attainment in education for all members of society?</li> <li>▪ Would new development improve access to and involvement in lifelong learning opportunities?</li> <li>▪ Would new developments improve the provision of education and training facilities?</li> </ul>	<p>CL1a. GCSE Attainment Levels (Grades A*-C)</p> <p>CL1b. Proportion of the population with no qualifications</p>	<p>ONS</p> <p><a href="http://www.communities.gov.uk">www.communities.gov.uk</a></p>
CD1	To minimise potential opportunities for crime and anti-social activity	<ul style="list-style-type: none"> <li>▪ Would the policy contribute to a reduction in crime levels?</li> <li>▪ Would the policy contribute to a reduction in the fear of crime?</li> <li>▪ Would the policy contribute to a reduction in levels of anti-social behaviour?</li> <li>▪ Would new developments encourage safety by design?</li> </ul>	<p>CD1a. Recorded crime per 1,000 population</p> <p>CD1b. Burglary Rate</p> <p>CD1c. Fear of Crime (Quality of Life, Suffolk Speaks, British Crime Survey)</p> <p>CD1d. Number of domestic noise complaints</p>	<p>ONS</p> <p><a href="http://www.communities.gov.uk">www.communities.gov.uk</a></p> <p>Ipswich Borough Council</p>

## SA Objective Compatibility

- 2.3.24 The 21 SA Objectives have been tested against each other to identify any potential areas of internal incompatibility. The results are presented in Table 2-4 and summarised below.
- 2.3.25 Generally the SA Objectives were either compatible or no clear impacts between the objectives could be established. However, some uncertainties were identified. Compatibility was assessed as uncertain between SA Objective ER3 'To help meet the housing requirements for the whole community' and the following SA Objectives:
- ET1: 'To improve air quality'
  - ET2: 'To conserve soil resources and quality'
  - ET3: 'To reduce waste'
  - ET4: 'To reduce the effects of traffic upon the environment'
  - ET6: 'To limit and adapt to climate change'
  - ET7: 'To protect and enhance the quality of water features and resources and reduce the risk of flooding'
  - ET8: 'To conserve and enhance biodiversity and geodiversity including favourable conditions on SSSIs, SPAs and SACs'
  - ET9: 'To conserve and where appropriate enhance areas and sites of historical importance'
  - ET10: 'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes'
- 2.3.26 Uncertainty was identified because new residential development has the potential to adversely affect biodiversity resources through direct land take, landscape and heritage resources through inappropriate siting and water resources through an increase in water demand / consumption. In addition, new residential development would also require the use of natural resources, raw materials and energy, and would increase pressure upon current waste management.
- 2.3.27 There could also be an increase of traffic during the construction / operation of new residential development associated with an increase of inhabitants and their future transport requirements therefore this could affect local air quality and climate change.
- 2.3.28 However, some of these uncertainties could be addressed through the DPD, by requiring developments to meet Code for Sustainable Homes standards, promoting sustainable travel, and including measures to protect and enhance biodiversity.

The following notations are used in Table 2-4:

Objectives are compatible	= +	No clear impact on each other	= 0
Mutually incompatible	= -	Compatibility unknown	= ?

Table 2-4 Internal Compatibility of SA Objectives

	ET1	ET2	ET3	ET4	ET5	ET6	ET7	ET8	ET9	ET10	HW1	HW 2	ER1	ER2	ER3	ER4	ER5	ER6	ER7	CL1	CD1	
ET1																						
ET2	0																					
ET3	+	+																				
ET4	+	+	0																			
ET5	+	?	0	+																		
ET6	+	+	+	+	?																	
ET7	0	+	+	+	0	+																
ET8	+	+	+	+	0	+	+															
ET9	0	0	0	0	0	0	0	+														
ET10	+	+	+	+	0	+	+	+	+													
HW1	+	0	0	0	+	0	0	0	0	0												
HW2	0	0	+	+	+	0	+	+	+	+	+											
ER1	0	0	0	0	+	0	0	+	+	+	+	+										
ER2	0	0	0	0	+	0	0	0	0	0	0	0	+									
ER3	?	?	?	?	0	?	?	?	?	?	0	+	+	+								
ER4	0	0	0	0	+	0	0	0	0	0	0	+	+	+	+							
ER5	0	0	0	0	+	0	0	0	+	0	0	+	+	+	+	+						
ER6	+	+	0	0	+	+	0	+	0	0	0	+	+	+	+	+	+					
ER7	0	0	0	+	+	+	+	0	0	0	0	0	+	+	+	+	0	+				
CL1	0	0	0	+	+	0	0	0	0	0	0	+	+	0	+	+	0	0	0			
CD1	0	0	0	0	+	0	0	0	0	0	0	+	+	+	0	+	+	0	0	0	+	

## SA Scoping Report

2.3.29 The SA process commenced in 2013 with the preparation of an SA Scoping Report for the Core Strategy Focused Review and the Site Allocations DPD (Hyder Report Reference: 5001-UA006314-UE31-01). The Scoping Report was in two parts – Part One covered the Core Strategy and Part Two, the Site Allocations DPD. For Part One, the Scoping Report contained:

- Characterisation of the environmental, social and economic baseline within the Ipswich area;
- A review of relevant plans, programmes and environmental protection objectives that could influence the SA and the development of the Core Strategy;
- Identification of key sustainability issues and opportunities, together with recommendations for mitigation where required; and
- Review of the SA Framework against which the policy changes of the Core Strategy have been assessed.

## Geographical Scope of the Appraisal

2.3.30 The Scoping Report set out the scope and approach to the assessment of the Core Strategy Focused Review. The geographical scope of the SA has been driven by the geographical scope of the DPD. The Core Strategy will apply to the whole of the Borough. The SA therefore considered the spatial extent of its likely impacts. In some cases this may be only within the Borough, but in other cases the impacts of the policy may be felt over a wider area including potentially outside the Borough (i.e. in adjacent districts - Suffolk Coastal, Babergh and Mid Suffolk Local Authorities). Similarly, the cumulative effects of the policies may result in impacts occurring over a wider area (i.e. in-combination with other development across the Borough). This was also considered in the SA.

## Temporal Scope of the Appraisal

2.3.31 The Reviewed Core Strategy sets out the framework for facilitating the determination of future planning applications within the Ipswich area until 2031.

## Topics Covered in the Appraisal

2.3.32 The SA comprises the consideration of the environmental, social and economic effects of the policies that have changed in the Core Strategy. The baseline characterisation has therefore reflected the topics set out in the SEA Directive, but also considers relevant additional social and economic topics as recommended in the PAS SA guidance. Table 2-5 identifies the topics covered, together with their relationship with the topics listed in Annex I of the SEA Directive.

Table 2-5 Topics Covered in the SA and Relevant SEA Directive Topics

Topics covered in the SA	Relevant topics listed in Annex I of the SEA Directive
Population	Population and Human Health Material Assets
Education and Qualifications	Material Assets
Health	Population and Human Health Material Assets
Crime	Population and Human Health
Water	Water and Soil
Soil and Land Quality	Water and Soil Material Assets
Air Quality	Air
Energy and Climate Change	Climatic Factors
Biodiversity, Flora and Fauna	Biodiversity, Flora and Fauna
Cultural Heritage	Cultural heritage and landscape
Landscape	Cultural heritage and landscape
Minerals and Waste	Material Assets
Transportation	Material Assets
Economy	Material Assets
Deprivation and Living Environment	Population and Human Health Material Assets
Housing	Material Assets

2.3.33 Annex I of the SEA Directive also requires an assessment of secondary, cumulative and synergistic effects, the results of which are provided in Chapter 4. Transboundary impacts on neighbouring authorities are considered inherently throughout the assessment.

### Aspects of the DPD assessed and methodology

2.3.34 The Draft Core Strategy Focused Review focuses on housing and employment. The principal material changes will be to CS7 housing figures, CS10 Ipswich Northern Fringe, CS13 job figures, CS14 retail figures and CS17 infrastructure. There will be minor changes to many more policies but no policies are being deleted or new ones added.

2.3.35 An initial sieve analysis of all the policies was undertaken to identify which policies only had minor changes and would therefore require no further assessment, since the findings of the previous SA had not changed. Policies where significant changes had been made were assessed further in this SA. The policies sieve table is included in Appendix C.

2.3.36 The sieve analysis used the Council's assessment as a starting point and the table was submitted to the Council for their comments before commencing the assessments.

2.3.37 The intention was to ensure that the process is iterative with regular feedback occurring between the plan-makers and the SA team as policies are developed.

2.3.38 All detailed matrices were supplemented with information relating to phasing and proposed delivery mechanisms. The detailed matrices determined significant impacts derived from the following:

- Impact – whether the impact will be positive, negative or neutral when assessed against the SA Objectives.
  - Temporal scale – whether the impact will be short-term (within 5 years), occur in the medium term (5 – 10 years) or occur in the long-term (10 years +).
  - Spatial scale – whether the impact will be realised a local level or a Borough wide level. Any transboundary effects outside of the study area would also be considered.
  - Permanency – whether effects will be permanent or temporary.
  - Level of uncertainty – the level of uncertainty in the prediction will be classified as low, medium or high.
- 2.3.39 The assessment of the DPD also made use of Geographical Information Systems (GIS) to identify the relationship between the DPD and the existing environmental and sustainability features, for example designated sites or areas of socio-economic deprivation.
- 2.3.40 The assessment made good use of the baseline data, which was updated during the assessment process. When assessing each element, the questions asked included:
- To what extent does the policy meet the SA Framework Objectives?
  - To what extent will the policy seek to address sustainability problems?
  - To what extent will the policy affect the current sustainability baseline conditions?
- 2.3.41 In addition to assessing the policy individually, cumulative effects were also assessed. This considered how the changes in policies could result in cumulative impacts in-combination with other development across the Borough. This included the receptor topic of biodiversity for example at the Borough level, or specific ecological features or designations at the sub-Borough level.
- 2.3.42 Where negative impacts are identified, measures were proposed to offset, avoid or otherwise mitigate the impact. In addition, measures which may further enhance benefits were also identified, as appropriate.

## Consultation

- 2.3.43 The Scoping Report was issued for public consultation from 25<sup>th</sup> October to 28<sup>th</sup> November 2013, for a five week consultation period. It was issued to the three statutory consultees (the Environment Agency, English Heritage and Natural England) and key stakeholders through the report's availability on the council's website.
- 2.3.44 The aim of the scoping consultation was to obtain comment and feedback upon the scope and level of detail of the SA. The consultation comments have been considered and taken into account in the preparation of this Interim Report. Appendix D presents the comments from the scoping consultation.
- 2.3.45 This Interim Report is being issued for consultation from 13<sup>th</sup> January 10<sup>th</sup> March 2014. The consultation comments will inform the next stage of the development of the DPD.

## 2.4 Stage B: Developing and Refining Options and Assessing Effects

- 2.4.1 The development of the Core Strategy considered options relating to the Vision, Objectives, and policies to help guide the consenting of development proposals. An alternative options form was filled in for those revised policies in the Focused Review Core Strategy with major changes which are subject to sustainability appraisal of this report. The form set out the revised policy wording and describes the reasons for changing the policy. The revised policies were assessed against the SA Objectives and the matrix provides commentary and recommendations for

further development. Notations used in the assessment of the options and policies are presented in Table 2-6 below.

**Table 2-6 Notations used in the appraisals**

Major Positive Impact	The policy strongly supports the achievement of the SA Objective.	<b>++</b>
Positive Impact	The policy partially supports the achievement of the SA Objective.	<b>+</b>
Neutral/ No Impact	There is no clear relationship between the policy and / or the achievement of the SA Objective or the relationship is negligible.	<b>0</b>
Positive and negative outcomes	The policy has a combination of both positive and negative contributions to the achievement of the SA Objective, e.g. a short term negative impact but a longer term positive impact.	<b>+/-</b>
Uncertain outcome	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation at the local level. More information is required to assess the impacts.	<b>?</b>
Negative Impact	The policy partially detracts from the achievement of the SA Objective.	<b>-</b>
Major Negative Impact	The policy strongly detracts from the achievement of the SA Objective.	<b>--</b>

<b>L-T</b>	Effects likely to arise in 10-25 years of Core Strategy implementation
<b>M-T</b>	Effects likely to arise in 5-10 years of Core Strategy implementation
<b>S-T</b>	Effects likely to arise in 0-5 years of Core Strategy implementation
<b>D</b>	Direct effects.
<b>I</b>	Indirect effects.
<b>R</b>	Effects are reversible
<b>IR</b>	Effects are irreversible
<b>H/M/L</b>	High, medium or low certainty of prediction
<b>C</b>	Potential to have cumulative effect with other proposals or plans on this objective

## Assessing the Effects of the Changes to the Core Strategy Vision and Objectives

2.4.2 The Vision and Objectives have been reviewed to determine if there were any significant changes which would require a new assessment. The findings are set out in Section 4.2.

### Policies

2.4.3 The Draft Core Strategy Focused Review focuses on housing and employment. Policies where significant changes had been made were assessed further in this SA. The principal material changes were to CS7 housing figures, CS10 Ipswich Northern Fringe, CS13 job figures, CS14 retail figures and CS17 infrastructure. There were minor changes to many more policies but no policies are being deleted or new ones added.

2.4.4 The policies that have changed have been assessed against the SA Objectives in order to determine the overall sustainability performance of the document. The following elements of the Core Strategy have been assessed:

- CS7 Amount of Housing Required
- CS10 Ipswich Northern Fringe
- CS13 Planning for Jobs Growth
- CS14 Retail Development
- CS17 Delivering Infrastructure

2.4.5 The detailed matrix determined significant impacts of each revised policy taking into consideration the nature of impact, temporal and spatial scale, permanency, and level of uncertainty (see Table 2-6).

2.4.6 The assessment made good use of the baseline data, which was updated during the assessment process. When assessing each element, the questions asked included:

- To what extent does the policy meet the SA Framework Objectives?
- To what extent will the policy seek to address sustainability problems?
- To what extent will the policy affect the current sustainability baseline conditions?

## Appraisal of Cumulative and Synergistic Effects

2.4.7 In addition to assessing the policy individually, cumulative effects were also assessed. This considered how the changes in policies could result in cumulative impacts in-combination with other development across the Borough. This included the receptor topic of biodiversity for example at the Borough level, or specific ecological features or designations at the sub-Borough level.

The SEA Directive requires *inter alia* that cumulative effects should be considered. It stipulates consideration of “*the likely significant effects on the environment...*” and that “*These effects should include secondary, cumulative, synergistic...effects*” (Annex I). The Practical Guide sets out the following definitions for these terms:

- Secondary or indirect effects comprise effects which do not occur as a direct result of the proposed activities, but as a result of complex causal pathway (which may not be predictable).
- Cumulative effects arise from a combination of two or more effects, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan or programme have a combined effect.
- Synergistic effects – synergy occurs where the joint effect of two or more processes is greater than the sum of individual effects.

2.4.8 The potential for cumulative, synergistic or secondary or indirect effects as a result of the Focused Review Core Strategy has been inherently considered within the appraisal. The findings of which are presented in Section 4.4.

## Appraisal of Transboundary Effects

2.4.9 The SEA Directive also requires SAs to consider the transboundary effects of the plan on other EU member states. Potential effects from the implementation of the revised policies on neighbouring boroughs have been noted where appropriate throughout the assessment.

## Mitigation

- 2.4.10 Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the changes to the Core Strategy. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified.

## Technical Limitations and Uncertainties

- 2.4.11 During the assessment of the Core Strategy Focused Review, there has sometimes been uncertainty when predicting the potential effects. Where this has occurred, the uncertainty is identified within the appraisal matrices and accompanied by recommendations to mitigate such impacts.
- 2.4.12 In addition, a number of data gaps were identified within the baseline context where data is unavailable or out of date. Obtaining these datasets would help to further increase the knowledge of the areas, and could potentially be filled through the use of the monitoring framework.
- 2.4.13 Finally, the Core Strategy essentially acts as a guidance document for the future development of the Borough. There is therefore reliance upon future decision-makers to ensure sustainable development is ensured.

## 2.5 Stage C: Preparation of the SA Report

- 2.5.1 This Interim SA Report presents the findings of the re-assessments to-date including the information collated in Stage A and during scoping, and documents the SA process so far. The results of the appraisal together with any mitigation measures proposed are recorded in the remaining chapters of this document.

## 2.6 Stage D: Consultation on the Core Strategy Focused Review and the SA Report

- 2.6.1 The Scoping Report was issued for public consultation from 25<sup>th</sup> October to 28<sup>th</sup> November 2013, for a five week consultation period. It was issued to the three statutory consultees (the Environment Agency, English Heritage and Natural England) and key stakeholders through the report's availability on the council's website.
- 2.6.2 The aim of the scoping consultation was to obtain comment and feedback upon the scope and level of detail of the SA. The consultation comments have been considered and taken into account in the preparation of this Interim Report
- 2.6.3 This Interim SA Report has now been issued for informal consultation alongside the Core Strategy Focused Review to all key stakeholders (including statutory consultees and the public) for comment. The consultation period will run from the 13<sup>th</sup> January to 10<sup>th</sup> March 2014. Following the close of the consultation period, IBC will review the feedback and revise the plan as appropriate. If significant amendments are made to the document, the SA Report may also need to be updated to reflect the assessment of these amendments prior to the formal consultation.

## 3 APPRAISAL OF THE ALTERNATIVES

### 3.1 Appraisal of Alternatives (SA 2009)

- 3.1.1 The adopted Core Strategy 2011 lays out 53 policies, of which 33 are related to development control. The sustainability appraisal undertaken in 2009 assessed the alternative option of non-implementation of each policy. The policies and a “do nothing alternative” were assessed against the SA objectives listed in Table 2.3 using a scoring system to compare the overall performance against the SA objectives. Of the 53 policies, implementation of the policy outscored the “do nothing” option in 52 cases. The one Policy in which the alternative ‘do nothing’ option scored more highly is Policy CS7 – The Amount of New Housing.

### 3.2 Appraisal of Alternatives (Focused Review of Core Strategy)

- 3.2.1 The more detailed assessment of the adopted policy and the revised policy against the SA objectives is presented in Appendix E. Table 3-1 provides a summary of the sustainability appraisal as well as the reasons why the Council considered the changes in the revised policies. It also includes sustainability comments regarding the performance of the policies against the SA objectives.

**Table 3-1 Summary Appraisal of Policies and Alternatives**

Adopted Policy 2011	Revised Policy 2013	Reasons for changes	SA Comments
<p><b>CS7 The Amount of Housing Required</b></p> <p>The Regional Spatial Strategy gave the Council a target to allocate land to accommodate at least 15,400 additional residential units between 2001 and 2021. This is equivalent to 770 dwellings per year. However, the Council revised this figure to 700 dwellings per annum through the adopted Core Strategy (14,000 from 2001 to 2021) in the light of additional local evidence.</p> <p>Land supply for the years 2021 to 2027 is addressed principally by the Northern Fringe area.</p>	<p>The figure for the amount of housing required has been reduced to 13,550 dwellings, at 677 dwellings per annum between 2011 and 2031.</p> <p>Windfall sites will contribute to the land supply for housing.</p>	<p>The changes are based on updated population and household projection modelling work.</p> <p>The phasing of the housing sites is informed by the SHLAA and the figures of the land supply on PDL have been updated based on the availability of brownfield sites.</p> <p>The Northern Fringe area is considered for development at an earlier stage than foreseen in 2011 due to limited availability of brownfield sites within the borough.</p>	<p>The revised policy envisages the use of a greenfield land for housing supply throughout the duration of the plan rather than after 2021 as originally considered. Although the revised housing figures per annum suggest fewer residential dwellings to be built, the assessment shows that the revised policy performs well against SA objectives HW1 (health), HW2 (quality of life) and economic objectives (ER1, ER2, ER3, ER4). This is mostly due to the fact that the policy reflects the current housing needs of the borough and the housing growth is still substantial to attract further investment and create job opportunities.</p> <p>The revised policy is likely to have some negative effects on soil resources as it relies predominantly on greenfield land allocated at the Northern Fringe. However, windfall sites may provide opportunities to use PDL and reduce the impact on greenfield land use.</p> <p>Potential negative effects related to air quality, biodiversity, flood risk and crime could be mitigated and reduced in the long term by improved pedestrian and cycling infrastructure, the provision of public transport services, enhancement of open space and creation of habitats, the use of SuDS and safety by design principles policies.</p>
<p><b>CS10 Ipswich Northern Fringe</b></p> <p>Land at the Northern Fringe of Ipswich, north of Valley Road / Colchester Road and between Henley Road in the west and Tuddenham Road in the east, will form the main source of</p>	<p>In order to meet objectively assessed housing need, developing the whole Northern Fringe for approximately 3,500 dwellings is required throughout the duration of the plan. The Northern Fringe site consists of 195ha of land which will be developed as three neighbourhoods: a Northern neighbourhood (east of Henley</p>	<p>Land at the Northern Fringe of Ipswich will form a key component of the main source of supply of housing land in Ipswich during the plan period due to the limited availability of previously developed land within the borough and the need to meet objectively assessed</p>	<p>Same as above.</p> <p>In addition, the revised policy performs well against SA objectives ER4, ER6, and ER7 through the provision of community and education facilities, though encouraging sustainable modes of transport and increasing the attractiveness of the area for inward investment.</p>

Adopted Policy 2011	Revised Policy 2013	Reasons for changes	SA Comments
<p>supply of housing land in Ipswich after 2021.</p> <p>Due to the limited availability of previously developed land in the rest of the town, the delivery of 1,000 dwellings will be expected to commence prior to 2021 on land to the east of Henley Road and south of the railway line.</p> <p>The indicative capacity at the Northern Fringe identified in the SHLAA is about 4,500 dwellings.</p>	<p>Road and north of the railway line), a Southern neighbourhood (west of Westerfield Road and south of the railway line) and an Eastern neighbourhood (east of Westerfield Road).</p>	<p>housing need.</p>	<p>Negative effects from the revised policy are likely to occur with regards to air pollution due to increased traffic, loss of agricultural land, potential loss of habitats and waste generation. The revised policy performs better against SA objective ET6 (climate change) due to fewer residential dwellings being delivered in the long term hence reduced greenhouse emissions.</p> <p>Mitigation measures have the potential to reduce any negative effects through allocation of land for open space and parks, creation and enhancement of habitats where appropriate, and improved pedestrian and cycling infrastructure.</p>
<p><b>CS13 Planning for Jobs Growth</b></p> <p>The Council will promote sustainable economic growth in the Ipswich Policy Area. It will encourage the provision of at least 18,000 jobs between 2001 and 2025. In allocating sites for employment development, the Council will take account of the sectors projected to have the highest jobs growth between 2006 and 2026 as identified in the Suffolk Haven Gateway Employment Land Review (2009). These include construction; retail / hotels; distribution; finance and other business services; and public services.</p>	<p>The Council will promote sustainable economic growth in the Ipswich Policy Area, with a focus on the delivery of jobs within the Borough. It will encourage the provision of in the region of 12,500 jobs between 2011 and 2031.</p> <p>There is a wider range of sectors anticipated to have highest job growth and these include:</p> <ul style="list-style-type: none"> <li>▪ advanced manufacturing and technology;</li> <li>▪ energy;</li> <li>▪ information and communication technology;</li> <li>▪ finance and insurance;</li> <li>▪ food, drink and agriculture;</li> <li>▪ ports and logistics;</li> <li>▪ life sciences, biotechnology and bloodstock;</li> </ul>	<p>The jobs figure is lower than that previously identified to reflect more recent evidence from the East of England Forecasting Model in 2012 and covers the period 2011 to 2031. The previous figure was derived from an indicative target of 30,000 jobs for the Suffolk Haven Gateway area including Suffolk Coastal and Babergh District Councils between 2001 and 2021 as identified in the East of England Plan.</p>	<p>Although the job figure is lower than that previously identified, it reflects the most recent Forecasting Model in 2012. The revised policy includes a much wider range of growth sectors and the economic SA objectives are likely to be achieved through the allocation and protection of employment land and through the joint work with local partners to encourage sustainable growth. It is also anticipated that employment opportunities will have indirect positive effects on SA objectives ER1 and ER4 (poverty and sustainable growth) as the policy continues to encourage local partnerships and envisages allocation of land for education uses. Opportunities are identified to address issues related to contaminated land of brownfield sites.</p> <p>Alternative 1 (the adopted policy 2011) performs better than the revised policy with regards to SA objectives HW1 (health), ER7 (inward investment), and CL1 (education) due to more opportunities for employment and training and more land allocated for employment</p>

Adopted Policy 2011	Revised Policy 2013	Reasons for changes	SA Comments
	<ul style="list-style-type: none"> <li>▪ tourism;</li> <li>▪ creative and cultural industries.</li> </ul>		<p>use. Alternative 1 performs worse in the long term against the environmental SA objectives air quality, waste and climate change.</p> <p>Mitigation measures to reduce the negative effect would involve the use of sustainable modes of transport and reuse/recycling of materials.</p>
<p><b>CS14 Retail development</b></p> <p>Through the IP-One Area Action Plan, the Council will extend the Central Shopping Area to include the Westgate quarter and the land south of Crown Street and Old Foundry Road and allocate sites for retail development within it. This will enable the delivery of at least 35,000 sqm net of additional floorspace to diversify and improve the retail offer.</p>	<p>Through the Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD, the Council intends to extend the Central Shopping Area to include the Westgate quarter and allocate sites for retail development within it. This will enable the delivery in the region of 15,000 sqm net of additional floorspace to diversify and improve the retail offer. Further allocations will be made through the Site Allocations DPD review following a review of the Retail capacity study to address provision after 2026.</p>	<p>The reduction of the retail floorspace figure is considered as a result of the DTZ Opportunity Sites Study 2013 and more recent monitoring data in order to reflect the current needs of the borough and to avoid over supply of land for retail use.</p> <p>The revised policy allows more flexibility for further reassessment depending on the retail needs of the borough after 2026.</p>	<p>Although the retail floorspace has been significantly reduced, the revised policy still performs well against the economic SA objectives ER1 (poverty), ER2 (employment), ER4 (sustainable growth), ER5 (vital and viable town centres), and ER7 (inward investment). In addition, some benefits are identified with regards to the allocation of retail floorspace in easily accessible areas encouraging the use of sustainable modes of transport with some positive indirect effect on climate change (SA objectives ET4, ET5 and ET6). Air quality effects are likely to be worse if alternative 1 (adopted policy 2011) is implemented due to more traffic generation to and from Ipswich town centre on weekends and public holidays.</p>
<p><b>CS17 Delivering Infrastructure</b></p> <p>Ipswich Borough Council adopted a standard charge approach to the delivery of infrastructure. Affordable housing and on-site open space provision was dealt with through planning obligations.</p>	<p>Developer will contribute to the delivery of infrastructure through Section 106 Agreements or CIL.</p>	<p>Section 106 Agreements will secure only affordable housing, on-site infrastructure and specifically identified off-site infrastructure items that will not require the pooling of more than five obligations.</p> <p>The developers' contributions under CIL regulations will allow infrastructure improvements throughout the whole area of Ipswich rather than just within the vicinity of new developments.</p>	<p>The revised policy performs particularly well against SA objectives ET4 (traffic), ET5 (access), ET6 (climate change). It strongly supports objective ET7 (flood risk) through clear commitment to allocate contributions against flood defence works.</p> <p>In addition, it is considered that the revised policy provides more opportunities to contribute to the achievement ET8 objective due to increased potential to distribute contributions across the whole borough and cover a much wider area.</p> <p>Indirect positive effects are likely to occur with regards to economic objectives ER1 (poverty) and ER4</p>

Adopted Policy 2011	Revised Policy 2013	Reasons for changes	SA Comments
			(sustainable growth) though the provision of key infrastructure where needs are identified.

# 4 APPRAISAL OF THE CHANGES TO THE CORE STRATEGY

## 4.1 Introduction

4.1.1 This section outlines the results of the appraisal of the changes to the Core Strategy including details of mitigation measures that could be implemented to improve the performance of the plan.

## 4.2 Appraisal of the Vision and Objectives

4.2.1 There were only minor changes to text to update the Vision. These are mainly additional text on open spaces, green infrastructure, improved ecological networks and tree canopy cover, which strengthens and provides more detail. As the vision has not changed significantly, the previous SA still applied and there was no need for a new assessment.

4.2.2 The changes to the Core Strategy Objectives are minor. The main change is to the Objective 3 figures relating to new dwellings has changed from 14,000 to 13,550 and the target of developing new dwellings on 60% previously developed land has been deleted. As these are strategic objectives, where the aim is to provide new dwellings, the previous SA still applies. The change in figures is reflected in the change to Policy CS7, which requires a new assessment, as discussed below.

## 4.3 Appraisal of Policy Changes

4.3.1 An initial sieve analysis was undertaken to determine the need to reassess the policies and the effects deriving from the changes in the Focused Review Core Strategy. Changes to policies and development management policies are set out in Table C-1 and Table C-2 in Appendix C. The policies are set out in full for clarity and changes to policy such as deletions are indicated as strikethrough and additional text are underlined. An assessment of the significance of the changes was undertaken and those which were assessed as having minor significance were not further assessed, while those which have significantly changed are assessed against the SA objectives. Table 4-1 provides a summary of the analysis.

**Table 4-1 Summary of policy sieve table**

Changes to Policies	Sustainability impacts
No changes were made to the following policies: CS18, DM3, DM6, DM7, DM9, DM11, DM12, DM13, DM15, DM16, DM17, DM18, DM19, DM22, DM24, DM27, DM30	There are no changes to the text and therefore would not change the previous SA Assessment.
Minor updates of text: DM1, DM2, DM4, DM5, DM8, DM23, DM31	The changes would not change the previous SA assessment as these only update the policy with relation time periods, wording, and update of relevant planning policies (NPPF).
Additional text included in the following policies: CS1, CS2, CS3, CS4, CS5, CS6, CS8, CS11, CS12, CS15, CS16, CS19, CS20, CS21, , DM10, DM14, DM20, DM21, DM25, DM26, DM28, and DM29	The additional text would not change the previous SA assessment as they simply update, clarify or strengthen the policy by providing further information or details of implementation.

Field

Changes to Policies	Sustainability impacts
Changes in focus: CS9	The change in focus from seeking to develop 60% of development on PDL to focusing on previously developed land first weakens this policy. The policy still prioritises the re-use of PDL, but the removal of the target is a pragmatic and policy compliant response to the limited land supply in the borough.
Changes to growth figures were made in policy CS7, CS13 and CS14	The changes to the housing, employment and retail figures are considered significant as these changes may have a significant effect on economic, environmental and social SA objectives.
Changes to land allocation and period of land use were made in CS10	The additional text in Policy CS10 provides details which were not assessed in the previous SA. These changes are significant and would require a new assessment.
Changes in delivery mechanisms: CS17	Policy CS17 requires each development to meet site related infrastructure needs, which is a significant change. The policy also sets out the application of Section 106 agreements and includes changes to the broad categories of infrastructure to be included in the CIL charge.

- 4.3.2 The changes to the majority of policies included in the Core strategy are minor and the sieve analysis showed that of 53 policies, the previous SA still applies to 48 policies. The principal material changes are to CS7 housing figures, CS10 Ipswich Northern Fringe, CS13 job figures, CS14 retail figures and CS17 infrastructure.
- 4.3.3 Each of the revised policies was assessed against the SA Objectives using the appraisal matrix Table 2-6 to identify any significant adverse or beneficial effects. The more detailed appraisal of the Policies is included in Appendix F and the summary of the sustainability comments is provided in the section below.

## Sustainability Comments

- 4.3.4 On the whole the revised policies contribute to the achievement of the SA Objectives. However, the implementation of the revised policies was also found to detract from some SA Objectives with potential to have a negative effect if no mitigation measures are put in place.
- 4.3.5 The housing policies CS7 and CS10 directly seek to ensure the provision of a range of housing types including affordable housing, ensuring both market and affordable housing needs are met, which could indirectly encourage inward investment and economic growth. Policy CS10 seeks to ensure access to services including by public transport. The policies also seek to ensure that new development is well connected to other amenities and facilities, is well integrated with the existing townscape, and does not have adverse impacts on (and where possible improves) the quality of the natural environment. Such provisions can offer a number of social and economic benefits, for example relating to accessible jobs and encouraging inward investment. In addition, encouraging the use of public transport, walking and cycling are also beneficial by providing opportunities for individuals to pursue healthy lifestyles.
- 4.3.6 Negative effects from the implementation of the revised housing policies are identified with regards to soil resources, air quality and waste generation. In addition, negative effects are likely to occur with regards to flood risk and landscape due to loss of greenfield land and open space. It is recognised that in order to achieve the economic and social SA objectives there is a

need to use greenfield land and mitigation measure are suggested to reduce the negative effects that may occur as a result of a significant urban extension.

- 4.3.7 Air quality may deteriorate as a result of the envisaged urban extension to the north of the town centre and on key roads near major housing developments in the urban areas. Although measures to encourage the use of sustainable modes of transport are included in the Core Strategy, travel by private car could remain the main mode of transport due to the relatively long distance between the Northern Fringe and employment areas. Although the reuse/recycling of materials is addressed in another policy of the Core Strategy (CS4), it would be beneficial to consider mitigation measures within the revised housing policies as the housing growth figures suggest increase in household and construction waste within the plan period.
- 4.3.8 The policies relating to Jobs Growth and Retail Development (CS13 and CS14) perform very well against the sustainability criteria used in the appraisal and would lead to both direct and indirect benefits. Direct benefits would occur in relation to improved employment opportunities, economic inclusion, long-term economic benefits and an improved education attainment for all age groups. Other indirect benefits will occur with regards to reduction of crime and health inequalities, and also reduction in carbon emissions in the long-term through the allocation of land for retail use in the Central Shopping Area. Policy CS14 seeks to ensure the urban greening is promoted, which would indirectly benefit health and wellbeing.
- 4.3.9 The policy seeking to protect community infrastructure (CS17) ensures that facilities and infrastructure are available to cope with the demand that new development will generate. The introduction of CIL is considered to contribute positively to the achievement of the SA objectives through the allocation of developers' contributions at strategic level on the territory of the whole borough. Positive environmental impacts upon water resources, air quality and biodiversity / geodiversity should also occur if the revised policy is implemented.

## Recommendations and Mitigation Potential

- 4.3.10 It is recommended that the policies are amended to ensure the following:
- Public transport provision (buses) and more frequent train services to the area of Northern Fringe should be envisaged in order to reduce car use. Cycling routes should be provided where appropriate and pedestrian infrastructure should be improved.
  - Any potential contamination of brownfield sites should be remediated to an appropriate level before redevelopment.
  - Opportunities should be sought to increase the percentage of reused or recycled household waste. Key waste materials during the construction of new housing should also be reused / recycled.
  - Opportunities should be sought to create and enhance habitats where new developments occur including through provision of green/open space and the use of SuDS.
  - New development should ensure that designated heritage sites (e.g. listed buildings) are not adversely affected through appropriate design and in particular in terms of scale, height, massing, and alignment of new development.
  - Landscape character should be protected in the Northern Fringe through appropriate scale, density, design of new residential dwellings.
  - Safety by design principles should also be incorporated into the housing policies to ensure that crime levels do not increase as a result of the planned growth of the area and the influx of a significant number of new residents.

- There should be a clear commitment that business growth and new housing and infrastructure developments minimise the use of natural resources and maximises opportunities to reduce waste production.

## 4.4 Cumulative Effects

- 4.4.1 The SEA Directive requires that the assessment includes identification of cumulative and synergistic effects (where the combined effects are greater than the sum of their component parts).
- 4.4.2 The assessment of the policies has been undertaken in a manner which has enabled the cumulative effects of the policies to be assessed. This is important as none of the policies would ever be implemented in isolation and the plan has to be read as a whole. There is also the potential for the plan to have cumulative effects with other plans and programmes that are produced by other authorities such as neighbouring local authorities or the Environment Agency.
- 4.4.3 Table 4-2 summarises the cumulative and synergistic impacts of the plan. The approach identifies receptors, for example the air quality or crime levels that may be affected by cumulative impacts. It also acknowledges where uncertainty has influenced the assessment.

**Table 4-2 Cumulative and Synergistic Impacts**

Receptor	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
Education provision and educational attainment.	Positive	Educational attainment in the borough is generally low. The revised policies are likely to generate positive impacts upon educational attainment through new and diverse employment provision providing skills and training opportunities, land allocated for education uses, local partnerships and initiatives, and also through expansion of the key educational facilities within the Northern Fringe.
Crime and Fear of Crime	Neutral/Positive	Crime levels are generally higher across the borough when compared to national average figures. The projected housing and population growth may result in an influx of new residents and thus have a negative effect on crime level figures in the short-term. However, effects are assessed as neutral/positive in the long-term as cumulatively it is considered that the revised policies will contribute to the achievement of social and economic objectives which may indirectly result in reduced crime levels. The level of certainty of prediction is low.
Access to goods and services	Positive	There is a clear focus ensuring adequate local service provision within relevant sites and making sure that new development is accessible by public transport and walking and cycling links.
Health and Well-Being	Positive	Life expectancy from birth for males is slightly lower than the national average and life expectancy from birth for females is slightly higher than national averages. Whilst health and well-being is affected by a number of factors, there is the potential for four policies and their application to contribute to improved well-being by ensuring that new housing and employment development is well designed and accessible and that there is an excellent green

Receptor	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
		infrastructure network and areas of green space that are available for formal and informal recreation. In the long-term there could be indirect benefits for health and well-being.
Housing	Positive	Cumulatively, the policies in the plan that address housing should ensure that new housing development occurs in the most appropriate locations and meets the needs of a wide range of people. These policies, combined with those addressing infrastructure provision and accessibility should also ensure that housing is supported by the appropriate range of facilities and is accessible to local services creating a high quality housing offer.
Sustainable Economic Growth	Positive	Cumulatively, the revised policies will have a positive effect on the sustainable growth of the borough as employment opportunities will increase both in the short-term and the long-term through the allocation of land for residential and employment/retail use. This in combination with infrastructure improvements will create an attractive environment for and inward investment and business growth.
Biodiversity – protection of designated sites	Positive / Negative	The revised policies will have both negative and positive effects on biodiversity and designated sites within the borough. Cumulatively, land take for new developments, community facilities and infrastructure will have a direct negative effect associated with fragmentation and potential loss of habitats and species. Some positive effects may occur as a result of the delivery of green infrastructure, enhancement of habitats within new developments (through the creation of new Country park and opportunities to enhance the land allocated for open space) and remediation of contaminated land where possible.
Landscape/Townscapes	Negative	Cumulatively, it is considered that the urban expansion and projected growth will have a negative effect on landscape due to significant changes in landscape character of as a result of direct loss of green fields. The revised policies contain a commitment that specifically ensures that the local distinctiveness is protected particularly with regards to the rural character of northern parts of the borough. However, the policies should seek to ensure that additional mitigation measures are implemented (e.g. appropriate scale, density, and layout design) to reflect the local landscape character. Landscape assessment at EIA level will be required.
Climate Change Air Quality Energy Efficiency Natural Resources Sustainable Transport	Positive/Negative	Through the revised policies there is a strong focus upon ensuring new development is accessible by public transport, walking and cycling links and that new housing, services and employment opportunities are appropriately sited. All of these measures should contribute in the long-term to enabling sustainable patterns of living and travel to be developed which could have a positive effect upon reducing carbon emissions from transportation sources and upon improving local air quality. The delivery of Ipswich Flood Defence infrastructure will also provide benefits associated with increased resilience to climate change effects. There is a degree of uncertainty about these cumulative effects being realised as this is

Receptor	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
		<p>reliant upon travel choices of individual residents and workers.</p> <p>All new development across the borough has the potential to result in a cumulative increase in the use of natural resources and waste generation. Mitigation measures should be implemented to minimise the potential cumulative negative effects.</p>
Water Resources	Negative /Positive	<p>New development is likely to place pressure on water resources and increase consumption of water resources. However, there is mitigation suggested within the revised policies to ensure sustainable design, appropriate flood risk management and sustainable (urban) drainage systems incorporated into new development. The enhancement of the green infrastructure network across the borough will also provide benefits for infiltration and water management. Mitigation should also be implemented to encourage measures to reduce potable demand, use of rain water harvesting and greywater recycling systems to reduce domestic water use.</p>

## 5 NEXT STEPS

- 5.1.1 This Interim SA is being issued for informal consultation alongside the Draft Core Strategy Review DPD from 13<sup>th</sup> January to 10<sup>th</sup> March 2014. Following the consultation, comments will be considered during the development of the DPD. The formal consultation is expected to run from July to August 2014. A Draft SA Report will be produced for the Submission Core Strategy.



Appendix A

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## Review of Plans, Programmes and Environmental Protection Objectives

# Appendix B



## Baseline Data

## Sieve analysis of changes to policies

## Scoping Report Comments

## Sustainability appraisal of alternatives

Appendix F

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## Sustainability Appraisal of Revised Policies

Appendix A

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## Review of Plans, Policies and Programmes

## International Plans and Programmes

- World Summit on Sustainable Development (WSSD), Johannesburg, September 2002
- European Sustainable Development Strategy (2006)
- EU Sixth Environmental Action Plan 2002 - 2012
- European Spatial Development Perspective (ESDP) (May 1999)
- Aarhus Convention (Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters) (1998)
- UN Framework Convention on Climate Change (1992)
- Kyoto Protocol to the UN Framework Convention on Climate Change (1997)
- Second European Climate Change Programme (ECCP II) 2005
- Directive to Promote Electricity from Renewable Energy (2001/77/EC)
- European Transport Policy for 2010: A Time to Decide
- EU Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC)
- Water Framework Directive (2000/60/EC)
- Drinking Water Directive (98/83/EC)
- Directive on the Assessment and Management of Flood Risks (2007/60/EC)
- Marine Strategy Framework Directive (2008/56/EC)
- UN Convention on Biological Diversity (1992)
- Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)
- Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)
- EU Birds Directive (2009/147/EC)
- Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC)
- Ramsar Convention on Wetlands of International Importance, especially as waterfowl habitat (1971)
- EU Biodiversity Strategy (1998)
- European Landscape Convention (2000)
- UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage (1972)
- Waste Framework Directive (2008/98/EC)
- Packaging and Packaging Waste Directive (94/62/EC) (as amended by 2004/12/EC and 2005/20/EC)
- Urban Waste Water Treatment Directive 91/271/EEC
- SEA Directive 2001/42/EC
- The Granada Convention on the Protection of the Architectural Heritage of Europe (1985)
- The Valetta Convention on the Protection of the Archaeological Heritage (Revised) (1992)

## National Plans and Programmes

- UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)
- Securing the Regions' Futures – Strengthening the Delivery of Sustainable Development in the English Regions (2006)
- Sustainable Communities: Building for the Future (2003)
- Planning Act 2008
- Environmental Quality in Spatial Planning (2005)
- World Class Places: The Government's Strategy for Improving Quality of Place (2009)
- The Countryside in and Around Towns: A vision for connecting town and country in the pursuit of sustainable development (2005)
- The Code for Sustainable Homes: Setting the Standard in Sustainability for New Homes (2008)
- Sustainable Communities, Settled Homes, Changing Lives – A Strategy for Tackling Homelessness (ODPM) (2005)
- Climate Change Act (2008)
- Stern Review of the Economics of Climate Change (2006)
- UK Carbon Plan (2011)
- Climate change and biodiversity adaptation: the role of the spatial planning system – a Natural England commissioned report (2009)
- Planning for Climate Change – Guidance and Model Policies for Local Authorities (2010)
- Energy White Paper: Meeting the Energy Challenge (2007)
- Energy Act 2011
- Delivering a Sustainable Transport System (2008)
- The Future of Transport White Paper – A Network for 2030 (2004)
- Low Carbon Transport: A Greener Future - A Carbon Reduction Strategy for Transport (2009)
- Wildlife and Countryside Act (1981) (as amended)
- The Conservation of Habitats and Species Regulations (2010)
- The Countryside and Rights of Way (CRoW) Act (2000)
- The Natural Environment and Rural Communities Act (2006)
- The Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)
- Conserving Biodiversity – The UK Approach (2007)
- Working with the Grain of Nature: a Biodiversity Strategy for England (2002)
- UK Biodiversity Action Plan (1994)
- Biodiversity by Design: A Guide for Sustainable Communities (Town and Country Planning Association) (2004)
- UK Post-2010 Biodiversity Framework 2012

- Biodiversity Indicators in Your Pocket (2010) Defra
- A Strategy for England's Trees, Woodlands and Forests (2007)
- Open Space Strategies: Best Practice Guidance (CABE and the Greater London Authority, 2009)
- Heritage in Local Plans: How to create a sound plan under the NPPF
- The Geological Conservation Review (GCR) (ongoing)
- Safeguarding our Soils: A Strategy for England (Defra, 2009)
- Natural England's Green Infrastructure Guidance (2009)
- Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation (2003) and Nature Nearby: Accessible Green Space Guidance (2010)
- Historic Environment: A Force For the Future (2001)
- The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)
- Water Resources Strategy for England and Wales (2009)
- Future Water: The Government's Water Strategy for England (2008)
- Flood and Water Management Act (2010)
- Making Space for Water: Taking Forward a New Government Strategy for Flood and Coastal Erosion Risk Management (2005)
- Waste Strategy for England (2007)
- The Egan Review – Skills for Sustainable Communities (2004)
- Working for a Healthier Tomorrow – Dame Carol Black's Review of the health of Britain's working age population (2008)
- Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002
- Tackling Health Inequalities – A Programme for Action (2003, including the 2007 Status Report on the Programme for Action)
- Water for People and the Environment: A Strategy for England and Wales (2009)
- National Planning Policy Framework (2012)
- Localism Act 2011
- PPS10: Planning for Sustainable Waste Management (2005) and A Companion Guide to PPS10 (2006)
- Building for Life 12
- Europe 2020: UK National Reform Programme 2013, April 2013
- Planning (Listed Buildings and Conservation Areas) Act (1990)
- Ancient Monuments and Archaeological Areas Act (1979)

## Regional and County Level Plans and Programmes

- A Sustainable Development Framework For The East Of England (2001)
- East of England Forecasting Model 2012
- Transforming Suffolk's Community Strategy 2008-2028 (2008 revision)

- Transforming Suffolk Community Strategy: Suffolk Strategic Partnership (2008)
- Inventing our Future: Collective Action for a Sustainable Economy. The Regional Economic Strategy for the East of England 2008 – 2031 (2008)
- Suffolk Growth Strategy 2013
- Minerals and Waste Development Framework: Waste Core Strategy (2011), Minerals Core Strategy 2008
- Joint Municipal Waste Management Strategy for Suffolk 2003 – 2020
- Suffolk's Climate Action Plan 2 (2012)
- Suffolk's Local Transport Plan 2011 - 2031
- New Anglia Local Enterprise Partnership 'Towards a Growth Plan' 2013
- Expanding Suffolk's Horizons: Economic Strategy – Taking Suffolk to 2013
- East of England (LSC) Equality and Diversity Action Plan 2008
- Suffolk Haven Gateway Employment Land Review 2009
- East of England Plan for Sport (2004)
- Biodiversity Action Plan for Suffolk (Various dates)
- Water for Life and Livelihoods: River Basin Management Plan: Anglian River Basin District (2009)
- In Step with Suffolk: Right of Way Improvement Plan (2006-16)
- Leading the Way – Green Economy Pathfinder Manifesto 2012-15, New Anglia LEP
- Wild Anglia Manifesto ,September 2013, Part 1 Aims and Objectives
- Suffolk Growth Strategy March 2013

## Local Plans and Programmes

- One-Ipswich Community Strategy 'Everybody Matters' 2008 – 2010
- Ipswich Borough Council Level 2 Strategic Flood Risk Assessment (2011)
- Core Strategy and Policies Development Plan Document (adopted 2011)
- The Ipswich Drainage and flood defence policy (2002-9)
- Integrated Landscape Character Objectives (2010)
- Countryside Character Volume 6: East of England (1998)
- Ipswich Economic Development Strategy 2012 – 2026 DRAFT
- Ipswich Borough Council Corporate Plan (2012)
- Ipswich Cultural Strategy 2011-2014
- Ipswich Environment Strategy 2010
- The Ipswich Health and Wellbeing Strategy 2011 – 2016
- Ipswich Housing Strategy 2010/11-15/16
- Ipswich Town Centre Master Plan 2012
- Ipswich Open Space and Biodiversity Policy/Strategy 2013-2023
- Tree Management Policy 2010

- Allotment Strategy 2005
- The draft Ipswich Strategic Housing Land Availability Assessment update 2013 (SHLAA)
- Ipswich Housing Market Area Strategic Housing Market Assessment 2012
- Ipswich Transport Model Assessment, Aecom, 2010
- Suffolk Coastal District Council Core Strategy and Development Management Policies adopted 5th July 2013
- Mid Suffolk District Council Core Strategy Focused Review adopted December 2012
- Babergh Core Strategy and Policies DPD (at Examination October 2013)
- A Fairer Ipswich Equality Scheme 2012-15
- Community Cohesion Policy 2009
- Equality and Diversity policy 2010
- Homelessness Strategy 2008-13
- Ipswich Local Transport Plan (part of the Suffolk LTP, SCC)
- Air Quality Management Strategy
- Tourism Strategy 2004
- Ipswich Employment Land Availability Report 2012
- Ipswich Development and Flood Risk SPD
- Haven Gateway Green Infrastructure Study 2008
- Open Space and Biodiversity Policy/Strategy 2013-2023
- Haven Gateway Water Cycle Study Stage 2 Report 2009

# Summary of Regional and Sub-Regional Plans

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>A Sustainable Development Framework For The East Of England (2001)</b>			
<p>Sets out the vision for the East England, which aims to improve the quality of life for people in the region which is sustainable in the long term future.</p> <p>To achieve sustainable levels of prosperity and economic growth.</p> <p>To deliver more sustainable patterns of location of development, including employment and housing.</p> <p>To protect and maintain most valuable regional assets such as designated habitats, landscapes of natural beauty, and our historic built heritage, and to improve the wider environment by means of adequate investment and management.</p> <p>To reduce our consumption of fossil fuels.</p> <p>To achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region.</p> <p>To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible.</p> <p>To minimise the production of by-products or wastes, aiming for 'closed systems' where possible.</p> <p>To avoid using the global environment to underwrite an unsustainable way of life (e.g. dependence on unsustainably produced and/or transported food imports or timber).</p> <p>To revitalise town centres to promote a return to sustainable urban living.</p>	<p>1) Adoption of Environmental Management Systems (EMS) and 'Green Accounting' by businesses</p> <p>2)New homes built on previously developed land Number of vacant properties cycle, bus, passenger rail, rail freight Traffic congestion Availability of affordable housing, attractive streets and buildings.</p> <p>3) Populations of wild birds Area of semi-natural habitat lost to development Area of new semi-natural habitat created Wildlife sites affected by water abstraction Loss/damage to Sites of Special Scientific Interest (SSSIs) Species at risk Buildings of Grade I and II* at risk of decay Changes in landscape features - woodland, hedges, stone walls and ponds Area of ancient semi-natural woodland</p> <p>4)Output of greenhouse gas and particularly CO2 Weather-related insurance claims Regional energy consumption compared with population and GDP Energy use per household Proportion of electricity generated from renewable</p>	<p>The plan objectives and policies need to be broadly compatible with the priorities and long term goals of the plan.</p>	<p>The SA Framework should be compatible with Regional Spatial Development Framework. Detailed objectives should be consistent with the overarching RSDF objectives, and include issues covering growth, natural resources, social progress, protection of the environment etc.</p>

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	<p>sources</p> <p>Economic health and prospects of energy industry, including off-shore</p> <p>Proportion of total travel which is by car</p> <p>Transport's share of region's CO2 emissions</p> <p>Freight transport: tonne/miles and empty lorry miles</p> <p>Air quality improvements measured against related illnesses</p> <p>Tourism by mode of transport</p> <p><b>5)</b> Proportion of housing unfit or lacking appropriate insulation, by area</p> <p>Availability of public services - transport, shops, banks etc by area</p> <p><b>6)</b> Household water use and peak demand</p> <p>Low flows in rivers</p> <p>Margin between water supply and projected demand</p> <p>% of water lost to leakage</p> <p>Area under agri-environment schemes</p> <p>Area converted to organic production</p> <p>Concentration of organic matter in agricultural top-soils</p> <p>Volumes of minerals produced in the region</p> <p>Level of minerals and aggregate use replaced by recycled or substitute materials</p> <p>Number of exhausted mineral sites returned to suitable use</p> <p>Construction and demolition waste going to landfill</p> <p>Imported mineral tonnage</p> <p>Numbers of dwellings created by re-use of existing</p>		

**Regional and Sub-Regional Plans**

**Key Objectives Relevant to Plan and SA**

**Key Targets and Indicators Relevant to Plan and SA**

**Implications for Plan**

**Implications for SA**

buildings  
 Number of buildings designed to sustainability principles  
**7)** Levels of wastes and emissions (nutrients, pesticides, herbicides)  
 Household waste and recycling  
 Rivers of good or fair quality  
 Proportion of water needs met by local water recycling in urban and rural areas  
 Compliance with Bathing Water Directive  
 Concentrations of persistent organic pollutants  
 Air quality - number of days per year any parameter exceeds its National Standard  
**8)** Percentage of food, timber, and raw materials used in the region which is imported from unsustainable sources  
 Percentage of food consumed in the region that is produced locally  
 Number of farmers markets, and local trading schemes  
**9)** Vacant land and properties and derelict land  
 Proportion of new retail in town centres versus out-of-town  
 Proportion of population living in town centres  
 Access to local green space  
 Quality of surroundings  
 Noise levels  
 Rates of fear of crime  
 % households stating their neighbourhood has 'community spirit'

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>East of England Forecasting Model 2012</b>			
<p>The East of England Forecasting Model (EEFM) was developed by Oxford Economics to project economic, demographic and housing trends in a consistent fashion. It covers a wide range of variables, and is designed to be flexible so that alternative scenarios can be run.</p> <p>The EEFM provides a set of 'baseline' forecasts for the East of England prepared by a leading independent forecasting house (Oxford Economics).</p>	<p>The East of England is expected to outperform the UK in the medium to long term, according to the Spring 2012 baseline forecasts, with 10.8% employment growth over 2011-21 compared with only 6.9% in the UK.</p> <p>The baseline forecasts anticipate annual average GVA growth of 2.7% between 2010 and 2020.</p> <p>Population growth over 2010-20 is estimated at 9.4%</p> <p>Net in-migration will continue, but at a lower rate than during the past decade. By 2020, the region's population will be 547,900 higher than in 2010. The baseline forecasts anticipate a strong recovery in employment, with the East of England returning to its 2008 employment peak by 2013, and an additional 327,000 jobs between 2010 and 2020.</p>	<p>The model lists key economic projections for the East of England which should be taken into account.</p>	<p>The SA needs to include objectives that relate to economic growth and appropriate housing provision to meet the needs of an expanding population.</p>
<b>Transforming Suffolk's Community Strategy 2008-2028 (2008 revision)</b>			
<p>Aim is to improve quality of life in Suffolk for its people and communities. Document focuses on the future looking forward to the next 20 years and is based around four themes.</p> <p><b>A Prosperous and Vibrant Economy:</b></p> <p><b>Learning and skills for the future:</b></p> <p><b>Creating the Greenest County</b></p> <p><b>Safe, Healthy, Inclusive Communities</b></p>	<p>To become the most innovative and diverse economy in the East of England:</p> <p>Transport and infrastructure to support sustainable growth</p> <p>Learning and skills levels in the top quartile in the country</p> <p>County with greatest reduction in carbon emissions;</p> <p>Reducing carbon footprint;</p> <p>Adapting to climate change and geography;</p> <p>Retain and maintain natural and historic environments</p> <p>Pursue healthy lifestyles, safety, and sense of community belonging</p>	<p>A number of the key ambitions outlined in the document need to be considered when developing the plan.</p>	<p>The SA Framework should integrate the four core themes and principles</p>

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Transforming Suffolk Community Strategy: Suffolk Strategic Partnership (2008)</b>			
<p>Purpose of Suffolk LLA is to improve performance in an area. There is a close similarity between the outcomes in Suffolk Strategic Partnership's community strategy and those agreed for Ipswich:</p> <p>Local Strategic Partnerships for Ipswich:</p> <p>Everyone should have a roof over their head</p> <p>Everyone should enjoy good health</p> <p>There should be work for all</p> <p>The creation of a better environment</p> <p>People should be kept safe</p> <p>People should live in friendly and supportive communities.</p>	<p>Ipswich Priorities:</p> <p>Working at neighbourhood level to tackle deprivation and address health, social and economic inequalities</p> <p>Community cohesion and integration of new communities</p> <p>Meeting the growing demand for affordable homes, social rented housing and a partnership approach to addressing deprivation, inequalities and environmental issues relating to housing</p> <p>Tackling drug related crime</p> <p>Environmental issues – making sure Ipswich grows in the right way</p> <p>Supporting business to grow and create more jobs.</p>	<p>The actions, indicators and targets of the LLA should be considered in the development of the plan.</p>	<p>The SA Framework should incorporate indicators and targets as appropriate.</p>
<b>Inventing our Future: Collective Action for a Sustainable Economy. The Regional Economic Strategy for the East of England 2008 – 2031 (2008)</b>			
<p>Vision: By 2031 East of England to be:</p> <p>Internationally competitive with the global reputation for innovation and business growth</p> <p>A region that harnesses and develops the talents and creativity of all</p> <p>At the forefront of the low carbon and resource efficient economy</p> <p>Also:</p> <p>Emphasis on developing, attracting and retaining talent to drive the economy</p>	<p><u>Productivity and prosperity</u></p> <p>Annual growth in real workplace based GVA over 2008 – 2031</p> <p>2.3% per capita</p> <p>21.% per worker</p> <p><u>Employment</u></p> <p>Rate by 2031</p> <p>Working age population: 80%</p> <p>16-74 population: 70%</p>	<p>The plan should seek to support business growth and enterprise. Particularly it should include objectives of low resource use and carbon efficiency.</p>	<p>The SA Framework should include objectives that encourage enterprise and business development. It should also include the goals that support the local economy, attract world class businesses, support and develop the</p>

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>Transforming to a low resource use and low carbon economy and success in adapting to climate change both for the environment and as an opportunity for business growth</p> <p>Objectives:</p> <p>Enterprise development</p> <p>Innovation</p> <p>Digital economy</p> <p>Resource efficiency</p> <p>Skills for productivity</p> <p>Economic participation</p> <p>Transport</p> <p>Spatial Economy</p>	<p><u>Skills</u></p> <p>Share of working age population with qualification by 2020 (age 19 to state pension age)</p> <p>NVQ Level 2 or equivalent and above: 90%</p> <p>NVQ Level 3 or equivalent and above: 68%</p> <p>NVQ Level 4 or equivalent and above: 40%</p> <p><u>Inequality</u></p> <p>Earnings</p> <p>Level of lower quartile to average income by 2031: 60%</p> <p><u>Greenhouse Gasses</u></p> <p>End user attributed CO2 Emissions by 2031</p> <p>Reduction on baseline level: 60%</p> <p><u>Water Resources</u></p> <p>Household per capita consumption of water</p> <p>Reduction on 2008 baseline levels by 2030: 20%</p> <p>Per capita consumption in 2030: 120litres per head per day</p>		<p>local workforce, create stronger and more self-reliant communities with a shift towards a low carbon economy.</p>
Minerals and Waste Development Framework: Waste Core Strategy (2011)			
<p>Vision:</p> <p>Cease of landfilling of untreated municipal, commercial and industrial wastes by 2026</p> <p>Recovering value from waste that cannot practically be recycled or composted</p> <p>Waste management activities to be sensitively located and appropriately operated to high standards to reduce impact/harm on the environment, human health and local amenity and tranquility</p> <p>Former temporary waste management activities (i.e. landfill sites) will be</p>	<p>Relevant targets:</p> <p>Minimise waste as a priority and encourage communities to take responsibility for the waste they produce through better education through a public consultation</p> <p>Have efficient transportation of waste throughout Suffolk</p> <p>Increase access to Household Waste Recycling Centres</p> <p>Minimise adverse impacts on air quality</p>	<p>The plan needs to take into consideration the vision, aims and objectives of the core strategy and seek to promote the overall the strategy of sustainable waste management. The plan should seek to promote more sustainable patterns</p>	<p>The SA framework must encourage sustainable waste management strategy and targets related to waste management.</p>

Regional and Sub-Regional Plans							
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA				
<p>restored to a quality and a state conducive to appropriate after uses such as agriculture and improving habitat biodiversity</p> <p>Aims (reflect national and regional water policy together with local considerations):</p> <p>Manage volume of waste identified in the East of England plan as being apportioned to Suffolk</p> <p>To promote and encourage sustainable practices in the transportation and management of waste</p> <p>Contribute to social and economic well being</p> <p>To protect against adverse impacts on human wellbeing and to ensure waste management facilities do not endanger human health</p> <p>To protect and enhance the built, natural and historic environment</p> <p>To assist in reducing the impacts of climate change upon the environment</p>	<p>Minimise adverse impacts on landscape quality and the built and historic environment</p>	<p>of production and consumption, for example by promoting rates of recycling.</p>					
Joint Municipal Waste Management Strategy for Suffolk 2003 – 2020							
<p>Enhance joint working between authorities to improve waste management services</p> <p>Involve public community groups, waste management industry and governmental bodies in all aspects of waste management</p> <p>Promotion of education programmes and awareness campaigns to increase knowledge of waste issues and participation in waste management initiatives</p> <p>Promote and encourage waste reduction and make representation seeking changes to national taxation regulation regimes in order to encourage waste reduction</p> <p>Promote and encourage waste re-use schemes:</p> <p>Supporting communities re-use schemes with advice and funding where resource allow</p> <p>Promote awareness of what people can do to re-use waste</p>	<p><u>National Recycling and Recovery targets:</u></p> <p>Household waste recycling and composting</p> <p>Recover 45% by 2015</p> <p>Recover 50% by 2020</p> <p>Municipal waste recovery:</p> <p>Recover 67% by 2015</p> <p>Recover 75% by 2020</p> <p>Landfill Allowance Trading Scheme (LATS) Landfill allowances:</p> <table border="1"> <thead> <tr> <th>LATS</th> <th>Landfill Allowance</th> </tr> </thead> <tbody> <tr> <td>2013</td> <td>99,160</td> </tr> </tbody> </table>	LATS	Landfill Allowance	2013	99,160	<p>The plan should recognise the need to implement sustainable waste removal strategies that do not impact on human health or the environment.</p> <p>The waste policy elements of the plan need to be developed in accordance with the waste strategy.</p> <p>There needs to be a clear commitment to the waste hierarchy.</p>	<p>Consider waste management options particularly with new community developments</p>
LATS	Landfill Allowance						
2013	99,160						

Regional and Sub-Regional Plans				
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA		Implications for Plan	Implications for SA
<p>Encourage the re-use of waste collected through recycling centres</p> <p>Seek to maximise the proportion of waste that is recycled or composted, aiming to achieve at least 60% by 2015</p> <p>Introduce “three stream” collection system from the curb side of at least 80% of households in Suffolk by 2010</p> <p>Investigate the possibility of introducing the curb side collection of glass</p> <p>Promote home composting in all areas through promotional and educational campaigns</p> <p>Support community composting initiatives</p> <p>Increase the number of bring sites for the collection of glass throughout the county</p> <p>Optimise the number and location of household waste and recycling centres; increase the quantity and range of material recycled – aiming to recycling 55% of waste taken to sites by 2015</p> <p>Introduce non landfill facilities for the treatment of residual waste</p> <p>Minimise the amount of waste landfill by maximising reduction, re use, recycling and composting</p> <p>Reduce costs by securing joint procurement and tendering and maximising funding from external sources</p> <p>Work with Waste and Resource Action Programme, businesses and the community in order to develop markets for recycled waste and outlets.</p>	2020	69,385		
	<p><u>Regional relevant targets:</u></p> <p>Minimise the impacts of new developments, especially in the Key Centres of Development and Change, on regional waste management requirements</p> <p>Minimise the environmental impact of waste management arising from movement of waste, and help secure the recovery and disposal of waste without endangering human health</p> <p>Recognise particular locational needs of some types of waste management facilities in determining planning application and defining green belt boundaries</p> <p>Targets to minimise waste and provide the basis for implementing the overall aim of recycling, composting, and recovering value from waste:</p> <p>Municipal waste – recovery of 70% by 2015</p> <p>Commercial and industrial waste – recovery of 75% by 2015; and eliminate landfilling of untreated municipal and commercial waste in the region by 2021</p> <p><u>Relevant Indicators:</u></p> <p>Kilograms of household waste collected per head (BVPI 84) – Waste Disposal Authority (WDA) and seven Waste Collection Authority (WCA) figures combined;</p> <p>Tonnage and percentage of household waste recycled and composted, including HWRC (BVPIs 82a and 82b);</p> <p>Percentage of householders that have a separate</p>			

**Regional and Sub-Regional Plans**

Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	kerbside collection of dry recyclable and compostable waste; Number of home composters distributed via partnership scheme; Recycling rate at HWRCs; Tonnage of municipal waste landfilled		

**Suffolk's Climate Action Plan 2 (2012)**

Develop a credible pathway to reduce carbon emission associated with energy use in Suffolk by 60% (on 2004 levels) Support the development of a green economy Adapt to future climate change and resource scarcity	Reduction of Suffolk's annual CO2 emission by 760kt by the end of the decade – Foster resilience to climate change (i.e. winter flooding and summer heat wave events) and promote water saving and energy efficiency	The plan must incorporate climate change and adaption and mitigation options.	The SA Framework should echo the vision and objectives of the plan. It should include an objective to reduce greenhouse gas emissions and adapt to unavoidable climate change.
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**Suffolk's Local Transport Plan 2011 - 2031**

Priorities:  Creating a prosperous and vibrant economy Creating the greenest county Safe, healthy and inclusive communities (Protect vulnerable people and reduce inequalities) Learning and skills for the future (Transform learning and skills)	Transport aims to meet priorities:  1) Improve connectivity and accessibility Maintain core transport networks. Balance capacity and demand for travel, through increasing the use of sustainable transport and reducing need for travel Improve access to jobs and commercial markets for residents and businesses based in the county  2) Reduced emissions from transport, including road maintenance	There needs to be an alignment between Suffolk's Transport strategy and the plan.	The SA must include the objectives of the wider Transport Plan. The SA Framework should include the goals and indicators within the plan to address transport and accessibility, and seek to ensure that any new transport development in the District is sustainable and encourages a modal shift away from the use
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Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	<p>Maintaining resilience of transport networks (e.g. coping with flooding, pot holes, winter damage)</p> <p>Reduced air pollutant emissions</p> <p>3)</p> <p>Facilitating an increase in walking and cycling</p> <p>Improving the physical accessibility of the transport system, improving information about travel options, improving access to services for those without access to cars</p> <p>Supporting wider regeneration</p> <p>Reducing the number of casualties on the transport network</p> <p>Reducing impact of poor air quality on local communities</p> <p>4)</p> <p>Improving accessibility to schools, colleges, universities and other places of learning</p> <p>Access to broadband for online learning</p>		of the private car.
New Anglia Local Enterprise Partnership 'Towards a Growth Plan' 2013			
<p>We have a simple Vision for New Anglia in 2025- more jobs, businesses and prosperity.</p> <p>In 2025, Greater Norwich and Greater Ipswich will be two of the most competitive City regions in Europe for domestic and foreign investment. Suffolk and Norfolk will have as international reputation for our home produced food, the quality of our festivals and cultural events and the beauty and diversity of our coasts and countryside.</p> <p>School attainment throughout New Anglia will match the best in Europe making it easy to attract skilled and talented professionals to drive our global companies.</p> <p>Superfast broadband and 6g mobile phone services will be available</p>	<p>The UK economy will grow by 0.6% during the rest of 2013 and by 1.8% and 2.3% in the next two years.</p>	<p>The plan lists commitments which should be taken into account in other Council documents.</p>	<p>The SA should include objectives that will support growth and provision of jobs.</p>

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
everywhere in New Anglia.			
Expanding Suffolk's Horizons: Economic Strategy – Taking Suffolk to 2013			
<p>Aims to promote and develop what makes Suffolk a special and distinctive place in which to live and work but at the same time addressing one central target, raising Gross Value Added (GVA) per head.</p> <p>Objectives:</p> <p>Raising wage and skill levels more closely in line with regional average</p> <p>Promoting innovation and entrepreneurship</p> <p>Stimulating enterprise and ambition, particularly among young people</p> <p>Developing Suffolk's economy around centres of excellence of key growth areas</p> <p>Ensuring growth is sustainable economically and environmentally</p>	<p>Increase GVA per head by 95% of UK Average</p> <p>Increase net business formation rate by 1% per annum</p> <p>Increase gross weekly pay for full time employees to 94% of regional median</p> <p>Increase number of new jobs created/safeguard through inward investment by 10%</p> <p>Increase the value of tourism by 2% per annum</p> <p>Increase the levels of education and qualifications</p> <p>Promote Ipswich in the Environmental Agency's flood defence register with a further commitment to protect areas of significant commercial/agricultural value</p>	<p>This must be taken into account with the regional economic strategy and ensure that all four objectives are taken into consideration.</p>	
East of England Learning and Skills Council (LSC) Equality and Diversity Action Plan 2008			
<p>It lays out actions for the LSC East of England to meet its statutory duties as laid out in the LSC Single Equality Scheme</p> <p>The action plan is broken into four areas:</p> <p>Learning and skills</p> <p>Performance of the system</p> <p>Impact measures and impact assessment</p> <p>Governance</p>	<p>Raise the quality and improve the choice of learning opportunities</p> <p>Raise the skills of the region, giving employers and individuals the skills they need to improve productivity</p> <p>Raise their contribution to economic development</p> <p>Raise the performance of a world class system that is responsive, provides choice and is valued and recognised for its excellence</p> <p>To provide measures that will enable overall progress to be judged</p> <p>Make promoting equality and diversity an integral part of how the East of England LSC is led and governed</p>	<p>To be used as guidance for diversity and equality.</p>	<p>To be used as guidance for diversity and equality.</p>

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>Suffolk Haven Gateway Employment Land Review 2009</b>			
The Employment Land Review and Strategic Sites Study for Suffolk Haven Gateway looks into providing the right mix of employment land to meet the future job growth target of 30,000 in the Suffolk Haven Gateway sub-region. There are evident opportunities through investment in infrastructure and allocation of employment land in the right locations (the A14 and the Ipswich Fringe) to provide a quality and choice that will support efforts to retain existing businesses and encourage new ones and thereby work to achieve the employment target.	No specific indicators or targets of relevance in this plan or programme.	Key baseline indicators included in the review should be taken into account.	The SA should include objectives that will support growth and provision of employment land.
<b>East of England Plan for Sport (2004)</b>			
The aim is to change the culture of sport and physical activity in England in order to increase participation across all social groups leading to improvements in health and in other social and economic benefits; and providing the basis for progression into higher levels of performance.	Key targets: Increasing participation in sport and active recreation Improving levels of performance Widening access Improving health and well being Creating stronger and safer communities Improving education Benefiting the economy	The plan policies should provide a framework within which increased participation can occur. In particular opportunities to improve access to existing facilities, to prevent the loss of existing facilities and to support the provision of new ones.	The SA Framework should consider objectives to increase participation in sport through improved access and additional facilities. Suitable objectives should also be developed in relation to protecting human health.
<b>Biodiversity Action Plan for Suffolk (Various dates)</b>			
The plan comprises a series of action plans for habitats and species in Suffolk.  For each of the habitats and species information is provided about current national, regional and local status.	For each habitat type/species a series of objectives, actions and timescales for implementation are identified.	The plan needs to incorporate policies that support and promote the enhancement of biodiversity.	The relevant objectives, targets and indicators should be integrated into the SA Framework.
<b>Water for Life and Livelihoods: River Basin Management Plan: Anglian River Basin District (2009)</b>			
This plan has been prepared under the Water Framework Directive, which	<b>By 2015, 16 per cent of surface waters (rivers, lakes,</b>	The plan should consider	The SA Framework

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>requires all countries throughout the European Union to manage the water environment to consistent standards. Each country has to:</p> <p>Prevent deterioration in the status of aquatic ecosystems, protect them and improve the ecological condition of waters;</p> <p>Aim to achieve at least good status for all water bodies by 2015. Where this is not possible and subject to the criteria set out in the Directive, aim to achieve good status by 2021 or 2027;</p> <p>Meet the requirements of Water Framework Directive Protected Areas;</p> <p>Promote sustainable use of water as a natural resource;</p> <p>Conserve habitats and species that depend directly on water;</p> <p>Progressively reduce or phase out the release of individual pollutants or groups of pollutants that present a significant threat to the aquatic environment;</p> <p>Progressively reduce the pollution of groundwater and prevent or limit the entry of pollutants;</p> <p>Contribute to mitigating the effects of floods and droughts.</p>	<p><b>estuaries and coastal waters) in this river basin district are going to improve for at least one biological, chemical or physical element</b>, measured as part of an assessment of good status according to the Water Framework Directive. This includes an improvement of <b>1,700 km</b> of the river network in relation to fish, phosphate, specific pollutants and other elements.</p> <p><b>By 2015 19 per cent of surface waters will be at good ecological status/potential and 45 per cent of groundwater bodies will be at good status.</b> In combination 20 per cent of all water bodies will be at good status by 2015. The Environment Agency wants to go further and achieve an additional two per cent improvement to surface waters across England and Wales by 2015.</p> <p>The biological parts of how the water environment is assessed – the plant and animal communities – are key indicators. <b>At least 30 per cent of assessed surface waters will be at good or better biological status by 2015.</b></p>	<p>how the water environment can be protected and enhanced.</p>	<p>should include objectives that consider effects upon water quality and resources.</p>
In Step with Suffolk: Right of Way Improvement Plan (2006-16)			
<p>Objectives:</p> <p>Provide a better signed, maintained and accessible network</p> <p>Provide and a protect a more continuous network that provides for the requirements of all users</p> <p>Develop a safer network</p> <p>Increase community involvement in improving and managing the network</p> <p>Provide an up to date publically available digitised definitive map for the</p>	<p>No relevant indicators</p>	<p>The implications for rights of way, access and recreation should be considered in the preparation of the plan.</p>	<p>Baseline information, issues and opportunities are identified within the Improvement Plan. These should be considered when developing the SA Framework.</p>

<b>Regional and Sub-Regional Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
whole of Suffolk Improve promotion, understanding and use of network			
<b>The Ipswich Drainage and flood defence policy (2002-9)</b>			
Sets out the Council's policy relating to flood protection and drainage Objectives: Control of development in areas at risk of flooding The Inspection and maintenance of ordinary watercourses Establishing flood warnings and emergency evacuation Creating sustainable urban drainage systems (SuDS) Includes: gardens, roads, pipework and manholes, private roofs, driveways and car parks; construction infiltration systems	No specific targets and indicators	Drainage and flood defence policies must be incorporated in the preparation of the plan.	The SA must highlight and incorporate these objectives.
<b>Integrated Landscape Character Objectives (2010)</b>			
The aim was to develop a regional urban landscape typology for the East of England. It articulates the broad variety of towns and cities in the region and the characteristics of the urban landscape of each settlement. Provides an overview of landscape character and settlements for informing future assessment such as green infrastructure strategies for extension to existing settlements and creation of new settlements.	Development must maintain a "sense of place" relevant to the area.	Landscape character should form a component of the plan baseline and should be considered when proposing new development.	The SA Framework should include an objective on landscape quality.
<b>Countryside Character Volume 6: East of England (1998)</b>			
This document presents the results of Natural England's survey of the countryside character and landscape of the East of England.  Many different elements combine to create the character of the countryside. Important to recognise influences on this character that combine to a sense of place, and set a tract of countryside apart from adjacent areas.	The document contains no targets or indicators.	East of England's landscape character should form a component of the plan baseline and should be considered when proposing new development.	The SA Framework should include an objective on landscape quality.

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<b>The Ipswich Health and Wellbeing Strategy 2011 – 2016</b>			
<p>The vision is to improve the health and wellbeing of the people of Ipswich and support them in adopting a healthy lifestyle</p> <p>Priorities:</p> <p>To develop and implement an action plan to meet the vision</p> <p>Reduce health inequalities</p> <p>Promote healthy lifestyles and healthy communities</p> <p>Collate local information on health and wellbeing issues and to address them</p>	<p>No indicators.</p>	<p>The plan should include an objective for healthy lifestyles for people and the community impacted by the plan; such as recreational facilities, walking paths etc.</p>	<p>The SA Framework should include objectives relating to healthy lifestyles and communities</p>
<b>Ipswich Housing Strategy 2010/11-15/16</b>			
<p>Vision:</p> <p>Everyone in Ipswich should have the opportunity to rent or buy a decent home at the price they can afford, in a sustainable community where they want to live and work</p> <p>Priorities:</p> <p>Improve housing supply and improving neighbourhoods through a mix of high quality, environmentally sustainable homes for sale or rent</p> <p>Improving housing quality and environmental sustainability</p> <p>Supporting and including vulnerable adults, hard to reach groups and all communities</p> <p>Doing the basics better for less</p>	<p><u>Priority 1</u></p> <p>Improving strategic links</p> <p><u>Affordable housing targets:</u></p> <p>To be provided on sites of 0.5hectares or more, or 15 units or more</p> <p>The amount to be provided is 35% and a minimum of 65% of this must be provided as social rented housing</p> <p>Continued supply of new affordable homes</p> <p>Balanced, sustainable communities</p> <p>Balance of large and small affordable homes</p> <p>Target for at least 65% of new affordable homes to rent</p> <p>Meeting gypsy and traveller pitch needs</p> <p>New housing that meets the needs of all communities</p> <p>Right mix of new market, affordable and specialist housing for older people</p> <p>New homes for people with care and support needs, and adapted homes</p>	<p>The plan needs to complement the aims of the strategy and seek to develop sustainable communities.</p>	<p>The SA Framework should include objectives, indicators and targets that address housing issues, e.g. providing an appropriate balance of housing types.</p>

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
	<p>New homes for students in balanced communities</p> <p>Environmental sustainability</p> <p>Improved housing supply through the best use of existing stock</p> <p><u>Priority 3:</u></p> <p>Effective housing and neighbourhood management through partnership working</p> <p><u>Priority 4:</u></p> <p>All housing services to represent good value for money</p> <p>Tenants and residents are involved in decision making</p>		
One Ipswich Everybody Matters Strategy 2008-2010			
<p>We want Ipswich to be a vibrant, prosperous and thriving place. We will address deprivation and inequality in neighbourhoods and develop an economically dynamic and enterprising society so everyone in Ipswich can:</p> <ul style="list-style-type: none"> <li>• be prosperous and have a place to live</li> <li>• be healthy and stay well</li> <li>• achieve their potential and enjoy life</li> <li>• keep safe</li> <li>• have a greater say and better choices</li> <li>• live in friendly and supportive communities</li> </ul> <p>We will:</p> <p>Deliver a long-term investment in community development to respond to important local issues across the town. The One- Ipswich partnership has chosen a project focused approach to deliver our outcomes, and we will seek to exploit and replicate the learning of existing good practice. This will help all the LSP partners by:</p> <ol style="list-style-type: none"> <li>1. Assisting in generating community intelligence.</li> <li>2. Addressing health concerns.</li> </ol>	<p>15,400 additional homes to be provided for (2001 - 2021).</p> <p>An additional 4,710 additional homes to be provided for just outside Ipswich.</p> <p>18,000 new jobs to be provided for (2001 - 2021).</p> <p>Affordable housing to constitute at least 30% of housing supply with an aspiration of 40% of supply if Ipswich housing stress warrants higher provision.</p> <p>Car traffic levels to stabilise at 1999 levels.</p> <p>All major developments to provide at least 10% of their energy requirements via renewable power generation.</p>	<p>The key aims identified within this strategy should be considered within the plan.</p>	<p>The SA should include objectives that focus on improving health, the environment and community involvement.</p>

<b>Regional and Sub-Regional Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
3. Improving the environment. 4. Engaging with young people. 5. Improving access to drug and alcohol treatment, and signposting. 6. Generating community involvement 7. Integrating the voluntary sector			
<b>Ipswich Borough Council Level 2 Strategic Flood Risk Assessment (2011)</b>			
This Level 2 SFRA supersedes the draft level 1 SFRA dated November 2007 and accounts for the presence of recently improved flood defences within Ipswich, as well as for the planned flood defence barrier expected to be operational in 2014.  The SFRA also considers the potential effects of development on local flooding and minor watercourses and identifies mitigation measures including sustainable urban drainage systems (SUDS) and suggests a framework for safe development in flood zones 2 & 3.	No specific targets identified.	The key flood risk baseline data should be used to inform the plan.	The SA should include objectives that address flood risk within Ipswich.
<b>Ipswich Economic Development Strategy 2012 – 2026 DRAFT</b>			
The economic development strategy will focus on job creation and retention, as well as promoting and attracting investment to Ipswich, reflecting core aims in the Council's Corporate Plan – 'Building A Better Ipswich1'.  <u>Vision statement</u> "Ipswich will be an inspiring and exciting town perceived as both an attractive location for investment in business and a centre of excellence for education. Creative people in partnership with dynamic businesses will drive a diverse and innovative urban economy. A sustainable and low carbon Ipswich will enable individuals to flourish, and inhabitants will be notable for their enterprise, ambition, creativity and pride in their town"	There are no specific targets and indicators.	The plan should incorporate objectives included in the economic development strategy.	The SA should include objectives that will support sustainable economic growth.
<b>Ipswich Borough Council Corporate Plan (2012)</b>			
The new corporate plan for Ipswich consists of 6 themes and it reveals that the council's priority is to attract new investment and jobs to Ipswich by	1. A stronger Ipswich Economy:	The Corporate Plan identifies priorities within	The SA should include objectives that support

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>helping to boost private sector jobs and by supporting the construction industry by building much-needed new affordable housing.</p> <p>There are two underlying principles:</p> <p>Underlying principle 1: A Fairer Ipswich:</p> <p>Everything we do will be based on the principles of fairness and participation. We will work to eliminate discrimination, promote equality of opportunity, and foster good relations amongst all the people of Ipswich.</p> <p>Underlying Principle 2: Value for Money:</p> <p>We will constantly seek to improve the efficiency of the Council, with savings used to protect and improve services and to keep down council tax.</p> <p>Themes:</p> <ol style="list-style-type: none"> <li>1. A stronger Ipswich economy</li> <li>2. A safer and healthier Ipswich</li> <li>3. Keeping Ipswich moving</li> <li>4. Quality housing for all</li> <li>5. A greener Ipswich</li> <li>6. A more enjoyable Ipswich</li> </ol>	<p>Develop an Economic Development Strategy with a focus on job retention and creation and to promote and attract investment into Ipswich;</p> <p>Increase both the number and profile of apprenticeships within the business community of Ipswich;</p> <p>Assist small and medium enterprises to deliver training and business support</p> <p>Support skills development and promote educational, business and community engagement.</p> <p>4. Quality housing for all</p> <p>Continue investment to maintain the Decent Homes Standard and achieve the Ipswich Standard by 2014;</p> <p>Increase the delivery of affordable housing by aiming for 35% of all new homes delivered to be affordable, and by keeping our affordable housing policies under review;</p> <p>Work in partnership with Homes and Communities Agency to deliver affordable housing and employment;</p> <p>Work to minimise the impact to local residents of the reduction in the County Council's Supporting People funding to Ipswich Borough Council (e.g. to sheltered housing tenants and homeless people)</p>	<p>Ipswich which should be taken into account.</p>	<p>the economy and address housing issues.</p>
Ipswich Cultural Strategy 2011-2014			
<p>This three year strategy sets out how Ipswich Borough Council will focus on six key objectives to further improve cultural assets while facilitating the development of others.</p> <p>The strategy identifies major improvements, including a refurbishment of Crown Pools. It also highlights big ambitions for the future including a new Centre of Excellence for the arts focussed on the Ipswich Museum and Art School. The success of these will be dependent on winning support from local residents and stakeholders as well as achieving external funding.</p>	<p>Focus activity on key local assets and aim to reduce duplication and improve efficiency through better co-ordination and management of linked services. We will make better use of partnerships and voluntary provision, maximise income and seek external funding where available.</p> <p>Promote the town's cultural facilities and develop its cultural economy to attract more visitors (especially</p>	<p>The strategy identifies the benefit of improving and developing cultural assets which should be considered in the plan.</p>	<p>The SA should include objectives that address the development and improvement of cultural assets within Ipswich.</p>

<b>Regional and Sub-Regional Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<p>The new strategy has six themes with key actions to provide a focus for investment and decision-making over the next 3 years:</p> <ol style="list-style-type: none"> <li>1. Responding to the national pressure on public spend</li> <li>2. Developing the Cultural Economy</li> <li>3. Improving and sustaining what we have</li> <li>4. Increasing participation in cultural activity</li> <li>5. 2012 Olympic Legacy</li> <li>6. Ambitions for the future</li> </ol>	<p>those who stay more than one day) and boost the local economy.</p> <p>Seek to improve our facilities where we can and ensure they are well maintained and run by qualified customer focussed staff.</p> <p>Encourage communities to become involved in the management and maintenance of their local facilities.</p> <p>The Council will work with partners, including the County Council, Nations and Regions East, private providers and the third sector to provide opportunities and a lasting legacy linked to 2012.</p> <p>Secure £10m investment in a new Centre of Excellence for Arts &amp; Culture, combining the existing Ipswich Museum with adjacent buildings: Ipswich Art School; Wolsey Studio and; High Street Exhibition Gallery, to create a truly world class facility and tourist attraction, providing a source of pride and inspiration for the community.;</p> <p>Establish a new sports village focussed on Gainsborough Sports Centre with more sporting facilities including improved football/all weather pitches, cycling facilities etc.;</p>		
<b>Ipswich Environment Strategy 2010</b>			
<p>This overarching Strategy explains how we deliver environmental performance through different areas of the Council's activities and its policies and strategies. This Strategy is not subordinate to other strategies. This Strategy will enable Ipswich Borough Council to improve its environmental performance by identifying and addressing environmental issues that are not covered by other policies and strategies; and by referencing and monitoring environmental actions that are addressed elsewhere.</p>	<p>Seek to continually improve the cleanliness of Ipswich and seek to enhance the town through effective urban design</p> <p>Reduce waste by supporting initiatives that reduce, re-use and recycle</p> <p>Ensure that residents and businesses value the environment and take action to reduce environmental</p>	<p>The plan will address key environmental issues within the Borough.</p>	<p>The SA should include objectives that address the key themes within this strategy.</p>

<b>Regional and Sub-Regional Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<p>This document is driven by the Council's corporate strategy and its community strategy we set our strategic objectives.</p> <p>'Transforming Ipswich' identifies 6 key themes to develop performance:</p> <p>Clean &amp; Green Ipswich Expanding Ipswich Safe Ipswich Strengthening Communities in Ipswich Travel Ipswich Vibrant Ipswich</p> <p>The primary theme for this strategy is Clean and Green Ipswich:</p> <p><i>'We will work with the community to make Ipswich a model urban clean and green place'</i></p>	<p>impact through education, campaigning and enforcement</p> <p>Ensure adequate open spaces and amenity areas are available</p> <p>Protect and enhance biodiversity, by managing, developing and interpreting our valuable natural habitats and sensitive wildlife sites</p> <p>Monitor air, land, water and noise pollution within the Borough and take measures to minimise local pollution consistent with sustainable development principles</p> <p>Reduce carbon emissions by encouraging and supporting initiatives that promote renewable energy and energy efficiency</p>		
<b>Ipswich Town Centre Master Plan 2012</b>			
<p>The Town Centre Master Plan provides a view of what Ipswich Borough Council and stakeholders agree is the way forward to achieve an enhanced town centre in Ipswich. The 15-year plan has an end date of 2027. It complements the adopted Core Strategy and Policies Development Plan Document and other relevant policy documents.</p> <p>The aim is to enhance, remodel and develop the town centre, delivering a programme of regeneration and renewal which builds on the aspirations to be a regional centre for shopping and culture.</p>	<p>The document contains no targets or indicators.</p>	<p>The plan should address regeneration of the Ipswich town centre.</p>	<p>The SA should include objectives that address the redevelopment of the Ipswich town centre.</p>
<b>Ipswich Open Space and Biodiversity Policy/Strategy 2013-2023</b>			
<p>This policy establishes guiding principles for the provision and management of green space within Ipswich Borough, and recommends a strategy for its protection and enhancement so that it can be enjoyed by future generations.</p>	<p>Ensure the provision and management of public open space meets customer needs, now and over the next 10 years.</p> <p>Ensure the natural environment, trees and wildlife is afforded appropriate protection.</p>	<p>The strategy identifies principles for the provision and management of green space which should be taken into consideration.</p>	<p>The SA should include objectives that address the protection and enhancement of biodiversity.</p>

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
<p>Vision statement:</p> <p>'To safeguard, protect and enhance biodiversity and the environment and improve everyone's quality of life by working in partnership with others to ensure that our parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefiting the whole community'</p>	<p>Ensure the Council operates within the law and where possible adheres to best practice.</p> <p>To raise awareness of the benefits and value of good quality, accessible, biodiversity rich public open space.</p> <p>Identify priorities for future investment and thus ensure best use of available resources.</p> <p>Provide appropriate guidance through the planning process to ensure new public open space is appropriately located, of a high quality and meets local needs.</p> <p>Plan for and mitigate the effects of climate change.</p> <p>Improve the quality of the public realm, natural environment and local heritage.</p> <p>Build social cohesion and encourage healthy lifestyles through a well planned and managed 'green space' infrastructure.</p> <p>Create a delivery plan for green infrastructure provision, Ensure any cross boundary provision is properly coordinated and managed and</p> <p>Ensure heritage parks and heritage features within our parks are afforded appropriate protection.</p>		
Tree Management Policy 2010			
<p>The Tree Management Policy will allow the council:</p> <p>To continually develop an integrated approach to tree management that embraces all aspects of the council's tree related activities in a coherent and co-ordinated tree programme.</p> <p>To promote awareness of the value of trees in our environment.</p> <p>To interpret the policy framework.</p> <p>To give direction and guidance to local initiatives both public and private.</p>	<p>No relevant indicators.</p>	<p>The policy identifies the benefits of tree management.</p>	<p>The SA should consider the importance of tree management.</p>

<b>Regional and Sub-Regional Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
<b>Allotment Strategy 2005</b>			
<p>A successful strategy will bring allotments into public focus advertising the benefits for all, resulting in increased lettings and improved standards.</p> <p>This will be done by developing a service in which people can expect good security and facility provision. Increased promotion as an activity for all should encourage people of all backgrounds to develop their skills as new gardeners.</p> <p>The aims of the allotment strategy are:</p> <ul style="list-style-type: none"> <li>to raise the awareness of others to the benefits of allotments for all leading to an increase in the number of plot holders</li> <li>to set a standard for the provision of allotments in Ipswich</li> <li>to improve the standard of service provision</li> <li>to investigate ways to improve the financial position of the service</li> <li>consider the demand for allotments both now and in the future</li> <li>review and propose changes if required to the provision and distribution of allotment land in Ipswich.</li> </ul>	No relevant indicators.	The aims of this strategy should be taken into account in the plan.	The SA should consider the public benefits identified within this strategy.
<b>The draft Ipswich Strategic Housing Land Availability Assessment update 2013 (SHLAA)</b>			
<p>The Strategic Housing Land Availability Assessment (SHLAA) is a key component of the evidence base underpinning the Council's Local Plan, by identifying a list of sites which may be suitable and available for housing development.</p> <p>The study identifies sites with potential for housing development but the study does not make any decisions about site allocations.</p>	No specific targets of relevance in this plan or programme.	The SHLAA identifies potentially suitable housing sites in the Borough and highlights key baseline all of which should be taken into account.	The SA needs to include objectives that relate to the choice, quality and diversity of housing and also ensuring that such housing is available to all communities and sectors of society.
<b>Ipswich Housing Market Area Strategic Housing Market Assessment 2012</b>			
This document updates the 2008 Strategic Housing Market Assessment (SHMA) for the Ipswich Housing Market Area, which comprises: the districts of Babergh, Mid Suffolk and Suffolk Coastal, and the Borough of	Currently, there is a backlog of over 4,000 households in need of a suitable and affordable home in the Ipswich	The Plan will include objectives to maximise affordable housing to meet	The SA Framework needs to include objectives that relate to

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
Ipswich. This update is a hybrid between a straight- forward review of the data and an entirely new assessment.	<p>HMA.</p> <p>The supply of new affordable homes and the reuse of existing stock are not sufficient.</p> <p>In order to address this shortfall, 70% of all new homes in the Ipswich HMA currently being planned would need to be affordable.</p> <p>The needs are greatest in Ipswich with an annual need for at least 584 more homes to be affordable. Need within Suffolk Coastal is the next greatest at 355, in Mid Suffolk 229 are required and 134 more affordable homes are needed each year in Babergh.</p>	current and future needs of residents.	the choice, quality, diversity and affordability of housing.
Suffolk Growth Strategy March 2013			
<p>The growth strategy provides a broad framework and vision on how to encourage business to be successful. It provides opportunities for growth in different sectors of the economy in Suffolk.as well as identifies a potential to create thousands of additional high value and highly skilled jobs in the county.</p> <p>The strategy aims to address the barriers to growth and sets out objectives associated with inward investment, economic growth, improvement of skills and education and improvement of infrastructure.</p>	<p>Increase the number of apprenticeship starts (at all ages) by at least 33% by 2015/16, from 6,272 currently to 8,342; and to increase the number of 16-18 year olds in apprenticeships by 50% from 1,613 currently to 2,477.</p> <p>The vision is for Superfast Broadband (both fixed andmobile), offering typical speeds of 100Mbps, to everyone (100% of homes and small business) in Suffolk by 2020. This investment will bring benefits including economic growth of up to 20% over 15 years, and the creation of up to 5,000 new full-time jobs.</p>	The county, district and borough councils have agreed the principal locations for economic growth. In particular, these comprise our “best offer” to companies planning to invest in our growth sectors. One of these locations is Greater Ipswich and key development sites include Ransomes Europark Expansion, Ravenswood, Futura Park, Former Sugar Beet Factory, Adastral Park Expansion. The strategy also includes strategic	The SA needs to include objectives that relate to economic growth, improvement of educational attainment and employability, inward investment.

Regional and Sub-Regional Plans			
Key Objectives Relevant to Plan and SA	Key Targets and Indicators Relevant to Plan and SA	Implications for Plan	Implications for SA
		improvements of A12.	
Ipswich Employment Land Availability Report 2012			
Extensive surveys are carried out annually for main employment areas, as identified through saved policies of the 1997 adopted Local Plan and the Proposals Map. Sites with current planning permissions for employment use are also monitored annually and updated in the report.	No specific indicators or targets of relevance in this plan or programme.	The objective of the survey is to monitor the supply of employment land to provide accurate and up-to-date data for the Local Plan evidence base and to measure the effectiveness of policies.	The SA needs to include objectives that relate to economic growth and appropriate use of vacant business units.
Ipswich Development and Flood Risk SPD			
Guidance to facilitate the planning permission process is provided in SPD particularly with regards to flood risk vulnerability and flood zone 'compatibility'. Flood resilient measures are also included as part of the guidance.	No specific indicators or targets of relevance in this plan or programme.	The plan should address flood risk issues in areas of Flood zone 2 and Flood zone 3.	The SA includes an objective directly related to flood risk. The guidance will be used in the assessment process to determine the significance of negative effects associated with flood risk.
Haven Gateway Green Infrastructure Study 2008			
The strategy appraises and identifies standards for delivering enhancements to the existing ANG network. The criteria for defining Accessible Natural Greenspace (ANG) were developed. The existing ANG provision was appraised to identify deficiencies in provision based on four accessible natural greenspace standards (as developed by English Nature [now Natural England] in 2003, adapted by the Town and Country Planning Association and agreed by the Steering Group).	The following set of standards (based on those promoted by the Town and Country Planning Association) has been used.  People should have access to: <ul style="list-style-type: none"> <li>• 2ha+ of ANG within 300m of home – this has been termed the Neighbourhood Level</li> <li>• 20ha+ of ANG within 1.2km of home – the District</li> </ul>	The plan should ensure that sufficient land is allocated for greenspace/open space and where necessary access to improved.	The SA should take into consideration the proximity to open space and green infrastructure of new developments within the appraisal against the SA objectives.

<b>Regional and Sub-Regional Plans</b>			
<b>Key Objectives Relevant to Plan and SA</b>	<b>Key Targets and Indicators Relevant to Plan and SA</b>	<b>Implications for Plan</b>	<b>Implications for SA</b>
	Level • 60ha+ of ANG within 3.2km of home – the Sub-regional Level • 500ha+ of ANG within 10km of home – the Regional Level		
<b>Open Space and Biodiversity Policy / Strategy 2013 - 2023</b>			
<p>The Open Space and Biodiversity Policy examines the provision of open space in terms of its quantity, quality, accessibility and management, identifying opportunities to increase supply, improve standards and satisfy demand. The Open Space and Biodiversity Policy underlines the importance of this land asset in meeting social and environmental needs, providing a very cost effective way of delivering a variety of benefits across all sections of the community and serving as a 'quality of life' indicator.</p>	<p>In terms of the provision of shading and greening, Ipswich Borough currently has approximately 12% tree canopy cover. Currently Ipswich does not have a time related tree canopy cover goals. A realistic standard to aim for in Ipswich is 22% by 2050.</p>	<p>The plan should ensure that sufficient land is allocated for greenspace/open space and where necessary access to improved.</p>	<p>The SA should take into consideration the potential loss of open space and canopy cover due to new development within the appraisal against the SA objectives.</p>
<b>Haven Gateway Water Cycle Study Stage 2 Report 2009</b>			
<p>The study was commissioned in order to ensure that water supply, water quality, sewerage and flood risk management issues are properly addressed. The Water Cycle Study considers the consequences of the allocation of development to reflect the impact on the water cycle.</p>	<p>No specific indicators or targets of relevance in this report. Flood risk and water quality issues have been identified and should be taken into consideration.</p>	<p>To be used as guidance for flood risk and water quality management.</p>	<p>To be used as guidance for flood risk and water quality management.</p>
<b>Heritage in Local Plans: How to create a sound plan under the NPPF</b>			
<p>This is a guide to local authorities from English Heritage on how to achieve the objectives of the NPPF for the historic environment and thereby pass the test for a sound local plan. To achieve the objectives of the NPPF it is necessary to consider the historic environment from the outset. Consideration should flow through from compiling the evidence base to policy, implementation and monitoring.</p>	<p>No specific indicators or targets of relevance in this guidance.</p> <p>Sources of evidence include:</p> <p>National Heritage List for England            Historic Environment Record            Conservation Area Appraisals and Management Plans</p>	<p>To be used as guidance for the conservation and protection of the historic environment.</p>	<p>To be used as guidance for the conservation and protection of the historic environment.</p>

**Regional and Sub-Regional Plans**

**Key Objectives Relevant to Plan and SA**

**Key Targets and Indicators Relevant to Plan and SA**

**Implications for Plan**

**Implications for SA**

Local Lists  
National and local 'Heritage at Risk' registers  
Historic characterisation assessments  
World Heritage Site Management Plans  
In-house and local (e.g. civic societies, local history groups, neighbourhood consultations) knowledge and expertise in built conservation, archaeology and urban design)  
The heritage assets, historic areas and landscapes themselves

# Appendix B

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## Baseline Data

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## B. The Sustainability Baseline and Key Sustainability Issues

### B.1 Population

The following baseline indicators have been used to identify key population trends and characteristics:

- Total population (2011 Census and Neighbourhood Statistics<sup>1</sup>).
- Projected population growth to 2035 (Office for National Statistics Local Profiles<sup>2</sup>)
- Area of Ipswich Borough (Office for National Statistics Local Profiles).
- Population density (Office for National Statistics Local Profiles).
- Age structure of the population (Office for National Statistics Local Profiles and 2011 Census).
- Mean household size (Strategic Housing Market Assessment Ipswich Borough Council, Data Review June 2012).
- Percentage of single pensioner households (Neighbourhood Statistics<sup>3</sup>).
- Ethnic groups represented in the population (Office for National Statistics Local Profiles).

Ipswich has the highest population of all the districts within Suffolk. The population of the Borough has increased between 2010 and 2011 from 128,300 people to 133,400, an increase of 5,100 (representing 4.2%). Table B-1 below indicates the trend in population growth from 2001 to 2011. Table B-1 shows a relatively high level of growth across the Borough which is an indication why such a large number of new homes is considered necessary within Ipswich. The increase in population resulted from a mix of natural change (births – deaths) and net migration.

**Table B-1 Population Change**

Date	Population Estimate	Difference on previous year
2011*	133,400	+5,100
2010	128,300	+1,700
2009	126,600	+1,200
2008	125,400	+2,300
2007	123,100	+800
2006	122,300	+700

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1

<http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?adminCompAndTimeId=28121%3A345&a=7&b=277113&c=ipswich&d=13&r=1&e=13&f=26822&o=131&q=487927&i=1001x1003x1004x1005&l=1818&m=0&s=1345628607823&enc=1>

2 <http://www.neighbourhood.statistics.gov.uk/dissemination/Info.do?page=analysisandguidance/analysisarticles/local-authority-profiles.htm>

3

<http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=277113&c=ipswich&d=13&e=16&q=487927&i=1001x1003x1004&o=1&m=0&r=1&s=1345632289120&enc=1&dsFamilyId=135>

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Date	Population Estimate	Difference on previous year
2005	121,600	+2,100
2004	119,500	+1,400
2003	118,100	+700
2002	117,400	+200
2001*	117,200	-

\*Populations are not estimates they are from the 2011 and 2001 Census

Source: Neighbourhood Statistics and the 2001 and 2011 Census

It is estimated that between 2010 and 2035, the population of the Borough will increase by 20.8% (Suffolk - 18.6%).

The Borough of Ipswich covers an area of 39km<sup>2</sup>. In 2010, the population density of Ipswich was 3,254 people per km<sup>2</sup>, significantly higher than the population density for Suffolk (189 people per km<sup>2</sup>) and that for England (401 people per km<sup>2</sup>). The Borough's fairly high population density trend is anticipated to continue to 2035 based on projected population growth rates.

According to the 2011 Census, the population of the Borough continues to be heavily skewed to the 25-29 age cohort. Figure B-1 presents the age structure of the Borough based on 2011 mid-year statistics.

**Figure B-1 Population Structure of Ipswich**

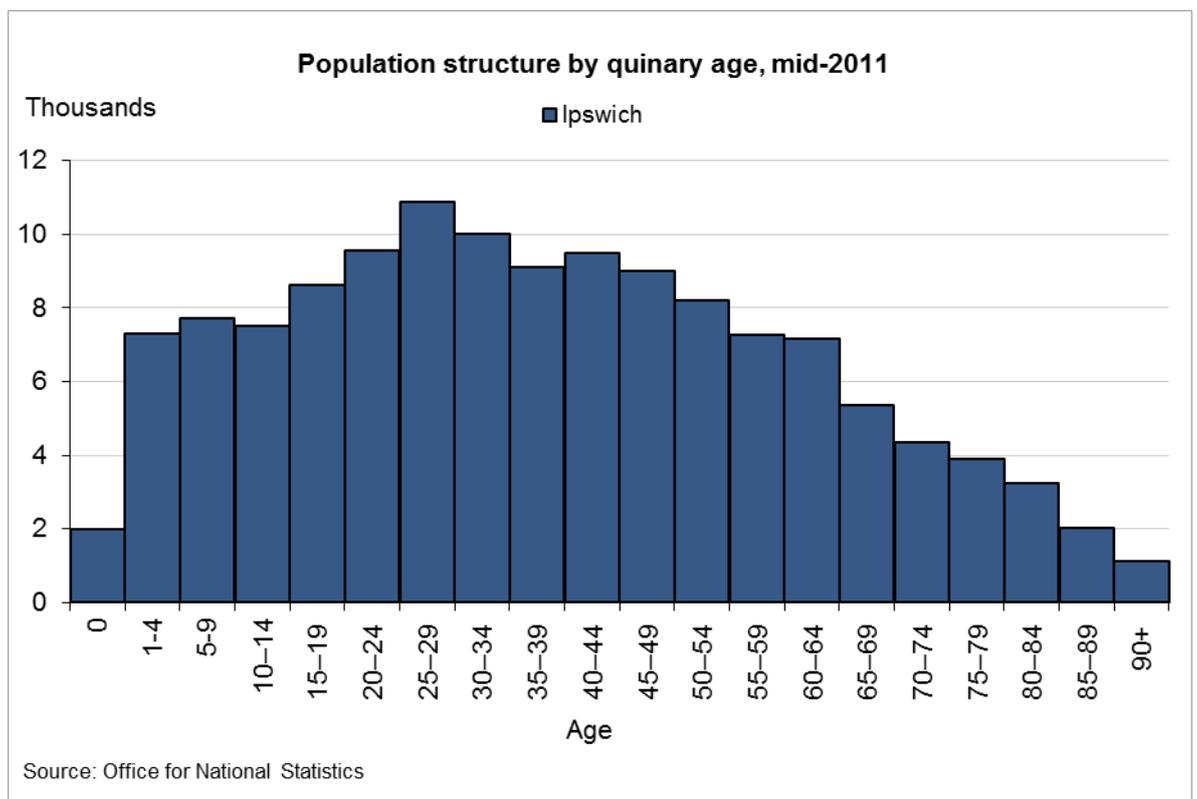
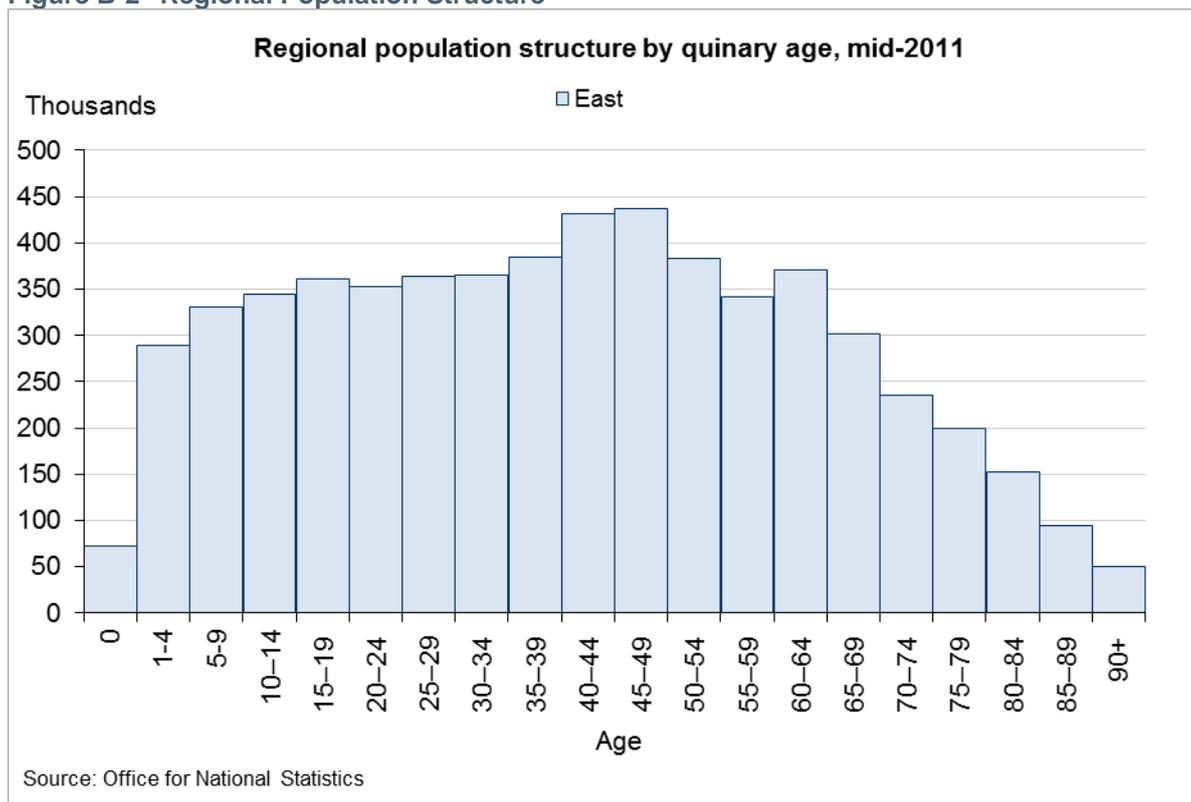


Figure B-2 presents the East of England regional age structure based on the 2011 mid-year statistics.

**Figure B-2 Regional Population Structure**



The average household size in the East of England stood at 2.29 people per household in the 2011 Census and it is anticipated it will be about 2.17 by 2033 (Strategic Housing Market Assessment Ipswich Borough Council, Data Review June 2012). By 2033, the most common household type will be one person living alone; these single people will constitute nearly 50% of all households, with the actual number nearly doubling over the next twenty-five years. The number of lone parent households will have increased substantially too. Couple households with one or more other adult will see a decline of 20% as will “Other households” (includes lone parent households with all children non dependant) which are predicted to decrease by a third. Ipswich has a relatively multicultural population. 2009 data indicated that 86.6% of the population of Ipswich were white which is slightly lower than that for the East of England (90.0%) and England (87.5). Asian / Asian British are the main ethnic minority within Ipswich, representing 6.3% of the population (Population Estimates by ethnic group, Office for National Statistics).

### Data Gaps and Uncertainties

- Population and household forecasts vary according to the assumptions made, but tend to be upwards. The projections used for this assessment are based on data and models included in Strategic Housing Market Assessment Ipswich Borough Council, Data Review June 2012 and Ipswich housing market area population and household projections: an analysis of demographic change (September 2013).

### Key Issues and Opportunities

- There are potential challenges that could arise in the future relating to the type and tenure of housing provision on offer in the Borough.
- There is a high percentage of people under the age of 34 in Ipswich, which may have implications for provision of educational facilities, recreational facilities etc.

- Asian/Asian British are the main ethnic minority and therefore there needs to be appropriate services provision for all members of the population in terms of education, housing etc.
- There are opportunities to improve the supply of education, health and other community facilities in the Borough.

## B.2 Education and Qualifications

The following baseline indicators have been used to characterise levels of education and attainment in the Borough:

- Percentage of pupils achieving five or more GCSEs at Grades A\* - C (including Mathematics and English) or equivalent (Office for National Statistics Local Profiles).
- Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles).
- Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles).
- Most Deprived LSOAs for education, skills and training (ONS 201 Indices of Multiple Deprivation)

During the 2009 – 2010 school year in Ipswich 48.8% of pupils at the end of Key Stage 4 were achieving 5+ A\*-C including English and Mathematics, which is less than the average for the East of England (56%) and England (55.1%).

Levels of educational attainment show a clear link to levels of affluence in later life, as access to employment improves with academic success. In 2010, there were 9,000 people in Ipswich with no qualifications; accounting for 11% of the population aged 16 to 64 (this is 1.2% lower than figures recorded in 2007). Those with no qualifications in the East of England accounted for 10.8% of the population and within England 11.1%. Therefore this shows that Ipswich's performance is average. In 2010, 31.9% of the population aged 19 - 64 (male) / 16 - 59 (female) had at least a Level 4 NVQCL1 qualification not significantly different from the East of England region.

Low skill levels, and the mismatch between supply and demand has long been a barrier to growth in Suffolk. According to the Suffolk Growth Strategy many young people have a limited understanding of work, the economic opportunities in Suffolk and how to be well prepared to secure employment. Employers state that one of the most critical factors to their business is being able to recruit people with the right personal skills for employment: literacy, numeracy, responsibility, communication and problem solving abilities.

Gipping, Priory Heath, Whitehouse, Castle Hill, Stoke Park, Rushmere Sprites and Gainsborough wards have LSOAs that fall within the 20% most deprived for education skills and training (ONS 2010 Indices of Multiple Deprivation).

It should be noted that Ipswich is home to University Campus Suffolk and Suffolk New College.

### Data Gaps and Uncertainties

- There are no significant gaps or uncertainties identified for this topic.

### Key Issues and Opportunities

- Educational attainment across Ipswich is below the national average. Although the percentage population holding recognised qualifications is average across Ipswich, it is considered that low skill levels and the mismatch between supply and demand of qualified young people is one of the main barriers to economic growth.

- There is a need to improve educational attainment in the Borough. By improving levels of educational attainment there could be wider social benefits and improvements to the local economy. However, there are limitations as to how far the DPDs could contribute to improving educational attainment.

## B.3 Health

The following baseline data has been used to identify key trends:

- Percentage of the resident population who consider themselves to be in good health (2011 Census).
- Life expectancy at birth for males and females for the period 2008 – 2010 (Office for National Statistics Local Profiles).
- Distribution of and GPs and dentists (Ipswich Borough Council).
- Distribution of sports facilities (Active Places<sup>4</sup>).
- Percentage of people participating in regular sport or exercise (defined as taking part on at least 3 days a week in moderate intensity sport and active recreation for at least 30 minutes continuously in any one session) (Sport England Active People Survey 5).
- Conception rate of under-18 year olds (per 1,000) (Office for National Statistics Local Profiles).
- Most Deprived LSOA for health deprivation and disability (ONS 201 Indices of Multiple Deprivation)
- Play and open space quality, quantity and accessibility (Ipswich Open Space, Sports and Recreation Facilities Study 2009)

The health of people in Ipswich is mixed compared with the England average. Deprivation is higher than average and about 5,600 children live in poverty. In addition, life expectancy is 8.6 years lower for men in the most deprived areas of Ipswich than in the least deprived areas. Over the last ten years, all cause mortality rates show no clear trend and the early death rate from heart disease and stroke has fallen and is similar to the England average. Priorities in Ipswich include narrowing health inequalities and reducing early deaths (e.g. from cancer), ensuring children get the best start in life and supporting older people to remain independent and active.

Life expectancy from birth for females in Ipswich (82.5 years) is slightly less than that for the East of England (83.2 years). However, there is no significant difference in life expectancy at birth for males in Ipswich and the East of England. Table B-2 presents these findings.

**Table B-2 Life Expectancy at Birth 2008 -2010**

	2005-2007		2006-2008		2007-2009		2008-2010	
	Males	Females	Males	Females	Males	Females	Males	Females
Ipswich	78.0	82.7	78.0	82.7	78.1	82.7	78.2	82.5
East of England	78.7	82.6	78.9	82.7	79.3	83.0	79.6	83.2
England	77.7	81.8	77.9	82.0	78.3	82.3	78.6	82.6
Suffolk	79.2	83.1	79.4	83.4	79.6	83.5	79.9	83.6

Source: Neighbourhood Statistics, Office for National Statistics

<sup>4</sup> <http://www.activeplaces.com/Index.asp?Authorise=true>

At the time of the 2011 Census, 45.6% of the Ipswich Borough considered themselves to be in very good health, compared to 47.2.% in the East of England and 47.2% in England and Wales. This subjective data indicates that the health of the Borough population is slightly below regional and national levels.

The teenage pregnancy rate in the Ipswich Borough in 2007 was 48.9 per 1000, compared to 33.1 per 1000 across the East of England and 41.7 per 1,000 in England as a whole. This represents an increase from 44.0 per 1000 in 2006.

Alexandra, Westgate, Whitton, Gainsborough, Gipping and Stoke Park wards all have LSOAs within 20% of the most deprived for health deprivation and disability.

The large amount of open space in the surrounding districts and the presence of parks within the Ipswich Borough provide an excellent recreational resource for the population that should be maintained / enhanced to secure health benefits. According to the Ipswich Open Space, Sports and Recreation Facilities Study 2009 overall provision of open space sites in Ipswich is considered to be very good especially in relation to parks. However, issues with accessibility and locational deficiency were believed to exist, particularly in the north east of the Borough. A number of sites are deemed to lack character, such as on Bramford Lane.

Sports facilities across the Borough are found in and around Ipswich town centre and at the main sports centres. Research from Sport England indicates that 14.5% of people in Ipswich Borough engage in regular sport or exercise, higher than the 13.6% who do so in Suffolk but lower than the 16.3% national figure (Sport England, Active People Survey 5 (2010/11)).

The quality and quantity of indoor sports facilities was generally thought to be good. However, there are some notable issues in terms of the 'tired' condition of Crown Pools and the lack of a two court basketball hall with spectator seating and potentially a 50 metre swimming pool for elite swimming development. The leisure centres are generally perceived to be well used although there are car parking issues (Ipswich Open Space, Sports and Recreation Facilities Study 2009).

### Data Gaps and Uncertainties:

- Percentage of residents who are happy with their neighbourhood as a place to live.

### Key Sustainability Issues and Opportunities:

- Life expectancy from birth for males is slightly lower than the national average and life expectancy from birth for females is slightly higher than national averages. Therefore there is a need to reduce the incidence of diseases and health inequalities.
- Levels of teenage pregnancy are higher than regional and national levels and have implications for health service provision, housing and educational attainment.
- There are opportunities to improve the health of the Borough through the provision of new open spaces and improving the conditions of some of the recreation facilities.
- Health improvements would also benefit the local economy and would enhance overall quality of life in the Borough.
- Opportunities should also be sought to encourage walking and cycling.

## B.4 Crime

The following baseline data has been identified:

- Crime rates per 1000 of the population for key offences including burglary (Office for National Statistics Local Profiles).
-

- Proportion of people experiencing hate crime (State of Ipswich Report May 2011)

30% of all the crime in Suffolk happens in Ipswich and 10% of all the crime in Suffolk happens in the Town Centre of Ipswich as a result of the night time economy. Also shoplifting has increased in Ipswich by 102 (6.8%) offences from 2009/10 to 2010/11. This appears to have been an ongoing trend up to and during the recession, although there is no robust evidence of a direct correlation. Thefts from motor vehicles have increased over the same period by 261 incidents (33.4%).

Ipswich also has the highest prevalence of organised crime in Suffolk including people trafficking, drug dealing and prostitution. Anti-social behaviour also forms a large percentage of crime incidents in Ipswich in June 2012 (State of Ipswich Data, Ipswich Borough Council).

The proportion of people experiencing hate crime, based on race and religion, has increased in recent years. Hate crime based on religion has increased 4 fold between 2008 and 2009 while the incidents reported under disability and sexual orientation have maintained at a steady level.

In 2008/09 the overall crime rate<sup>5</sup> in Ipswich (71.2) was significantly higher than county (37.4), regional (40.4) and national levels (49.7). However, this reduced to 59.5 in 2009/2010 and 58.2 in 2010/11. Table B-3 presents the recorded crime and notifiable offences in Ipswich (per thousand persons) for 2010/11.

**Table B-3 Recorded Crime and Notifiable Offences (per thousand persons)**

2010/11	Violence Against the Person	Wounding or Other Act Endangering Life	Other Wounding	Harassment Including Penalty Notices for Disorder	Common Assault	Robbery	Theft from the Person	Criminal Damage Including Arson	Burglary in a Dwelling	Burglary Other than a Dwelling	Theft of a Motor Vehicle	Theft from a Motor Vehicle
<b>Ipswich</b>	26	1	9	8	6	1	1	20	4	6	2	8
<b>East of England</b>	12	0	5	3	3	1	1	11	4	4	2	5
<b>England</b>	15	0	6	3	4	1	2	12	5	5	2	6

Source: Notifiable Offences Recorded by the Police, Home Office 2010/11

## Data Gaps and Uncertainties

- Percentage of people who feel safe in the place where they live.
- Percentage of people who feel their area is safe with low levels of crime and disorder.

## Key Sustainability Issues and Opportunities

- 30% of all the crime in Suffolk happens in Ipswich and 10% of all the crime in Suffolk happens in the Town Centre of Ipswich as a result of the night time economy. Ipswich also has the highest prevalence of organised crime in Suffolk including people trafficking, drug dealing and prostitution. Anti-social behaviour also forms a large percentage of crime incidents in Ipswich in June 2012.
- There is a need to tackle anti-social behaviour and crime rates should be further reduced to enhance overall quality of life in Ipswich. This could be achieved through incorporating safety by design principles into new development and ensuring appropriate housing mixes are adopted. In addition, generally providing improved employment and

<sup>5</sup> British Crime Survey Comparator shows the overall crime rate per thousand persons.

educational opportunities for the local population could also contribute to improve crime rates.

- There is a need to tackle hate crime rates in the Borough. This is likely to be achieved in the long term through improvement of overall education levels and opportunities for employment. However, there are limitations as to how far the DPDs could contribute directly to reducing the hate crime levels.
- Access to sports facilities should be enhanced. This could have associated health benefits.

## B.5 Water

The following baseline indicators have been used to characterise the water environment in the Borough:

- River catchment areas (Environment Agency East Suffolk Catchment Flood Management Plan, 2009).
- Historic flood events (Ipswich Borough Council Strategic Flood Risk Assessment 2007).
- Distribution of areas at risk of fluvial flooding (Environment Agency Flood Map<sup>6</sup>) and 2010/11 Annual Monitoring Report, Ipswich Borough Council).
- Number of planning applications granted permission contrary to Environment Agency advice (2010/11 Annual Monitoring Report, Ipswich Borough Council).
- Water and groundwater quality (Environment Agency<sup>7</sup>)
- Flood risk, water quality and water supply (Water Cycle Study Report Stage 2, 2009)

Water is an essential resource required for both domestic and industrial use. The Borough lies within the 'East' catchment area. The key watercourses in the Borough are the River Gipping and Belstead Brook which both flow into the River Orwell (Environment Agency River East Suffolk Catchment Flood Management Plan).

The Environment Agency has identified a risk of flooding on lands adjacent to the River Gipping, Belstead Brook and the small watercourse located within the northern part of the Northern Fringe area 'Westerfield Watercourse' (Environment Agency's online Flood Map). Westerfield Watercourse flows westwards from Westerfield village towards the Gipping at Claydon and Areas of undeveloped land including the Council's Millennium Cemetery in the North of Ipswich fall within its catchment.

The Environment Agency was advised of 33 applications in Ipswich where flood risk or water quality was an issue. Of these, 20 were approved, 4 were refused, 7 were withdrawn and decision is still pending on 2 applications. No applications were approved contrary to the Environment Agency's advice (2010/11 Annual Monitoring Report, Ipswich Borough Council).

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<sup>6</sup> [http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=616500.0&y=244500.0&topic=floodmap&ep=map&scale=9&location=Ipswich,Suffolk&lang=\\_e&layerGroups=default&distance=&textonly=off#x=616500&y=244500&lg=1,&scale=8](http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=616500.0&y=244500.0&topic=floodmap&ep=map&scale=9&location=Ipswich,Suffolk&lang=_e&layerGroups=default&distance=&textonly=off#x=616500&y=244500&lg=1,&scale=8)

<sup>7</sup> [http://maps.environment-agency.gov.uk/wiyby/wiybyController?topic=groundwater&layerGroups=default&lang=\\_e&ep=map&scale=8&x=616500&y=244500#x=616500&y=244500&lg=1.&scale=7](http://maps.environment-agency.gov.uk/wiyby/wiybyController?topic=groundwater&layerGroups=default&lang=_e&ep=map&scale=8&x=616500&y=244500#x=616500&y=244500&lg=1.&scale=7)

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Ipswich Borough Council's Strategic Flood Risk Assessment indicates that major surge tides occurred in 1236, 1287, 1613, 1619, 1762, 1894, 1904, 1905, 1927/8, & 1938. However, these would not have caused great damage as town's marshes were not built on. Flood defences built between 1971 and 1983 prevented serious surge tide flooding on 2/3 January 1976, 11/12 January 1978 and 1 February 1983. The most recent severe fluvial events were in 1947 and 1939. These were partly caused by flood debris that obstructed the old "Seven Arches Bridge" at London Road. The current replacement bridge is single span and no longer obstructs the flow.

## Data Gaps and Uncertainties

- Daily domestic water use (per capita consumption, litres). Although currently there are no issues with regards to water supply (Water Cycle Study Stage 2 Report), additional investigation and modelling with detailed site allocations may be required to establish wastewater infrastructure limits.

## Key Sustainability Issues and Opportunities

- New developments and households within the Borough should be encouraged to minimise water use and to re-use rainwater where possible i.e. grey water recycling systems. Discussions regarding water resources availability for new developments should be undertaken with Anglian Water.
- Areas at risk from flooding should be protected from development that would increase that risk. New development should be encouraged to use Sustainable Drainage Systems (SuDS) to manage runoff and further reduce flood risk.
- It should be ensured that groundwater quality is protected particularly during any construction works.

## B.6 Soil and Land Quality

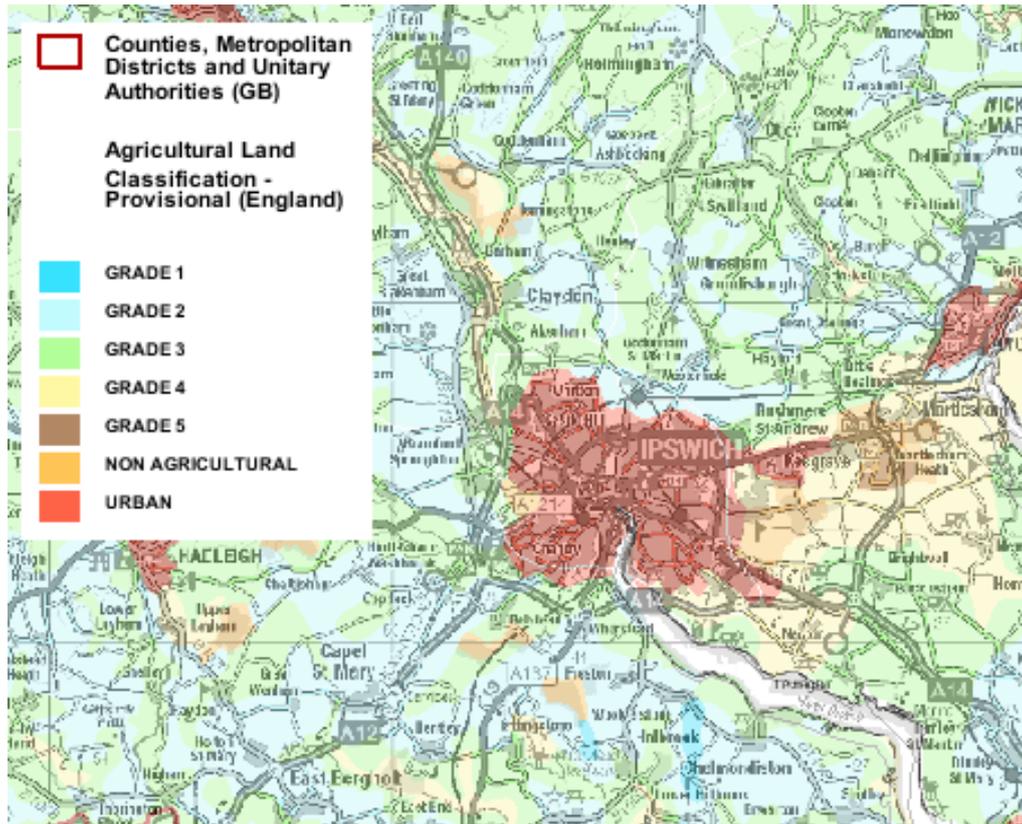
The following baseline indicators have been used to characterise the soil and land quality conditions across the Borough:

- Distribution of best and most versatile agricultural land ([www.magic.gov.uk](http://www.magic.gov.uk)).
- Amount (hectares) of previously developed land available (Office for National Statistics Local Profiles).
- Density of new development (Annual Monitoring Report 2011-2012)

Most of the Borough is covered by urban development. However, Figure B-3 indicates that the undeveloped areas within the Borough lie predominantly on Grade 2 Agricultural Land. Grade 2 Agricultural Land is very good quality agricultural land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than Grade 1. Grade 2 Agricultural Land is also classed as best and most versatile land.

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Figure B-3 Agricultural Land Classification



Source: [www.magic.gov.uk](http://www.magic.gov.uk)

In 2009 there were 130 hectares of land that were unused or may be available for redevelopment in Ipswich. This reflects the high density urban environment of the Ipswich Borough. Table B-4 presents the results.

Table B-4 Previously-developed land

	Vacant land (ha)	Vacant buildings (ha)	Derelict land and buildings	Land currently in use with known redevelopment potential (ha)	Land that is unused or may be available for redevelopment (ha)
<b>Ipswich</b>	20	30	0	20	130
<b>East of England</b>	1,380	280	1,680	1,590	6,820
<b>England</b>	13,570	4,040	15,730	11,220	61,820

Source: Department for Communities and Local Government (DCLG)

Out of 219 dwelling units completed within new build developments between April 2011 and March 2012:

- 0 were developed at less than 30 units per hectare (0% of units)
- 110 were developed at between 30 and 50 units per hectare (50% of units)
- 109 were developed at over 50 units per hectare (50% of units).

The average net density of land covered by the 219 units is 54.1 units per hectare.

There are some sites in Ipswich identified as potentially being contaminated, mainly associated with existing or former industrial areas. There are also a number of historic landfill sites across the Borough, primarily located within the urban area. Contamination on development sites is dealt with through the development management process. An example of a contaminated site which has been redeveloped successfully for its current use is the former Crane's factory site.

## Data Gaps and Uncertainties

- There are no significant gaps or areas of uncertainty for this topic.

## Key Sustainability Issues and Opportunities

- Undeveloped areas within the Borough area are located on Grade 2 Agricultural Land. This is considered to be the best and most versatile agricultural land.
- Opportunities should be sought to include allotment space within the site allocations.
- Where appropriate, opportunities should be sought to implement appropriate remediation and verification measures of contaminated land.

## B.7 Air Quality

The following baseline indicators have been used to identify environmental conditions and key trends:

- Number and distribution of Air Quality Management Areas (AQMAs) (Air Quality Archive<sup>8</sup>)

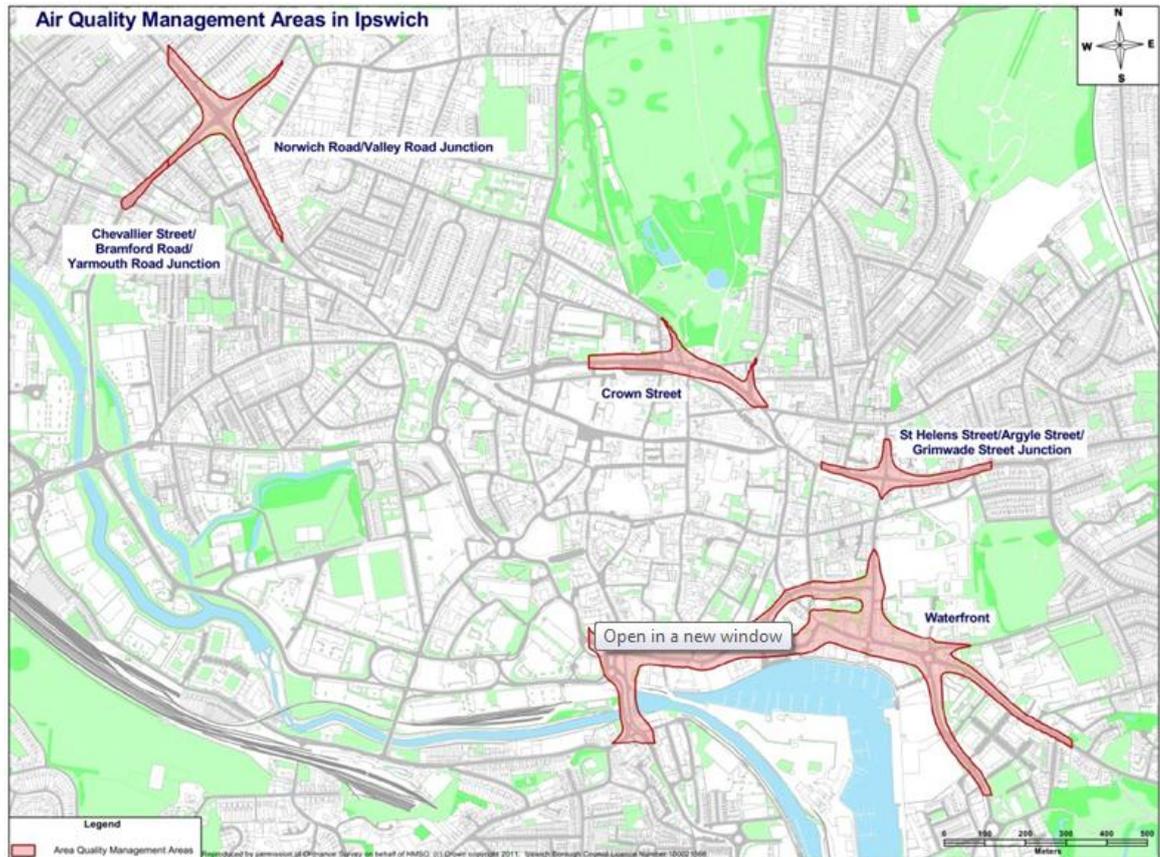
Air quality affects the state of the natural environment and has implications for human health. AQMAs are designated when local authorities have identified locations where national air quality objectives are unlikely to be achieved. There are four AQMAs within the Ipswich Borough and all have been declared for or levels of NO<sub>2</sub>. Their locations are presented on Figure B-4.

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<sup>8</sup> [http://aqma.defra.gov.uk/aqma-details.php?aqma\\_id=442](http://aqma.defra.gov.uk/aqma-details.php?aqma_id=442)

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Figure B-4 Air Quality Management Areas in Ipswich



The main source of air pollution in the Borough is road traffic (2010 Air Quality Detailed Assessment for Ipswich Borough Council). Ipswich continues to get exceedances of the annual average objective level for Nitrogen Dioxide in the AQMAs which may result in potential designation of additional AQMAs or extension to the existing designated area at Crown Street/St. Helen's Street.

Issues relating to carbon dioxide emissions are addressed in Section B.8.

## Data Gaps and Uncertainties

- No of days of air pollution and dwellings affected.

## Key Sustainability Issues and Opportunities

- There are four Air Quality Management Areas (AQMA) within the Ipswich Borough, all of which are designated for NO<sub>2</sub> levels. All of the AQMAs are located within urban Ipswich. Opportunities should be sought to promote the use of public transport, walking and cycling.
- The air quality impacts of additional traffic on the AQMAs must be assessed and strategies for limiting adverse impacts on air quality identified.

## B.8 Energy and Climate Change

The following baseline indicators have been used:

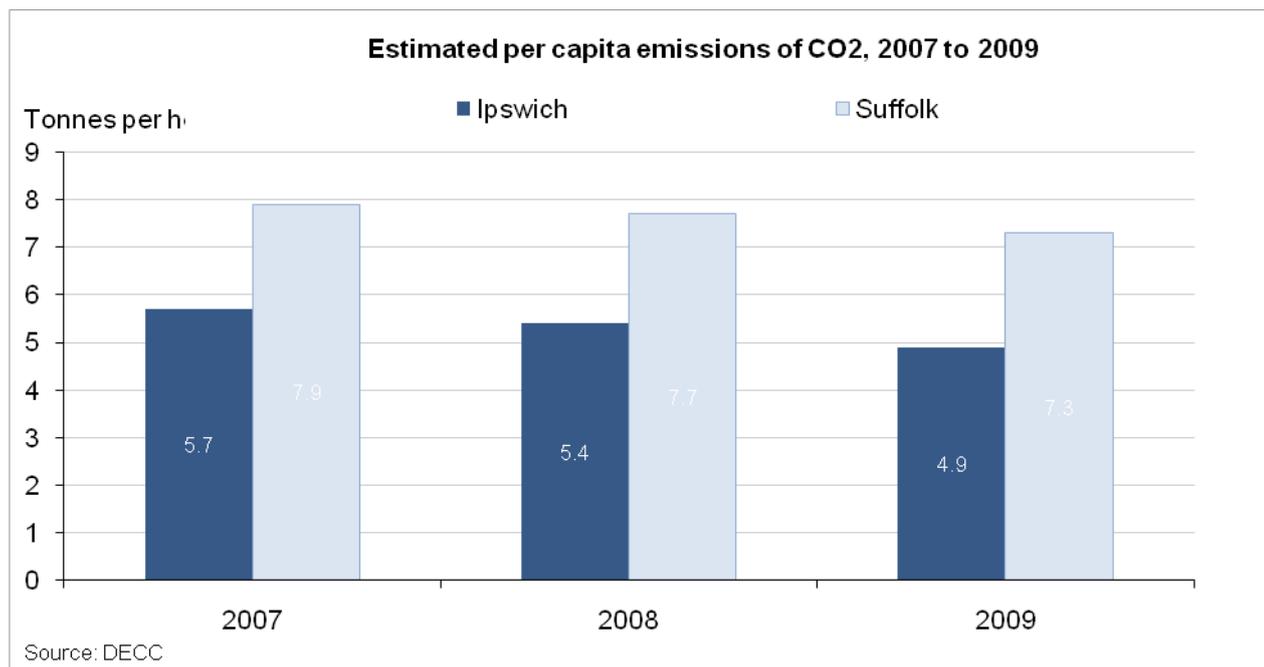
- Total carbon dioxide (CO<sub>2</sub>) emissions per capita (DECC).
- Annual average domestic gas and electricity consumption per meter (Office for National Statistics Local Profiles).

- All energy consumption by sector (Office for National Statistics Local Profiles and DECC).
- Applications for renewable energy developments (2010/11 Annual Monitoring Report Ipswich Borough Council).

Although climate change is a global phenomenon, action to avoid its most serious effects and to minimise the emission of greenhouse gases needs to occur at a local level. The Borough will not be immune to the impacts of climate change, either directly or as a result of policy responses at the national and international levels.

In 2009, the estimate of CO<sub>2</sub> emissions for Ipswich was 4.9 tonnes per capita. This also represents a 0.8 tonnes per capita reduction since 2007. When compared with CO<sub>2</sub> emissions per capita for Suffolk, Ipswich performed better; this is shown in Figure B-5.

**Figure B-5 Estimated CO<sub>2</sub> Emissions Per Capita.**



In 2010 the estimate of CO<sub>2</sub> emissions for Ipswich per capita shows no change from the previous year. Ipswich Borough Council is committed to reducing its carbon emissions from the 2007/08 baseline by 30% by 2013 and by 50% by 2021. This equates to over 3,000 tonnes of CO<sub>2</sub> the equivalent of the output of 300 homes (Ipswich Borough Council, Impact Carbon Management Plan 2009).

In 2009, the average consumption of ordinary domestic electricity for Ipswich was 3,440 kWh per meter point, which is lower than the regional average of 3,980 kWh. Since 2007 there has been a reduction in domestic electricity usage of 149 kWh per meter point in Ipswich, which compares with a regional decrease of 159 kWh. Similarly, in 2009 the average consumption of domestic gas in Ipswich was 13,640kWh per meter, which was lower than regional averages (15,471kWh). Gas consumption in Ipswich between 2007 and 2009 has also reduced by 1,864kWh per meter point.

Transport consumption of energy in Ipswich in 2009 was 399gWh. This accounted for 0.3% of all energy consumption in the East of England region. Domestic energy consumption accounted for the majority of energy consumption in Ipswich in 2009 (914 gWh). This data is presented in Table B-5.

**Table B-5 Energy consumption by sector**

	Total	Industry and commercial	Domestic	Transport
	gWh	gWh	gWh	gWh
Ipswich	2,040	697 (34%)	914 (44%)	399 (20%)
East of England	137,894	48,473 (35%)	44,688 (32%)	44,305 (33%)
England	1,228,781	442,903 (36%)	416,703 (34%)	348,118 (29%)

Source: DECC

During Ipswich Borough Council's 2010/11 monitoring period planning permission was granted for one domestic and one business related solar panel installation. These developments were capable of generating 1.5kW and 3,301kWh respectively and have now both been installed. In addition, there were numerous solar panels installed under permitted development rights.

The Planning and Energy Act 2008 allows local authorities to include policies in their local development plans setting out reasonable requirements for:

- A proportion of energy used in development in their area to be energy from renewable sources
- A proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development

The above policies should be carefully considered and balanced in the DPDs with the need to ensure that the environment of the Borough is not adversely affected.

In terms of the provision of shading and greening, Ipswich Borough currently has approximately 12% tree canopy cover.

## Data Gaps and Uncertainties

- Level of energy efficiency in homes

## Key Sustainability Issues and Opportunities

- A number of areas within Ipswich do lie within the floodplain. Largely these areas are associated with the River Gipping..
- New development should be encouraged to use SuDS to manage runoff and further reduce flood risk (particularly as new development would be situated on previously undeveloped land).
- New developments should be encouraged to include sustainable design principles, energy efficiency and the incorporation of renewables e.g. the inclusion of solar panels and low carbon technologies. The carbon footprint of new development should be reduced.

## B.9 Biodiversity, Flora and Fauna

The following baseline indicators have been used to characterise conditions across the Borough and within Ipswich:

- Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and County Wildlife Sites (CWS) (MAGIC, SBRC, [www.magic.gov.uk](http://www.magic.gov.uk)).
  - Areas of woodland, including ancient woodland ([www.magic.gov.uk](http://www.magic.gov.uk)).
-

- Key Biodiversity Action Plan (BAP) species and habitats present (Suffolk BAP).
- Geodiversity sites ([www.geosuffolk.co.uk](http://www.geosuffolk.co.uk))

Ipswich contains a number of biodiversity sites of international, national, regional and local importance for nature conservation, as shown in Map 1 Sites of Ecological Importance.

There are three SSSIs located within the Borough; Stoke Tunnel Cutting (2.2ha), Bixley Heath (5.08 ha) and the Orwell Estuary (1335.52 ha). SSSIs represent the Country's very best wildlife and geological sites. The Orwell Estuary is also designated as a SPA under EC Wild Birds Directive<sup>9</sup> due to its importance for estuarine bird populations. In addition the estuary is also an internationally designated Ramsar site.

Ipswich also contains six LNRs and 19 CWSs. There was a net loss of biodiversity in 2010/11 of 0.15 hectares at the Wharfedale Road Meadow CWS (2010/11 Annual Monitoring Report Ipswich Borough Council).

There is one area of ancient and semi-natural woodland along with ancient replanted woodland to the south of the Borough.

The UK government published 'Biodiversity: The UK Action Plan' in 1994. This plan combined new and existing conservation initiatives with an emphasis on a partnership approach. It contains 59 objectives for conserving and enhancing species and habitats as well as promoting public awareness and contributing to international conservation efforts. Following on from the initial strategy publication, 391 Species Action Plans (SAPs) and 45 Habitat Action Plans (HAPs) were published for the UK's most threatened (i.e. "priority") species and habitats. In addition there are approximately 150 Local Biodiversity Action Plans, normally at county level. These plans usually include actions to address the needs of the UK priority habitats and species in the local area, together with a range of other plans for habitats and species that are of local importance or interest (Biodiversity Action Reporting System<sup>10</sup>).

The Suffolk BAP is made up of many individual species and habitat plans. Each plan gives information on the status and threats to the species or habitat. Suffolk BAP species and habitats include the following:

- **Habitat Action Plans**
  - Acid Grassland
  - Ancient and/or Species-rich Hedgerows
  - Cereal Field Margins
  - Coastal and Floodplain Grazing Marsh
  - Coastal Sand Dunes
  - Coastal Vegetated Shingle
  - Fens
  - Lowland Hay Meadows
  - Lowland Heathland
  - Lowland Mixed Deciduous Woodland
  - Maritime Cliffs and Slopes

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<sup>9</sup> Council Directive 79/409/EEC on the conservation of wild birds

<sup>10</sup> <http://www.ukbap-reporting.org.uk/>

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- Mudflats
  - Reedbeds
  - Saline Lagoons
  - Saltmarsh
  - Sea Grass Beds
  - Eutrophic Ponds
  - Traditional orchards
  - Urban
  - Wet Woodland
  - Wood Pasture and Parkland
  - **Species Plans**
    - Mammals
      - *Bats (grouped plan)*
      - *Brown hare Lepus europaeus*
      - *Dormouse Muscardinus avellanarius*
      - *European otter Lutra lutra*
      - *Harbour porpoise Phocoena phocoena*
      - *Red squirrel Sciurus vulgaris*
      - *Water vole Arvicola terrestris*
      - *Water Shrew Neomys fodiens*
    - Amphibians and reptiles
      - *Great crested newt Triturus cristatus*
      - *Natterjack toad Bufo calamita*
      - *Adder or Northern Viper Vipera berus*
    - Birds
      - *Bittern Botaurus stellaris*
      - *Grey partridge Perdix perdix*
      - *Skylark Alauda arvensis*
      - *Song thrush Turdus philomelos*
      - *Stone curlew Burhinus oedicnemus*
      - *Bullfinch Pyrrhula pyrrhula*
      - *Corn Bunting Miliaria calandra*
      - *Linnet Carduelis cannabina*
      - *Nightjar Caprimulgus europaeus*
      - *Reed Bunting Emberiza schoeniclus*
      - *Barn Owl Tyto alba*
      - *Spotted Flycatcher Muscicapa striata*
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- *Tree Sparrow Passer montanus*
  - *Turtle Dove Streptopelia turtur*
  - *Woodlark Lullula arborea*
  - *Little tern Sterna albifrons*
  - Invertebrates
    - *Cornflower Centaurea cyanus*
    - *Greater Water-parsnip Sium latifolium*
    - *Shepherd's needle Scandix pectinveris*
    - *Pillwort Pilularia globulifera*
    - *Red-tipped Cudweed Filago lutescens*
    - *Small-flowered Catchfly Silene gallica*
    - *Spreading Hedge-parsley Torilis arvensis*
    - *Tassel Stonewort Tolypella intricata*
    - *Tower Mustard Arabis glabra*
    - *Native Black Poplar Populus nigra ssp.betulifolia*
    - *Unspotted Lungwort Pulmonaria obscura*
    - *Man orchid Aceras anthropophorum*
  - Plants
    - *Cornflower Centaurea cyanus*
    - *Greater Water-parsnip Sium latifolium*
    - *Shepherd's needle Scandix pectinveris*
    - *Pillwort Pilularia globulifera*
    - *Red-tipped Cudweed Filago lutescens*
    - *Small-flowered Catchfly Silene gallica*
    - *Spreading Hedge-parsley Torilis arvensis*
    - *Tassel Stonewort Tolypella intricata*
    - *Tower Mustard Arabis glabra*
    - *Native Black Poplar Populus nigra ssp.betulifolia*
    - *Unspotted Lungwort Pulmonaria obscura*
    - *Man orchid Aceras anthropophorum*
  - Lichens and fungi
    - *Orange-fruited elm-lichen Caloplaca luteoalba*
    - *Sandy stilt puffball Battarraea phalloides*
    - *Starry breck-lichen Buellia asterella*
    - *Oak Polypore Buglossoporus pulvinus*
-

Source: Suffolk BAP<sup>11</sup>

In 2012 UK Post -2010 Biodiversity Framework was issued to set a broad enabling structure for action across the UK between 2012 and 2020:

- To set out a shared vision and priorities for UK-scale activities, in a framework jointly owned by the four countries, and to which their own strategies will contribute.
- To identify priority work at a UK level which will be needed to help deliver the internationally agreed targets and the EU Biodiversity Strategy.
- To facilitate the aggregation and collation of information on activity and outcomes across all countries of the UK, where the four countries agree this will bring benefits compared to individual country work.
- To streamline governance arrangements for UK-scale activity.

GeoSuffolk has designated 31 local geodiversity sites in Suffolk, 8 of these are Regionally Important Geological Sites (RIGS) and 23 are the new Public County Geodiversity Sites (CGS). All of these have public access. The list of geodiversity sites in Ipswich is presented in Table B-6 below.

**Table B-6 Geodiversity sites in Ipswich**

Site Name	Details
Blackfriars	London Clay septaria used as building stone.
Chantry Park Mansion	Ransomes stone (artificial)
Christchurch Park	Springs and seepages
Christchurch Park Lower Arboretum	Sarsen stones in rockery
Coprolite Street	'Fossil Animal Dropping Street'
Holywells Park RIGS	Springs and seepages
Ipswich Museum	Terracotta fossils on the façade. Large stones in the courtyard
Pipers Vale (Orwell Country Park)	Rotational slips, estuary, cliffs (valley gravel exposed).
Stoke Bridge Pocket Park	Sarsen stones
Stoke Tunnel SSSI	Interglacial site (no section visible)
St Nicholas Church	London Clay septaria and other local building stones

Source: <http://www.geosuffolk.co.uk/>

## Data Gaps and Uncertainties

- There are no significant data gaps or uncertainties for this topic.

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<sup>11</sup> <http://www.suffolkbiodiversity.org/biodiversity-action-plans.aspx>

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## Key Sustainability Issues and Opportunities

- There are a number of designated sites for biodiversity within the Ipswich Borough including SSSIs, LNRs, CWSs, and one SPA. New development which may have an adverse effect on any of the designated sites should be restricted. Opportunities to enhance biodiversity habitats should be maximised.
- Opportunities, where possible, should be sought to develop new and enhance a network of public open space. In addition, other opportunities should be sought to retaining existing habitats, such as water features, as they provide habitats for local species.
- There is a need to consider Suffolk Biodiversity Action Plan commitments.
- Opportunities should be sought to encourage integrated management of geodiversity within sites and areas designated for other interests, including biological SSSIs, Local Wildlife Sites, protected landscapes and Scheduled Ancient Monuments.
- The DPDs should support the conservation and storage of public geodiversity collections.

## B.10 Cultural Heritage

The following baseline indicators have been used to characterise the cultural heritage baseline:

- Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Historic Parks and Gardens ([www.magic.gov.uk](http://www.magic.gov.uk)).
- Number of Listed Buildings / SAMs / Conservation Areas and Registered Historic Parks and Gardens on English Heritage's 2011 Risk Register (English Heritage Scheduled Monuments at Risk East of England, 2011).
- Number of eligible open spaces managed to Green Flag standards (Civic Trust and Ipswich Borough Council).

In Ipswich there are over 600 Listed Buildings, of which 11 are Grade I and 31 are Grade II\* (Ipswich Borough Council, Listed Buildings in Ipswich). Listed Buildings are largely concentrated within the town centre. There has been little change in the number of listed buildings in the Borough since 1995.

There are also 14 Conservation Areas covering the historic areas of the Borough. As of 2012 all fourteen of the Conservation Areas in the Borough had been the subject of character appraisals.

There are ten SAMs within the Ipswich Borough. The SAMs in the Borough range from a Dominican Friary (remains of) to middle and late Saxon assets. SAMs in the Borough are largely located within the town centre.

English Heritage on behalf of the Government maintains the Register of Parks and Gardens of Special Historic Interest in England. These are designed landscapes that are considered to be of national importance. In Ipswich, the following parks and gardens are currently listed:

- Old and New Cemetery Grade II;
- Chantry Park Grade II; and
- Christchurch Park Grade II.

According to English Heritage's 2011 'At Risk' Register there are three statutory heritage assets considered to be 'at risk'. These assets include:

- St Mary at Quay, Quay Street, Ipswich, Grade II\* Listed Building and Conservation Area;
  - Barrack Corner, Conservation Area; and
-

- Stoke, Conservation Area.

The Civic Trust and DCLG administer the Green Flag Award, given for the quality and management of parks and other public open spaces. Two of parks within the Borough have been accredited with the Green Flag status; Christchurch Park and Holywells Park (Ipswich Borough Council July 2011).

Improving the quality of the public realm is viewed as very important as it contributes to an experience of a place or location. A high quality public realm can attract inward investment and increase quality of life for the resident population.

## Data Gaps and Uncertainties

- Planning permissions adversely affecting known or potential designated assets (historic buildings, archaeological sites etc.).

## Key Issues and Opportunities

- Ipswich is home to a wealth of heritage assets including those of a national and local importance. Several sites within Ipswich are listed on the Sites and Monuments Record.
- In addition, there are a number of Listed Buildings and it should be ensured that new development does not have detrimental effect on the architectural or historic value of these heritage assets.
- Cultural heritage features across the Borough should be conserved and enhanced.

## B.11 Landscape

The following baseline indicators have been used to characterise the existing conditions:

- Landscape characterisation (Suffolk Landscape Character Assessment, Suffolk County Council, <http://www.suffolklandscape.org.uk/>).
- Distribution and area of National Parks and Areas of Outstanding Natural Beauty (AONB) ([www.magic.gov.uk](http://www.magic.gov.uk)).
- Number of eligible open spaces managed to Green Flag standards (Civic Trust and Ipswich Borough Council).

The Suffolk Landscape Character Assessment identifies Ipswich town centre as urban, with some areas of ancient rolling farmlands to the north and northeast and estate sandlands to the east of the urban areas. (Suffolk Landscape Character Assessment<sup>12</sup>).

No National Parks are located within the Borough's boundary ([www.magic.gov.uk](http://www.magic.gov.uk)). However, the Suffolk Coast and Heaths AONB is located within close proximity of the southern Borough boundary.

Christchurch Park, 33 hectares in size, was given its third Green Flag award in July 2010 and its fourth Green Flag award in July 2011 in recognition of its excellent use of green space, well-maintained facilities and high standard of safety and security. Holywells Park was awarded its first Green Flag award in July 2011. Currently the amount of public open space in Ipswich owned and/or managed by the Borough Council is 477 hectares. The County Council, other public agencies and private landowners own further accessible open space in the Borough. An open space, sport and recreation facilities study published in September 2009 provides a

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<sup>12</sup> [http://www.suffolklandscape.org.uk/landscape\\_map.aspx](http://www.suffolklandscape.org.uk/landscape_map.aspx)

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breakdown of open space by type (2010/11 Annual Monitoring Report, Ipswich Borough Council).

## Data Gaps and Uncertainties

- Percentage of new housing completions achieving design standards such as Building for Life and Lifetime Homes

## Key Sustainability Issues and Opportunities

- Ipswich is a relatively built up and urban Borough. Some development will be sited on currently undeveloped agricultural fields.
- It is essential that landscape character and quality is enhanced through high quality design, careful siting, the incorporation of soft landscaping and attention to the boundary between the development and open countryside.
- It is important to maintain the gaps between Ipswich and neighbouring villages to preserve local distinctiveness.
- Opportunities should be sought to promote the local character and distinctiveness of the area where possible to encourage new residents.

## B.12 Minerals and Waste

The following baseline indicators have been used to characterise the existing conditions:

- Amount of household waste collected per household (Defra).
- Location and number of waste facilities serving the Borough (Suffolk County Council).
- Data regarding the use of recycled and secondary materials in the construction industry (Suffolk County Council Waste and Minerals Annual Monitoring Report 2010/11).
- Household waste recycling and composting achieved (Defra).
- Number of planning applications relating to mineral development (Suffolk County Council, Minerals and Waste Annual Monitoring Report 2010/11).

The Suffolk Minerals and Waste Development Framework (MWDF) contains mineral and waste specific policies for use in determining planning applications for waste or quarry developments in Suffolk. It sets out the strategy for future minerals and waste development and addresses issues including mineral extraction; waste management and recycling; protecting mineral resources and restoring minerals and waste sites ([www.suffolk.gov.uk](http://www.suffolk.gov.uk)).

In Ipswich, 505kg of residual waste was recorded per household in 2010/11. This is less than the waste per household in the East of England region (542kg). From 2009/10 to 2010/11, the amount of residual waste in Ipswich reduced by 4kg per household compared with a reduction of 29kg for the East of England region (Defra).

In Ipswich 42% of household waste was sent for reuse, recycling or composting in 2010/11. The percentage of waste sent for reuse, recycling or composting increased in Ipswich between 2009.10 and 2010/11 from 40.2% to 42%. However, reuse / recycling / composting rates are lower than those recorded for Suffolk, the East of England although higher than those recorded for England (results are presented in Table B-7) (Defra).

**Table B-7 Household Waste Recycling and Composting Achieved**

	Rate Achieved 2008/09 (%)	Rate Achieved 2009/10 (%)	Rate Achieved 2010/11 (%)
Ipswich	41.1	40.2	42.0

Suffolk	48.4	50.6	53.8
East of England	44.5	46.1	48.8
England	37.6	39.7	41.2

Source: Defra, national and regional figures were collected from the Waste Statistics on Defra's website.

Waste disposal is an important strategic issue for Suffolk. Suffolk County Council's adopted (March 2011) Waste Core Strategy identifies the following waste facilities within and within close proximity of Ipswich:

- Ipswich Hospital (incinerator with energy recovery) NB clinical waste;
- Ipswich Composting Facility;
- Ipswich Household Waste and Recycling Facility;
- Cliff Quay Anglian Sewage Treatment Works;
- Bramford Quarry (Non-Hazardous Landfills);
- Cook Transfer Station (Waste Transfer Facility);
- Valley Farm Pit (Secondary Aggregates);
- F. A. Edwards & Son Ltd (Metals/End of Life Vehicles);
- F J Metals (Metals/End of Life Vehicles); and
- Whip St Motors (Metals/End of Life Vehicles).

The Suffolk Annual Waste Survey 2009 indicated sales of recycled aggregate to be 257,497 tonnes, and this was less than the average yearly forecast of approximately 500,000 tonnes, identified in the Minerals Core Strategy. This also reflected the downturn in the economy. During 2010/11, one application at Waldringfield (outside of Ipswich) was received for minerals extraction. To reduce the need for natural resources, recycled and secondary materials should be used where feasible in construction projects and new development.

## Data Gaps and Uncertainties

- There are no key data gaps or uncertainties.

## Key Sustainability Issues and Opportunities

- There are a number of waste facilities within the Borough, including, a household waste and recycling centre, a composting site and facilities for metal / end of life vehicles (not inclusive). In addition, an energy from waste incinerator is under construction at Great Blakenham (Masons Quarry) which lies approximately 3km north of the Borough boundary, therefore transport implications must be managed carefully.
- Although 42% of household waste produced in Ipswich is being sent for reuse, recycling or composting instead of to landfill, this is lower than the figure for Suffolk (53.8%).
- Opportunities should be sought to enhance recycling and composting performance.
- Sustainable sourcing and waste management principles should be promoted for all new development.

## B.13 Transportation

The following baseline indicators have been used to characterise the existing conditions across the Borough:

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- Distribution of major transport systems – roads, airports, ports, rail etc (Ordnance Survey mapping, Ipswich Borough Council, Suffolk County Council).
- Journey to work by mode (2011 Census).
- Number of housing developments of ten or more dwellings approved and located within 30 minutes travel time of a GP, primary and secondary school, employment area and major retail centre (Ipswich Borough Council 2010/11 Annual Monitoring Report).
- Road network capacity (Ipswich Travel Model Assessment, 2010)

Ipswich serves as an important employment centre for outlying areas with approximately 97,000 (Census 2011) people travelling to work each day in Ipswich. Central Ipswich is the destination for almost 50% of these journeys. In 2011, 7.4% of people in employment worked mainly from home and more than 50% of people travelled to work by car or van. The percentage of people working from home is lower than that for England (10.64%). The percentage of people travelling to work by car (53.44%) is similar to that for England (53.71%).

The use of buses (public transport) is significantly higher than regional and similar to national levels (see Table B-8). Walking exceeds regional and national levels. The Ipswich Community Strategy includes a series of key priorities addressing transport and accessibility which include encouraging the provision and use of an integrated effective transport system which maximises the use of public transport, walking and cycling and reduces the overall impact of travel on the environment.

**Table B-8 Journey to Work By Mode**

<b>Usual Journey to Work Mode</b>	<b>Ipswich (%)</b>	<b>East of England (%)</b>	<b>England (%)</b>
Working mainly at or from home	7.40	11.07	10.64
Underground, light rail, metro or tram	0.09	1.12	3.94
Train	2.34	6.95	5.14
Bus, minibus or coach	7.57	3.64	7.30
Motorcycle, scooter or moped	1.09	0.77	0.79
Driving a van or car	53.44	58.16	53.71
Passenger of a van or car	6.78	4.90	4.88
Taxi or Minicab	0.34	0.42	0.48
Bicycle	4.58	3.43	2.86
On foot	15.99	9.07	9.76
Other	0.38	0.47	0.49

Source: Census 2011

18,300 pupils travel each day to the 52 schools in the wider Ipswich area. Three new education institutions catering for sixth form, further and higher education will contribute a further 10,420 students and 1,250 employees travelling in Ipswich (2011 State of Ipswich Report, Ipswich Borough Council).

Significant development within Ipswich could increase the transport pressures that currently exist within the town. Traffic modelling has shown that with the anticipated level of growth traffic could grow by over 15% by 2021. There will also be additional pressures on the A12/A14 at

Copdock, Seven Hills Interchange and the Orwell Bridge. Significant housing development is also proposed within the Northern Fringe area and this, together with planned growth in Suffolk Coastal on the eastern fringe of the town will add significant pressure to radial routes leading to the town centre, the principal focus for employment. It will be important to ensure that transport is fully integrated with the development plans for these locations. Many peak hour journeys in Ipswich are fairly short and yet are carried out by car. Congestion levels are already seen as a significant problem (Suffolk County Council, Local Transport Plan 2011 – 2031; Ipswich Travel Model Assessment, 2010).

Bus service provision in Ipswich is generally good, and provides commercial services but there are some areas that are not well served. There are no orbital services so passengers wanting to skirt around the town have to travel into the centre and then out again. There is currently a lack of multi-operator ticketing which exacerbates this problem. The availability and pricing of car parking within the town is also an important factor in the travel choices that people make. More than half of long-stay parking capacity in the town is privately owned and much of it at little or no cost to users. The Ipswich – Transport fit for the 21st Century scheme is a £21 million package of traffic management, smarter choices, bus, walking and cycling improvements to address the main transport issues facing Ipswich over the next period (Suffolk County Council, Local Transport Plan 2011 – 2031).

All housing developments of ten or more dwellings completed in Ipswich during 2010/11 were within 30 minutes travel time by foot and public transport of a GP, primary and secondary school, employment area and major retail centre. However, two developments were not within 30 minutes travel time of a hospital by public transport (Ipswich Borough Council 2010/11 Annual Monitoring Report).

## Data Gaps and Uncertainties

There are no key data gaps or uncertainties for this topic.

## Key Issues and Opportunities

- The Borough is well-connected by transport infrastructure and public transport links, making most areas relatively accessible.
- Opportunities should be sought to reduce dependence on the private car and increase public transport use.
- It will be important to ensure that new development can be easily accessed by public transport.
- The cycling and walking network should be expanded and enhanced.

## B.14 Economy

The following baseline indicators have been used to characterise economic conditions across the Borough:

- Location of key industries and major employers (Ipswich Borough Council).
  - Economic activity rate (ONS – Nomis).
  - Employment by sector (Office for National Statistics Local Profiles).
  - Employment by occupation (ONS – NOMIS).
  - Percentage of resident population claiming Jobseekers' Allowance in 2012 (ONS – Nomis).
  - Average weekly pay (2011 State of Ipswich Report, Ipswich Borough Council).
  - Employment land availability (Employment Land Availability 2012 Report).
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- Planning permissions for employment sites ((Employment Land Availability 2012 Report).
- Vacant retail units (Ipswich Local Plan Supplementary Planning Guidance District and Local Shopping Centres 2012)

Ipswich is a historic county town of Suffolk and a major centre of population, economic activity and growth in the Eastern Region. Ipswich has one of the strongest finance and insurance sectors in the country. It is home to commercial giants Willis, AXA and RBS. The economic structure of Ipswich predominantly comprises tertiary sector activities which encompass more than 80% of the total employment. There is a strong reliance on public sector employment, including two councils, a hospital trust and University Campus Suffolk (UCS). Key local economic sectors identified are:

- Port and logistics;
- Financial services;
- Education and applied research;
- Culture;
- Health and Social Work;
- Construction;
- Distribution and Hotels;
- Public Sector.

Table B-9 below compares employment by sector in Ipswich, Suffolk and the East of England.

**Table B-9 Employment by Sector %**

Industry	Ipswich	Suffolk	East
Agriculture	0.38	1.84	1.06
Accommodation and Food Service activities	5.61	5.35	4.70
Human Health and Social Work	13.75	12.17	11.49
Manufacturing	7.92	9.84	8.70
Construction	8.05	8.36	8.61
Distribution	17.65	16.05	16.38
Transport and Storage	7.51	6.00	5.29
Finance & Insurance	6.11	3.55	5.01
Information and Communication	4.08	3.19	3.90
Public admin and Education	18.37	19.45	20.38
Professional, Scientific and Technical Activities	3.74	5.21	6.76
Other services	6.83	9	7.71

Source: ONS April 2011 – March 2012 data

Despite the economic downturn the Borough's economy continues to perform well when compared to other districts across the East of England. This is in part due to the fairly high concentration of public sector employment within the Borough with approximately 18.37% of people employed in the public sector (2011).

The economic activity rate measures the proportion of the adult population in paid employment, unemployed actively seeking employment or who are full-time students. The figure of economically active people in employment for Ipswich is 75.6% between July 2012 - Jun 2013, slightly higher than for the East of England (75.0%) and higher than that for Great Britain (71.1%). In July 2012 5% of the resident population were claiming Jobseekers Allowance, compared to 3% in the East and 3.8% across England (NOMIS<sup>13</sup>).

A lower than average proportion of Ipswich's population are classified as managers or senior officials (Ipswich – 5.5%, East 11.1%, Great Britain 10.2%), while caring, leisure and other service occupations along with sales and customer service occupations and process plant and machine operatives are higher than regional and national averages. This data is presented in Table B-10.

**Table B-10 Employment by Occupation**

Employment	Ipswich (%)	East of England (%)	England (%)
Managers, directors and senior officials	5.5	11.1	10.2
Professional occupations	18.7	19.6	19.6
Associate professional and technical	11.5	14.8	14.1
Administrative and secretarial	11.6	11.4	10.9
Skilled trades occupations	7.5	10.6	10.4
Caring, leisure and Other Service occupations	11.5	8.5	8.9
Sales and customer service occupations	9.5	7.5	8.0
Process plant and machine operatives	7.3	6.2	6.3
Elementary occupations	16.5	9.7	10.9

Source: NOMIS

On average, the gross weekly pay for employees in Ipswich is £445.5 (2012), which is lower than the East of England average (£531.0) and lower than the national average (£508.0). Part of the reason for this is because the gross weekly pay for female workers at £380.5 is significantly (27.1%) behind that for males in Ipswich (£522.3) and the national average for females (£449.6) (NOMIS 2012).

The total amount of employment land available has decreased by 4.03 hectares (ha) to 71.74 ha across the whole of Ipswich at April 2012 due to the implementation or expiry of planning permissions. The total consists of 0.63 ha with unimplemented planning permission, 18.73 ha

<sup>13</sup> <http://www.nomisweb.co.uk/reports/lmp/la/2038431855/report.aspx?town=ipswich#tabwab>

on allocated land and 52.38 ha of vacant land within identified employment areas. Completions on allocated and existing employment sites for the current monitoring year has been recorded as zero hectares (Employment Land Availability 2012 Report).

Planning consents for employment sites (over 100 sqm) for the year 2011-12 amount to 15.07 ha, of which 14.44 ha are extensions or new buildings within existing employment areas, and 12.57 ha are outline planning permissions (largely accounted for by the outline planning permission for employment uses at the former Crane's factory site).

According to the SPG District and Local Shopping Centres 2012 there are 46 vacant retail units in the Borough.

## Data Gaps and Uncertainties

- Commercial / retail rental data.
- Business start-ups and closures.
- No. of business enquiries to Ipswich Borough Council / Suffolk County Council by types and size of site.

## Key Sustainability Issues and Opportunities

- There is a need to improve training levels to enhance the quality of the local workforce.
- The economy in Ipswich needs to be diversified to broaden the economic base.
- The good transport links in the Borough should be exploited as accessibility is a key issue when encouraging new residents.

# B.15 Deprivation and Living Environment

The following baseline data has been identified:

- Number of wards with LSOAs in the bottom 10% most deprived within the Index of Multiple Deprivation (2011 State of Ipswich Report, Ipswich Borough Council).
- Number of domestic noise and light complaints

Deprivation is a multi-faceted and complex problem which influences and is influenced by a wide range of factors. In general, between 2007-2010, all Local Authorities in Suffolk became relatively more deprived (NB data does not include the effects of the credit crunch and recession). Ipswich remains the most deprived Local Authority in Suffolk being ranked 87/326 in England (Waveney 112/326; Mid Suffolk 274/326), and all of the areas ranked in the bottom 20% of Suffolk are found in either Ipswich or Lowestoft. All of the Suffolk lower super output areas (LSOA) ranked in the worst 10% of England in 2010 (14) are in Ipswich (9) 64% and Lowestoft (5) 36%. The Bridge Ward had the only LSOA to have moved out of the worst 10% ranking, but LSOAs in Whitton and Stoke Park dropped in rank sufficiently to fall into this group.

During the period April 2012 – March 2013 Ipswich Borough Council served Noise Abatement Notices on 43 premises. During the same period of time there were no abatement notices for light nuisance served.

## Data Gaps and Uncertainties

- Provision of childcare.

## Key Sustainability Issues and Opportunities

- There are a number of wards within Ipswich which are considered to be in the bottom 20% most deprived nationally (Index of Multiple Deprivation).
-

- Deprivation is a very complex issue and a number of different issues will need to be addressed for noticeable improvements to be realised.

## B.16 Housing

The following baseline indicators have been used to characterise the status of housing across the Borough:

- Average house price (Suffolk Observatory).
- Ratio of relative housing affordability (Office for National Statistics Local Profiles).
- Number of vacant dwellings (Office for National Statistics Local Profiles).
- Dwelling Stock by Tenure (Office for National Statistics Local Profiles and 2011 State of Ipswich Report, Ipswich Borough Council).
- Number of affordable housing completions (Office for National Statistics Local Profiles).
- Number of Homeless presentations (2011 State of Ipswich Report, Ipswich Borough Council).

Since 2001, the number of dwellings in Ipswich has increased by 11.9%. The total housing stock rose from 57,914 at 1st Apr 2009 to 58,303 at 31st Mar 2010. In 2009 the composition of housing was 14.2% (8210 dwellings) Local Authority stock, 7.8% (4510 dwellings) Registered Social Landlord stock, and 77.8% (44982 dwellings) private housing stock (2011 State of Ipswich Report, Ipswich Borough Council).

The total housing stock in Ipswich rose from 58,303 at the beginning of the 2010 monitoring period to 58,640. Council Tax records show total housing stock as 58,882 rising from 58,441 – Council Tax records include student accommodation.

Housing costs are relatively low but gradually increased in recent years. Median house price (July 2013) in Ipswich is £150,000, which shows an increase of 7.1% from the median price of the same time the previous year (£140,000). The average house price is lower than Suffolk (£167,000 in July 2013) and lower than that in the East of England (£178,000 August 2013 – ONS).

The affordability of purchased homes in 2011 was a ratio of 5:7 which was less than the affordability for Suffolk 6:9, the East of England 7:6 and England 6:5 (Office for National Statistics Local Profiles).

In Ipswich, the number of affordable homes provided in 2010/11 was 150 and over the period since 2006/07 the maximum number of affordable homes was 500 in any year (Office for National Statistics Local Profiles). During the period April 2011 – March 2012 283 dwellings net were completed, 54% of them were affordable homes (AMR 8 2011/2012). The longer-term affordable housing delivery average as a percentage of total housing completions for 2001-12 is 22%.

The number of homeless people has been increasing since 2010. During 2012/13, 617 people were identified as homeless in Suffolk according to the statutory criteria compared to 368 in 2010/2011 and 500 in 2011/2012 (Suffolk Observatory).

In 2011 1,909 of Ipswich's housing stock was vacant. This is slightly higher than the previous year (1,918). Of the 1,909 vacant homes 635 were long term vacants. It is not stated as to what types of dwellings are vacant i.e. there could be a low demand for large expensive homes yet a high demand for affordable homes.

Table B-11 presents details of the tenure of housing stock across the Borough in 2011, highlighting that owner occupation in the Borough is lower national and regional averages.

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**Table B-11 Dwelling Stock by Tenure (2011)**

	<b>Local Authority Dwelling Stock (%)</b>	<b>Registered Social Landlord Dwelling Stock (%)</b>	<b>Shared Ownership (%)</b>	<b>Owner Occupied and Private Rented Dwelling Stock (%)</b>
Ipswich	14.20	7.39	0.64	78.0
East of England	7.80	7.90	0.73	83.9
England	9.43	8.27	0.79	82.0

Source: Census 2011, ONS

Ipswich Borough Council's Strategic Housing Market Assessment (2008) reported the following conclusions:

- The current gross housing need, is calculated to be 3,723;
- The annual future need is calculated to be 2,665 (per annum);
- The total affordable housing stock available is calculated to be 1,563; and
- The future annual supply of affordable housing units is calculated to be 1,520.

The Strategic Housing Market Assessment found a substantial need for smaller 1-2 bedroomed homes in Ipswich to meet the needs of smaller households and an ageing population, as well as a continued need for smaller 2-3 bedroomed family homes. They also reported that some local Black, Asian and Minority Ethnic households require larger affordable homes, so there is also a continuing need for a small number of larger 4+ bedroomed homes. Much of recent housing development in Ipswich, however, has been in the form of 1 and 2 bedroomed apartments and in the present economic climate there is an oversupply of flats.

The Ipswich Housing Needs Study 2005 looked at housing needs across the Borough. It has been partly updated through the Strategic Housing Market Assessment in 2008. Combined findings of the two studies indicate that:

- Around 66% of households are owner occupiers, 22% live in the social rented sector and 12% in the private rented sector;
  - One quarter of households consist of older persons only, and such households account for 37% of all Council accommodation;
  - Around 12% of the net affordable housing requirement comes from key worker households;
  - Nearly 2% of households live in overcrowded homes, whilst 34% under occupy their dwelling;
  - When households were asked in 2005, around two thirds of their previous house moves had been within the Borough;
  - Ipswich has lower than average property prices;
  - There is a shortfall of affordable housing 2005-2010 of 798 units per annum and ongoing need thereafter;
  - The need is most acute for small properties, notably two bedroom homes, and is geographically widespread; and
  - 80% of any affordable target should be social rented housing (Ipswich Borough Council, Adopted Core Strategy (2011)).
-

In 2012 the Strategic Housing Market Assessment was further updated to reflect the economic and political change that has occurred since the SHMA was published in 2008. The findings of the study indicate that:

- On average, incomes in the Ipswich HMA remain below both regional and national levels. Earnings in Ipswich are well below those in the rest of the Housing Market Area (HMA). This update estimates that 41% of newly forming households are not be able to afford to rent or buy a home within the Ipswich HMA.
- Worsening affordability of housing reduces the rate that young adults form households. One effect has been for more young people to live with parents. Nationally, around one in three men and one in six women aged 20 to 34 now live with their parents, an increase from one in four men and one in seven women in 1997.
- A lack of choice of housing affects mobility within the labour-market and, therefore, the economy. There are also local spatial implications for the Ipswich HMA if this trend continues such as:
  - an even greater need for affordable housing in the least affordable areas;
  - greater household formation in more affordable areas such as Ipswich, increasing the birth-rate which increases demand for schools for example, and
  - further commuting from more affordable to less affordable areas.
- One consequence of an aging population is a reduced average household size as fewer households contain children and more single households are present.
- Currently, there is a backlog of over 4,000 households in need of a suitable and affordable home in the Ipswich HMA. The supply of new affordable homes and the reuse of existing stock are not sufficient. In order to address this shortfall, 70% of all new homes in the Ipswich HMA currently being planned would need to be affordable.
- With more older people being assisted to remain at home, the trend for larger homes to be under-occupied is likely to increase. This could have a knock-on effect of constraining the supply of homes. At the same time, older people will expect more choice on the type, quality and location of accommodation.

## Data Gaps and Uncertainties

- Percentage of new dwellings meeting BREEAM/Code for Sustainable Homes Level 4 standards.

## Key Sustainability Issues and Opportunities

- House prices have gradually increased but incomes have not matched this rate of growth, which may lead to problems of housing affordability.
  - The adopted Core Strategy sets a target to allocate land to accommodate 700 dwellings per annum (14,000 from 2001 to 2021).
  - The Strategic Housing Marketing Assessment 2008 which has further been updated in 2012 found there is a need for smaller 1-2 bedroomed homes in Ipswich to meet the needs of smaller households and an ageing population, as well as a continued need for smaller 2-3 bedroomed family homes. Much of recent housing development in Ipswich, however, has been in the form of 1 and 2 bedroomed apartments and in the present economic climate there is an oversupply of flats.
  - Housing regeneration efforts present a significant opportunity both to revitalise the housing stock and to improve quality of life.
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- Development within the Northern Fringe area provides opportunities to meet housing needs, particularly for family housing and to counter balance the provision of flats within Ipswich town centre.

## B.17 Transboundary Issues

For many authorities, the geographical scale of particular baseline issues means that they relate closely to neighbouring authorities. For example, housing provision and prices, employment migration and commuting, service provision and education can all result in flows of people across Local Authority boundaries. In order to help to characterise the baseline further, some of these key 'transboundary' issues have been identified below.

- Waste disposal is a significant issue for Ipswich with the adopted Suffolk Core Strategy identifying a deficit of waste facilities for the future.
  - Ipswich may encounter a shortage of affordable dwellings in the future, which may lead to people relocating to cheaper parts of the East of England.
  - Cumulative impacts regarding major roads should be considered.
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## Appendix C

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### Sieve analysis of changes to policies

## Sieve Analysis of Changes to Core Strategy Policies

Changes to policies are set out in the table below. The policies are set out in full for clarity and changes to policy such as deletions are indicated as strikethrough and additional text are underlined. This table presents an assessment of the significance of the changes to the Core Strategy Policies. Those which are assessed as having minor significance will not be further assessed, while those which have significantly changed will be assessed.

**Table C-1 Sieve Analysis of Changes to Core Strategy Policies**

Core Strategy Policies	Changes to Policies	Sustainability Impacts
<p>Policy CS1: Sustainable Development – Climate Change</p>	<p>Changes to policy clauses in Policy CS1: Sustainable Development – Climate Change</p> <p><b>In Ipswich a comprehensive approach will be taken to tackling climate change and its implications through:</b></p> <ul style="list-style-type: none"> <li>a. <b>Requiring all new development to incorporate energy conservation and efficiency measures, to achieve significantly reduced carbon emissions by 2016 for all new residential and major non-residential development;</b></li> <li>b. <b>Requiring all major developments to achieve a target of at least 15% of their energy requirements to be provided through decentralised renewable or low carbon energy sources where feasible and viable;</b></li> <li>c. <b>Seeking opportunities to develop renewable energy generating capacity including on Council-owned land;</b></li> <li>d. <b>Supporting <u>the implementation of the Suffolk Climate Action Plan produced by the Suffolk Climate Change Partnership</u> and other appropriate local carbon reduction schemes;</b></li> <li>e. <b>Implementing the IMPACT Carbon Management scheme and reducing carbon emissions from the Council's own operations by 30% by 2013 and 50% by 2021 from a 2007/08 baseline;</b></li> <li>f. <b><u>Supporting the protection, caring for and increase in canopy cover across the Borough during the plan period;</u></b></li> </ul>	<p>The additional text to Policy CS1 would not change the previous SA assessment as they simply update and strengthen the policy by providing additional provisions relating to canopy cover and open spaces to mitigate against climate change.</p> <p><b>No further SA assessment required.</b></p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p>g. <u>Seeking opportunities to utilise parks and open space and ecological networks potential in the mitigation and adaptation against climate change.</u></p> <p>h. Supporting the implementation of the Ipswich Flood Defence Strategy by the Environment Agency; and</p> <p>i. Requiring building and infrastructure design to incorporate water conservation, capture, recycling and efficiency measures and sustainable urban drainage systems (SuDS).</p> <p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <ul style="list-style-type: none"> <li>• Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</li> <li>• Specific policies in that Framework indicate that development should be restricted.</li> </ul>	
Policy CS2: The Location and Nature of	<p>Changes to policy clauses in Policy CS2: The Location and Nature of Development</p> <p><b>The regeneration and sustainable growth of Ipswich will be achieved through:</b></p>	<p>The additional text to Policy CS2 would not change the previous SA assessment as they promote town centre locations for offices and linking</p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
Development	<p>a. <b>Focusing <del>most</del> new residential development and community facilities into the town centre, the Waterfront and Ipswich Village, and into or within walking distance of the town's district centres;</b></p> <p>b. <b>Focusing major new retail development into the Central Shopping Area;</b></p> <p>c. <b>Focusing new office, hotel, cultural and leisure development into Ipswich town centre;</b></p> <p>d. <b>Promoting a strategic employment site at Crane's, Nacton Road, to support economic development and jobs growth;</b></p> <p>e. <b>Directing other employment uses (B1 <del>except office</del>, B2 and B8) to employment areas distributed in the outer parts of the Borough, <u>although there will be a town centre first approach to the location of offices;</u></b></p> <p>f. <b>Dispersing open space based (non-commercial) leisure uses throughout the town <u>with preferred linkage to ecological networks and/or green corridors;</u></b></p> <p>g. <b>Development demonstrating principles of very high quality architecture and urban design.</b></p> <p><b>In addition to the above locations, a sustainable urban extension to north Ipswich is planned subject to the prior provision of suitable infrastructure (see Policy CS10).</b></p> <p><b>Major developments within the town centre, Ipswich Village, and district centres should incorporate a mix of uses to help achieve integrated, vibrant and sustainable communities. Major developments are defined as commercial developments of 1,000 sq. m or more or residential developments of 10 units or more. The mix will consist of at least two uses, with the lesser use consisting of at least 20% of net floorspace. Exceptions may be made for large offices or education buildings for a known end user.</b></p> <p><b>Development densities will be high in the town centre, Ipswich Village and Waterfront, medium in the rest of IP-One and in and around the district centres, and low elsewhere.</b></p>	<p>leisure uses to ecological networks or green corridors.</p> <p><b>No further SA assessment required.</b></p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
Policy CS3: IP-One Area Action Plan	<p>Changes to policy clauses in CS3: IP-One Area Action Plan</p> <p><b>The Council will prepare and implement an IP-One Area Action Plan <u>incorporated in the Site Allocations and Policies development plan document</u> to plan for significant change in central Ipswich. The Area Action Plan will include policies which:</b></p> <ul style="list-style-type: none"> <li><b>a. Define the extent of the town centre, Waterfront and Ipswich Village;</b></li> <li><b>b. Allocate sites for development in IP-One, including land to provide approximately 2,000 dwellings;</b></li> <li><b>c. Set down development principles to apply in identified opportunity areas where change will be concentrated;</b></li> <li><b>d. Define the Central Shopping Area and primary, secondary and speciality shopping frontages;</b></li> <li><b>e. Define and safeguard the Education Quarter to support <del>the delivery of Phase 3 of the</del> development of University Campus Suffolk, <u>Suffolk New College and a new primary school</u>;</b></li> <li><b>f. Define conservation areas within its boundary, including the Central and Wet Dock Conservation Areas, which will be protected and enhanced;</b></li> <li><b>g. Define the Central Car Parking Core within which parking controls will apply;</b></li> <li><b>h. Identify where new community facilities and open space should be provided within IP-One; <del>and</del></b></li> <li><b>i. Provide a framework for the delivery of regeneration in IP-One; <u>and</u></b></li> <li><b>j. <u>Provide tree-planting, urban greening schemes mindful of the ecological network to improve the street scene and permeability for wildlife throughout the town centre.</u></b></li> </ul>	<p>The additional text to Policy CS3 would not change the previous SA assessment as they only provide further information: that the IP-One Area Action Plan will be incorporated into the Site Allocations and Policies development plan document and that there will be a Suffolk New College and a new primary school. Additional text also promotes tree planting and ecological schemes.</p> <p><b>No further SA assessment required.</b></p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p><b>Sites and designated areas within the IP-One area will be identified on a revision of the <u>policies Proposals Map to be prepared alongside the DPD.</u></b></p>	
<p>Policy CS4: Protecting our Assets</p>	<p>Changes to policy clauses in CS4: Protecting our Assets</p> <p><b>The Council is committed to protecting and enhancing the Borough's built, historical, natural and geological assets.</b></p> <p><b>The Council will protect and enhance the character and appearance of conservation areas, by preparing character appraisals and using them to guide decisions about development.</b></p> <p><b>The Council will also seek to conserve and enhance local biodiversity in accordance with <u>the National Planning Policy Framework</u> <del>Planning Policy Statement 9</del>, <u>and national legislation by, and through:</u></b></p> <ol style="list-style-type: none"> <li><b>a. Requiring new development to incorporate provision for conserving and enhancing local biodiversity, <u>canopy cover</u> and geodiversity interests;</b></li> <li><b>b. Supporting the Greenways Project;</b></li> <li><b>c. Designating additional Local Nature Reserves where appropriate; <del>and</del></b></li> <li><b>d. Preparing and implementing management plans for Council owned wildlife sites; <u>and</u></b></li> <li><b>e. <u>Identifying an ecological network across Ipswich and linking into adjacent areas, and protecting and enhancing it in accordance with policy DM34 in the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document to maximise the benefits of ecosystem services.</u></b></li> </ol> <p><b>The Council will encourage the use of local reclaimed, renewable, recycled and low environmental impact materials in construction, in order to conserve finite natural resources and minimise environmental impacts. New development will also be required to minimise the amount of waste generated during construction and through the lifetime of the building.</b></p>	<p>The additional text to Policy CS4 updates the policy to reflect the recent changes to national planning policy (i.e. the National Planning Policy Framework) but more significantly, it provides for identifying, protecting and enhancing an ecological network across the Borough. This change is expected to have positive effects on:</p> <ul style="list-style-type: none"> <li>• SA Objectives ET8 (To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs)</li> <li>• ET10 (To conserve and enhance the quality and local distinctiveness of landscape and townscape), and</li> <li>• HW1 (To improve the health of those most in need) the ecological corridors may help promote walking along the corridors and have an indirect contribution to this objective.</li> </ul> <p>In the 2009 assessment, CS 4 scored against the following SA Objectives:</p> <ul style="list-style-type: none"> <li>• ET8 (To conserve and enhance biodiversity) (++) strong positive)</li> <li>• ET11 (To protect and enhance</li> </ul>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
		<p>favourable conditions on SSSIs, SPAs and SACs) (+ positive),</p> <ul style="list-style-type: none"> <li>• ET10 (To conserve and enhance the quality and local distinctiveness of landscapes and townscapes) (+ positive)</li> <li>• HW1 (To improve the health of those most in need) (0 neutral).</li> </ul> <p>The additional text would therefore contribute more positively to these SA Objectives.</p> <p><b>No further SA Assessment required.</b></p>
Policy CS5: Improving Accessibility	<p>Changes to CS5: Improving Accessibility</p> <p><b>Development should be located and designed to minimise the need to travel and to enable access safely and conveniently on foot, by bicycle and by public transport (bus and rail). This will encourage greater use of these modes. The Council will support the implementation of the <u>Travel Ipswich Major Scheme</u> and will work with the Highway Authority to manage travel demand in Ipswich and in doing so will prioritise the introduction of an integrated cycle network.</b></p>	<p>The additional text to Policy CS5 would not change the previous SA assessment as it only updates the policy.</p> <p><b>No further SA assessment required.</b></p>
Policy CS6: The Ipswich Policy Area	<p>Changes to CS6: The Ipswich Policy Area</p> <p><b>Ipswich Borough Council recognises the importance of joint working and the coordination of planning policies around the fringes of Ipswich, in order to deliver appropriate development. It will achieve this in a variety of ways:</b></p> <p><b>a. Formal working through the Ipswich Policy Area Board or other relevant forums <u>and developing a jointly agreed strategy;</u></b></p>	<p>The additional text to Policy CS6 would not change the previous SA assessment as it only updates the policy.</p> <p><b>No further SA assessment required.</b></p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p>b. Joint working on <u>Local Plan</u> LDF evidence gathering, monitoring and updating, to ensure a consistent approach; and</p> <p>c. Joint working <del>through the Haven Gateway Partnership</del> to develop shared approaches, such as that for strategic green infrastructure.</p> <p>The preparation of joint development plan documents is not proposed at present <u>but may be necessary later in the plan period</u>, <del>but will be reconsidered as part of the review of this Core Strategy.</del></p>	
Policy CS7: The Amount of Housing Required	<p>Changes to CS7: The Amount of Housing Required</p> <p><del>The Council will endeavour to enable continuous housing delivery to meet its objectively assessed housing need throughout the plan period for at least fifteen years from the adoption of this plan. The Council will allocate land to provide for at least an additional 5,909 4,786 dwellings net to be provided in the Borough by 2031 2022. Sites will be identified through the Site Allocations and Policies (incorporating IP-One Area Action Plan) and the Site Allocations and Policies Development Plan Document in accordance with the spatial strategy in this Core Strategy, in addition to the land allocated at the Northern Fringe.</del></p> <p><del>Land supply for the years 2021 to 2027 is addressed principally by the Northern Fringe development.</del></p> <p>The Northern Fringe development will contribute significantly to meeting the housing needs of the Borough throughout the plan period.</p> <p><u>To meet the remaining requirement of 4,611 dwellings to 2031, the Council will rely on windfall sites and will work with neighbouring local authorities to address housing need later in the plan period.</u></p>	<p>The changes to the housing numbers and the provisions of Policy CS 7 are significant and a new assessment would be required since the previous SA assessment was based on different figures.</p> <p>SA assessment required.</p>
Policy CS8: The Balance between	Changes to Policy CS8: The Balance between Flats and Houses	The additional text supporting self build and custom build developments in

Core Strategy Policies	Changes to Policies	Sustainability Impacts
Flats and Houses	<p><b>The Council will plan for a mix of dwelling types to be provided, in order to achieve mixed and sustainable communities. All major schemes over 10 dwellings will be expected to provide a mix of dwelling types and sizes in accordance with the Council's Housing Needs Study and Strategic Housing Market Assessment.</b></p> <p><b>Exceptions to this approach will only be considered where:</b></p> <ol style="list-style-type: none"> <li><b>a. The site location, characteristics or sustainable design justify a different approach; or</b></li> <li><b>b. A different approach is demonstrated to better meet housing needs in the area; or</b></li> <li><b>c. A different approach would expedite the delivery of housing needed to meet targets and is acceptable in other planning terms.</b></li> </ol> <p><b><u>The Council will support Self Build and Custom Build developments for residential accommodation in appropriate locations, in the interests of supporting high quality homes which meet the identified needs of the Borough.</u></b></p>	<p>Policy CS8 would not change the previous SA assessment as it only provides for another type of residential development.</p> <p><b>No further SA assessment required.</b></p>
Policy CS9: Previously Developed Land Target	<p>Changes to Policy CS9: Previously Developed Land</p> <p><b><u>From 2010 to the end of the plan period in 2027, at least 60% of development will take place on previously developed land. The Council will focus development on previously developed land first while recognising that greenfield land will need to be developed to meet its objectively assessed housing need and forecasted jobs growth. This reflects the locational strategy set out in Policy CS2, which focuses development primarily into central Ipswich. It will in turn be reflected in site allocations made in the Site Allocations and Policies (incorporating IP-One Area Action Plan) and Site Allocations and Policies development plan document.</u></b></p>	<p>The change in focus from seeking to develop 60% of development on previously developed land to focusing on previously developed land first weakens this policy. The policy still prioritises the re-use of PDL, but the removal of the target is a pragmatic and policy compliant response to the limited land supply in the Borough. This change in policy is based on:</p> <ul style="list-style-type: none"> <li>• Planning Policy Statement (PPS) 3 required that at least 60% of housing development should be on PDL but the National Planning Policy</li> </ul>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
		<p>Framework has removed this requirement. Local authorities may still continue to consider setting targets for the use of brownfield land.</p> <ul style="list-style-type: none"> <li>• However, in order to meet Ipswich's housing need, maintain a five year housing land supply and delivery of infrastructure at the Northern Fringe, the Council has changed the approach to the release of greenfield land to allow more of the land to come forward earlier in the plan period. Based on the housing trajectory, the Council would not be able to deliver 60% of development on PDL.</li> <li>• The 60% target also applied to employment land. The Cranes Factory, which was a PDL, is already being developed. To maintain a supply of employment sites in the Borough, the Site Allocations DPD propose two greenfield sites (Airport Farm (IP152)) and North of Whitton Lane (IP140b)).</li> </ul> <p>This policy may result in development of greenfield land and as such there will be negative impacts on:</p> <ul style="list-style-type: none"> <li>• ET2 (To conserve soil resources and quality)</li> <li>• ET8 (To conserve and enhance</li> </ul>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
		<p>biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs)</p> <ul style="list-style-type: none"> <li>• ET10 (To conserve and enhance the quality and local distinctiveness of landscapes and townscapes).</li> </ul> <p>The previous SA assessment scored against the following:</p> <ul style="list-style-type: none"> <li>• ET2 (To conserve soil resources and quality) (+);</li> <li>• ET8 (To conserve and enhance biodiversity) (-)</li> <li>• ET11 (To protect and enhance favourable conditions on SSSIs, SPAs and SACs) (+)</li> <li>• ET10 (To conserve and enhance the quality and local distinctiveness of landscapes and townscapes) (+)</li> </ul> <p>The change in text would therefore have negative impacts on biodiversity, soil resources and landscape whilst the assessments on other SA Objectives will remain unchanged.</p> <p><b>No further SA assessment required.</b></p>
Policy CS10: Ipswich Northern Fringe	Changes to Policy CS10: Ipswich Northern Fringe  <b>POLICY CS10: IPSWICH NORTHERN FRINGE</b>	The additional text in Policy CS10 provides details which were not assessed in the previous SA. These

Core Strategy Policies	Changes to Policies	Sustainability Impacts																
	<p><del>Land at the Northern Fringe of Ipswich, north of Valley Road/Colchester Road and between Henley Road in the west and Tuddenham Road in the east, will form a key component of the main source of supply of housing land in Ipswich during the plan period due to the limited availability of previously developed land after 2021.</del></p> <p><u>The site, identified on the Policies Map, consists of 195ha of land which will be developed as three neighbourhoods: a Northern neighbourhood (east of Henley Road and north of the railway line), a Southern neighbourhood (west of Westerfield Road and south of the railway line) and an Eastern neighbourhood (east of Westerfield Road). Over the plan period, the site will deliver land uses as set out below:</u></p> <table border="0" data-bbox="555 624 1536 1315"> <thead> <tr> <th data-bbox="555 624 1146 651"><u>Land use</u></th> <th data-bbox="1196 624 1536 651"><u>Approximate area in hectares</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="555 683 1146 710"><u>Public open space</u></td> <td data-bbox="1196 683 1536 710"><u>40</u></td> </tr> <tr> <td data-bbox="555 742 1146 801"><u>A Country Park (additional to the public open space above)</u></td> <td data-bbox="1196 742 1536 769"><u>24.5</u></td> </tr> <tr> <td data-bbox="555 833 1146 892"><u>Residential development of approximately 3,500 dwellings</u></td> <td data-bbox="1196 833 1536 860"><u>102</u></td> </tr> <tr> <td data-bbox="555 924 1146 951"><u>A District Centre providing:</u></td> <td data-bbox="1196 924 1536 951"><u>3.5</u></td> </tr> <tr> <td data-bbox="600 983 1146 1104">i. <u>A maximum of 2,000 sq m net of convenience shopping, to include a medium/large supermarket between 1,000 and 1,700 sq m net;</u></td> <td></td> </tr> <tr> <td data-bbox="600 1136 1146 1195">ii. <u>Up to 1,220 sq m net of comparison shopping;</u></td> <td></td> </tr> <tr> <td data-bbox="600 1227 1146 1315">iii. <u>Up to 1,320 sq m net of services uses including non-retail Use Class A1, plus A2 to A5 uses;</u></td> <td></td> </tr> </tbody> </table>	<u>Land use</u>	<u>Approximate area in hectares</u>	<u>Public open space</u>	<u>40</u>	<u>A Country Park (additional to the public open space above)</u>	<u>24.5</u>	<u>Residential development of approximately 3,500 dwellings</u>	<u>102</u>	<u>A District Centre providing:</u>	<u>3.5</u>	i. <u>A maximum of 2,000 sq m net of convenience shopping, to include a medium/large supermarket between 1,000 and 1,700 sq m net;</u>		ii. <u>Up to 1,220 sq m net of comparison shopping;</u>		iii. <u>Up to 1,320 sq m net of services uses including non-retail Use Class A1, plus A2 to A5 uses;</u>		<p>changes are significant and would require a new assessment.</p> <p><b>SA Assessment required.</b></p>
<u>Land use</u>	<u>Approximate area in hectares</u>																	
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Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p>iv. <u>A reserved site for a health centre;</u></p> <p>v. <u>A library;</u></p> <p>vi. <u>A police office;</u></p> <p>vii. <u>A multi-use community centre; and</u></p> <p>viii. <u>Appropriate residential accommodation in the form of upper floor apartments.</u></p> <p><u>Two Local Centres together providing:</u></p> <p>i. <u>Up to 500 sq m net of convenience retail floorspace</u></p> <p>ii. <u>Up to 600 sq m net of comparison retail floorspace; and</u></p> <p>iii. <u>Up to 500 sq m net of service uses including non-retail Use Class A1, plus Classes A2 to A5.</u></p> <p><u>A secondary school within the Eastern neighbourhood</u></p> <p><u>Three Primary schools</u></p> <p><u>Primary road infrastructure, including a road bridge over the railway to link the Northern and Southern neighbourhoods</u></p> <p><u>Total</u></p> <p><u>The broad distribution of land uses is indicated on the Policies Map. The detailed strategic</u></p>	<p><u>1.5 including 0.5ha per local centre in the Northern and Eastern neighbourhoods and 0.5ha within the Northern neighbourhood for the country park visitor centre / community centre.</u></p> <p><u>9</u></p> <p><u>6</u></p> <p><u>8.5</u></p> <p><u>195</u></p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p><u>and neighbourhood infrastructure requirements for the development and the triggers for their delivery are included in Table 8B in Chapter 10.</u></p> <p><del>However, due to the limited availability of previously developed land in the rest of the town, the delivery of 1,000 dwellings will be expected to commence prior to 2021 on land to the east of Henley Road and south of the railway line. A prerequisite for any development being granted planning permission in the Northern Fringe will be the prior adoption preparation by the Council of a supplementary planning document providing a development brief to:</del></p> <ol style="list-style-type: none"> <li>a. <del>guide the development of the whole Northern Fringe area;</del></li> <li>b. <del>identify <u>amplify</u> the infrastructure that developments will need to deliver on a comprehensive basis alongside new housing, including community facilities and, at an appropriate stage, the provision of a railway crossing to link potential development phases, in the interests of sustainability and integration;</del></li> <li>c. <del>identify the detailed location of a district and two local centres and other supporting infrastructure; and</del></li> <li>d. <del>indicate provide guidance on the sequencing of housing and infrastructure delivery required for the development set out a schedule of infrastructure charges.</del></li> </ol> <p><del>The Borough Council will start to prepare the supplementary planning document as soon as the Core Strategy is adopted.</del></p> <p>Any development will maintain an appropriate physical separation of Westerfield village from Ipswich and include green walking and cycling links to Westerfield station, and provide the opportunity for the provision of a country park within the Northern Fringe as envisaged by CS16 and as shall be more particularly identified in the SPD.</p> <p><u>The land to the west of Tuddenham Road north of the railway line is allocated for the replacement playing fields necessary to enable development of the Ipswich School playing field site as part of the Northern Fringe development.</u></p>	

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p><del>Should housing delivery be falling significantly short of requirements, the Council would at that time need to consider allowing additional land in the Northern Fringe to be released for development prior to 2021.</del></p>	
<p>Policy CS11: Gypsy and Traveller Accommodation</p>	<p>Changes to Policy CS11: Gypsy and Traveller Accommodation</p> <p>Provision will be found within the Ipswich Policy Area for additional <u>permanent</u> pitches to meet <del>any shortfall in provision required by Regional Spatial Strategy to 2021, and thereafter such further</del> <u>the need as may be will be</u> identified through the Gypsy and Travellers Accommodation Assessment. <del>(or such other review mechanisms as shall replace it).</del> Sites will be allocated through the Site Allocation <u>and Policies (incorporating and IP-One Area Action Plan AAP)</u> development plan document <u>DPDs to meet need in the first five years.</u></p> <p>Sites for additional Gypsy and Traveller pitches will be assessed against the following criteria.</p> <p>a. The site should be located:</p> <ul style="list-style-type: none"> <li>i. where it would be well served by the road network; and</li> <li>ii. where possible, within 1km of basic services including the public transport network.</li> </ul> <p>b. The site should be:</p> <ul style="list-style-type: none"> <li>i. accessible safely on foot, by cycle and by vehicle;</li> <li>ii. large enough to allow business activities to be carried out;</li> <li>iii. free from flood risk and significant contamination;</li> <li>iv. safe and free from pollution;</li> <li>v. capable of being cost effectively drained and serviced, including with waste disposal and recycling facilities;</li> <li>vi. proportionate in size to any nearby settlements, to support community cohesion; and</li> <li>vii. where possible, located on previously developed land.</li> </ul> <p>c. The site should not have a significant adverse impact on:</p>	<p>The changes to Policy CS11 text would not change the previous SA assessment as these are minor updates to the policy.</p> <p>No further SA assessment required.</p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<ul style="list-style-type: none"> <li>i. the residential amenity of immediate or close neighbours;</li> <li>ii. the appearance and character of the open countryside or conservation areas;</li> <li>iii. sites designated to protect their nature conservation, <u>ecological networks</u>, geological, historic or landscape qualities; and</li> <li>iv. the physical and social infrastructure of local settlements.</li> </ul> <p>Site identification will be carried out in consultation with the Gypsy and Traveller and settled communities. Site size and design will be in accordance with government guidance.</p> <p><del>In line with the GTAA Regional Spatial Strategy, the</del> The Council will work with Suffolk County Council and neighbouring authorities to develop a the South Suffolk transit site between Ipswich and Felixstowe.</p> <p>The needs of travelling showpeople will be kept under review. Applications for new sites will be assessed against criteria a. to c. above.</p>	
Policy CS12: Affordable Housing	<p>Changes to Policy CS12: Affordable Housing</p> <p><b>The Council will work with partners to provide affordable housing to meet identified needs in Ipswich. All new developments of 10 dwellings or more (or on housing sites of 0.3ha or more) are required to include provision for affordable housing (based on percentages of floorspace, not dwelling numbers) as follows:</b></p> <ul style="list-style-type: none"> <li>a. 35% affordable housing provision in schemes of 15 or more dwellings or 0.5ha or more; and</li> <li>b. 20% affordable housing provision in schemes of between 10 and 14 dwellings or 0.3 to 0.49 ha.</li> </ul> <p><b>At least 80% of affordable housing provision should consist of social rented housing (<u>excluding intermediate housing</u>), subject to viability.</b></p> <p><b>The Council will only consider reducing the requirement for the proportion of affordable housing in an open market development where an independent <u>viability</u> assessment of the applicant's development costs is carried out at the applicant's expense, which justifies a local</b></p>	<p>The additional text to the Policy CS12 would not change the previous SA assessment as these only clarify the Council's position.</p> <p><b>No further SA assessment required.</b></p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p><b><u>percentage figure on viability grounds, where the Council disputes the applicant's conclusions.</u></b></p>	
<p>Policy CS13: Planning for Jobs Growth</p>	<p>Changes to Policy for CS13: Planning for Jobs Growth</p> <p><b>POLICY CS13: PLANNING FOR JOBS GROWTH</b></p> <p><b>The Council will promote sustainable economic growth in the Ipswich Policy Area, <u>with a focus on the delivery of jobs within the Borough</u>. It will encourage the provision <u>of in the region</u> of at least <u>12,500 18,000</u> jobs between <u>2011 2004</u> and <u>2031 2025</u> by:</b></p> <ul style="list-style-type: none"> <li>a. allocating at least 30ha of land for employment development (in Use Classes B1, B2 and B8) through the <u>Site Allocations and Policies (incorporating IP-One Area Action Plan) and Site Allocations and Policies</u> development plan documents;</li> <li>b. protecting for employment uses <u>in</u> existing employment areas, which will be identified through the <u>Site Allocations and Policies (incorporating IP-One Area Action Plan) and Site Allocations and Policies</u> development plan documents and on the proposals map;</li> <li>c. allocating land for other employment-generating uses including education, <u>leisure, tourism and hospitality, and retail development and leisure development</u>, through the <u>Site Allocations and Policies (incorporating IP-One Area Action Plan) and Site Allocations and Policies</u> development plan documents;</li> <li>d. allocating 16.7ha of land at the site of the former Crane's factory at Nacton Road as a strategic employment site, with the principal access taken from Ransomes Way. The site will be safeguarded for B1, B2 and B8 uses. Other uses would only be permitted if they secure the delivery of the strategic employment site;</li> <li>e. supporting the growth of University Campus Suffolk and Suffolk New College in order to raise skills and qualifications levels in the workforce; and</li> <li>f. taking a lead with local partners to ensure that coordinated action is taken to encourage sustainable economic growth and protect local jobs, and by drawing up</li> </ul>	<p>The changes to the employment figures in Policy CS13 are significant changes not assessed in the previous SA. The impacts of these changes may have a significant effect on economic and social SA objectives.</p> <p><b>SA assessment required.</b></p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p align="center"><b>a delivery plan with local partners to ensure these aims are implemented.</b></p>	
Policy CS14: Retail Development	<p>Changes to Policy CS14: Retail Development</p> <p><b>The Council will promote high quality investment and development in Ipswich Central Shopping Area, to maintain and enhance its attraction and market share, and strengthen its regional role.</b></p> <p><b><u>Through the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document, the Council intends to will extend the Central Shopping Area to include the Westgate quarter and the land south of Crown Street and Old Foundry Road and allocate sites for retail development within it. This will enable the delivery in the region of at least 15,000 35,000 sq m net of additional floorspace to diversify and improve the retail offer. Further allocations will be made through the Site Allocations DPD review following a review of the Retail capacity study to address provision after 2026.</u></b></p> <p><b>Major Retail development over 200 sq m net in edge of centre or out of centre locations will be considered in light of national policy and the Council's aim to enhance the role, vitality and viability of Ipswich Central Shopping Area.</b></p> <p><b>The Council will direct other town centre uses including offices, leisure, arts, culture, tourism and hotel developments into an extended town centre area, with some provision being appropriate in the CSA and Waterfront, in recognition of the area's good accessibility by public transport, cycle and foot.</b></p> <p><b>The Council will also promote environmental enhancements and urban greening to the town centre and improved public transport accessibility.</b></p> <p><b>In the district centres and local centres, the Council will permit retail development of a scale appropriate to their size, function and catchment.</b></p>	<p>Changes to the proposed floorspace figures in Policy CS14 may have significant effects not assessed in the previous SA. The policy also now seeks to direct retail uses to the CSA and Waterfront, which was not assessed in the previous SA. For these reasons, a new assessment would be required to assess any significant effects on environmental, economic and social SA objectives.</p> <p><b>SA assessment required.</b></p>
Policy CS15: Education Provision	<p>Changes to Policy CS15: Education Provision</p> <p><b>The Council will continue to support the development of educational facilities at Suffolk New College and University Campus Suffolk. Land for the further development of these facilities,</b></p>	<p>The additional text to the Policy CS15 would not change the previous SA assessment as these update the policy and clarify the elements that would be</p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p><del>specifically the existing campus site and Phase 3 of the University scheme of development, will be identified and safeguarded for education use through the <u>Site Allocations and Policies (Incorporating IP-One Area Action Plan) development plan document.</u></del></p> <p><del>The Council also supports the development of a new 14–19 centre outside the Borough near Copdock, to serve the western half of Ipswich, as well as large parts of South Suffolk.</del></p> <p>The Council supports the upgrading of education facilities and will seek to ensure that community access to school facilities is maximised. Should school facilities become redundant, any application for a non-community use will need to be supported by evidence that the facility and site is no longer needed for community uses.</p> <p>New primary schools <u>provision</u> will be needed to meet the demands of growth. Sites for new <u>or extended</u> primary schools in <del>both east and west</del> Ipswich will be identified through the <u>Site Allocations and Policies (incorporating IP-One Area Action Plan) and/or Site Allocations and Policies</u> development plan document.</p> <p>Any additional nursery and children's centre provision will be encouraged to locate within or adjacent to District and Local Centres <u>or co-located within schools</u> in order to facilitate linked trips by parents. The sustainable location of such facilities so that they are accessible by walking, cycling or public transport will be a requirement.</p> <p>Any education needs associated with development at the Northern Fringe will be identified and sites safeguarded through the development brief to be prepared as a supplementary planning document.</p>	<p>considered in the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.</p> <p><b>No further SA assessment required.</b></p>
<p>Policy CS16: Green Infrastructure, Sport and Recreation</p>	<p>Changes to Policy CS16: Green Infrastructure, Sport and Recreation</p> <p><b>The Council will <u>safeguard, protect, and enhance biodiversity and the environment by working in partnership with others to ensure that our parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefitting the whole community.</u> The Council will <u>enhance</u> and extend the <u>ecological</u> network of <del>green corridors</del>, open spaces, sport and recreation facilities for the benefit of biodiversity,</b></p>	<p>The additional text to the Policy CS16 would not change the previous SA assessment as these mainly strengthen ecological objectives.</p> <p><b>No further SA assessment required.</b></p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p>people and the management of local flood risk. It will do this by:</p> <ul style="list-style-type: none"> <li>a. requiring all developments to contribute to the provision of open space according to the Borough's standards, identified strategic needs and existing deficits in an area;</li> <li>b. requiring major new developments to include on-site public open spaces and wildlife habitat. On-site provision must create a network or corridor with existing green infrastructure where such a <u>an ecological</u> network exists beyond the site boundaries;</li> <li>c. supporting proposals or activities that protect, enhance or extend open spaces and sport and recreation facilities;</li> <li>d. working with partners to prepare and implement management plans for green spaces, including visitor management plans for key parts of European sites within the Suffolk Coast and Heaths AONB to be completed by 2015, and a plan for Orwell Country Park that will result in a reduced impact upon birds in the Orwell Estuary;</li> <li>e. supporting the Greenways Project in working with communities and volunteers to manage green corridors in Ipswich;</li> <li>f. <u>support the enhancement of canopy cover and ecological networks;</u></li> <li>g. working with partners to improve green infrastructure provision and link radial <u>ecological networks</u> <del>green corridors</del> with a publicly accessible green rim around Ipswich;</li> <li>h. working with partners to ensure the provision of a new country park in the urban fringe of north eastern Ipswich (e.g. within any Northern Fringe development - see Policy CS10);</li> <li>i. promoting improved access to existing facilities where appropriate; and</li> <li>j. reviewing the town's estate of sports facilities to consider how they can best meet the</li> </ul>	

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p>needs of a growing population.</p> <p>The <u>Site Allocations and Policies (incorporating IP-One Area Action Plan) and Site Allocations and Policies</u> development plan document will identify existing, new and proposed open spaces, sport and recreation facilities and <u>ecological networks green corridors</u>.</p>	
<p>Policy CS17: Delivering Infrastructure</p>	<p>Changes to Policy CS17: Delivering Infrastructure</p> <p><b>The Council will require all developments to meet the on- and off-site infrastructure requirements needed to support the development and mitigate the impact of the development on the existing community and environment.</b></p> <p><b><u>Each development will be expected to meet site related infrastructure needs and where</u></b> <b><u>Where the provision of new, or the improvement or extension of existing off- site infrastructure is needed to support a new development or mitigate its impacts, each developments will be required to contribute proportionately through a <u>Section 106 Agreement commuted sum or CIL standard charge.</u></u></b></p> <p><b><del>A supplementary planning document will be prepared that sets out:</del></b></p> <ul style="list-style-type: none"> <li><b><del>• the level and types of charges to be included within the standard charge;</del></b></li> <li><b><del>• how the figures have been calculated;</del></b></li> <li><b><del>• which types of development would be expected to contribute to each category of infrastructure; and</del></b></li> <li><b><del>• a detailed infrastructure strategy and delivery plan.</del></b></li> </ul> <p><b><del>Each development will be expected to meet site related infrastructure needs outside the standard charge approach. Affordable housing and on-site open space provision will continue to be dealt with through planning obligations.</del></b></p>	<p>The additional text to Policy CS17 requires each development to meet site related infrastructure needs, which is a significant change. The policy also sets out the application of Section 106 agreements and includes changes to the broad categories of infrastructure to be included in the standard charge.</p> <p><b>SA assessment required.</b></p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p><del>The standard charge <u>Section 106 Agreements</u> will apply to all <u>major developments and some minor developments</u> but may be varied according to:</del></p> <p>a. <del>the scale and nature of the development and its demonstrated viability; and</del></p> <p>b. <del>whether <u>or not a planning obligation meets all of the statutory reasons ('tests') for granting planning permission</u> on-site provision of infrastructure meets the needs of the development and/or the needs of a wider area beyond the site itself.</del></p> <p><del>Agreed charges will be secured through a Section 106 Agreement.</del></p> <p>The broad categories of infrastructure to be included in the standard charge are as follows and detailed further in Appendix 5:</p> <ol style="list-style-type: none"> <li>1. <u>highways and transport</u>;</li> <li>2. <u>childcare, early years and education from early years to lifelong learning</u>;</li> <li>3. <u>health and emergency services adult care</u>;</li> <li>4. <u>environment and conservation including waste collection and disposal</u>;</li> <li>5. <u>community and cultural facilities culture</u>;</li> <li>6. <u>sport and recreation</u>;</li> <li>7. <u>economic development; and community and community safety</u>;</li> <li>8. <u>utilities emergency services</u></li> <li>9. <u>conservation; and</u></li> <li>10. <u>economic development.</u></li> </ol> <p>Key strategic infrastructure requirements needed to deliver the objectives of the Core Strategy include the following (not in priority order):</p> <ul style="list-style-type: none"> <li>• Ipswich flood defences;</li> <li>• sustainable transport measures e.g. <del>additional park and ride</del>, the Ipswich Major Scheme '<u>Travel Ipswich</u>' and accessibility improvements between the Central Shopping Area, Waterfront and railway station;</li> <li>• measures to increase east-west capacity in the transport system to ease congestion;</li> </ul>	

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<ul style="list-style-type: none"> <li>• strategic education provision of new schools;</li> <li>• strategic green infrastructure including a country park;</li> <li>• sports and leisure facilities serving the whole Borough;</li> <li>• community facilities including GP surgeries and health centres;</li> <li>• water management infrastructure;</li> <li>• new primary electricity substation in Turret Lane; and</li> <li>• town centre environmental enhancements.</li> </ul> <p>There will be specific requirements linked to the Northern Fringe that will be identified in the development brief supplementary planning document that will be prepared in advance of any development taking place there.</p>	
Policy CS18: Strategic Flood Defence	There are no changes to Policy CS18: Strategic Flood Defence	<p>There are no changes to Policy CS18 and therefore would not change the previous SA Assessment.</p> <p><b>No further SA assessment required.</b></p>
Policy CS19: Provision of Health Services	<p>Changes to Policy CS19: Provision of Health Services</p> <p><b>The Council supports the bringing together of health sector facilities onto the Heath Road Hospital site.</b></p> <p><b>Proposals for development at Heath Road shall be accompanied by a strategy that includes a satisfactory travel plan and measures to address local car parking issues.</b></p> <p><b>In the case of the St Clement's Hospital site, the Council is satisfied that part of the site is no longer needed for health facilities, subject to related health facilities being acceptably relocated first. A detailed site allocation for alternative use on 12.57ha of the site will be made in the Site Allocations and Policies <u>(incorporating IP-One Area Action Plan) development plan document.</u></b></p>	<p>The additional text to the Policy CS19 would not change the previous SA assessment as these only update the policy regarding the Site Allocations and Policies (incorporating IP-One Area Action Plan development plan document.</p> <p><b>No further SA assessment required.</b></p>

Core Strategy Policies	Changes to Policies	Sustainability Impacts
	<p>Proposals to develop additional, new local health facilities such as GP surgeries will be acceptable provided that they are located in or adjacent to the town centre or a district or local centre. Exceptions will only be permitted where the applicant can demonstrate to the Council's satisfaction that the location would be fully accessible by all modes of transport, and would serve the patients or fill a gap in existing provision more effectively than any other better located and realistically available site.</p>	
Policy CS20: Key Transport Proposals	<p>Changes to Policy CS20: Key Transport Proposals</p> <p><b>The Council supports the <u>Travel Ipswich 'Ipswich: Transport Fit for the 21<sup>st</sup> Century'</u> scheme, which aims to reduce dependency on the private car by 15% within the lifetime of the Plan. This will improve bus station provision, passenger information, shuttle bus provision and pedestrian links between the Central Shopping Area, the railway station and Waterfront.</b></p> <p><b>The Council also supports the completion of the upgrading of the Felixstowe to Nuneaton rail line. To assist with this the Council will protect, for rail use, the line of the 'Bacon Chord' near Hadleigh Road, Ipswich.</b></p> <p><b>In the short term the Council will look to close the Waterfront Northern Quays route to general traffic, maintaining access only for pick up/drop off and the shuttle bus.</b></p>	<p>The changes to Policy CS20 would not change the previous SA assessment as these only update the policy.</p> <p><b>No further SA assessment required.</b></p>

**Table C-2 Sieve analysis of changes to Development Management Policies**

Development Management Policies	Changes to Policy	Sustainability Impacts
Policy DM1:	Changes to Policy DM1	The changes to Policy DM1 would not change the previous

Sustainable Development	<p><b>All new residential and non-residential buildings shall be required to achieve a high standard of environmental sustainability.</b></p> <p><b>In this regard all developments exceeding the thresholds set out below shall achieve the following standards as a minimum unless, in exceptional circumstances, it can be clearly demonstrated that this is either not feasible or not viable:</b></p> <p><b>TABLE 6 to be read in conjunction with Policy DM1</b></p> <table border="1" data-bbox="434 483 1621 903"> <thead> <tr> <th rowspan="2">Timescales (grant of planning permission)</th> <th colspan="2">All dwellings (including apartments)</th> <th rowspan="2">All other <u>mixed</u> residential and non-residential development with a</th> </tr> <tr> <th>Developments of between 1 and 249 dwellings</th> <th>Developments of 250 dwellings or more</th> </tr> </thead> <tbody> <tr> <td>From 2010</td> <td>Level 3 of the CfSH</td> <td>Level 4 of the CfSH</td> <td>BREEAM "Very Good"</td> </tr> <tr> <td>From 2013 - 2016</td> <td>Level 4 of the CfSH</td> <td>Level 5 of the CfSH</td> <td>BREEAM "Excellent"</td> </tr> <tr> <td>From 2016 onwards</td> <td>Level 6 of the CfSH</td> <td>Level 6 of the CfSH</td> <td>BREEAM "Excellent"</td> </tr> </tbody> </table>	Timescales (grant of planning permission)	All dwellings (including apartments)		All other <u>mixed</u> residential and non-residential development with a	Developments of between 1 and 249 dwellings	Developments of 250 dwellings or more	From 2010	Level 3 of the CfSH	Level 4 of the CfSH	BREEAM "Very Good"	From 2013 - 2016	Level 4 of the CfSH	Level 5 of the CfSH	BREEAM "Excellent"	From 2016 onwards	Level 6 of the CfSH	Level 6 of the CfSH	BREEAM "Excellent"	<p>SA assessment as these only update the policy.</p> <p><b>No further SA assessment required.</b></p>
Timescales (grant of planning permission)	All dwellings (including apartments)		All other <u>mixed</u> residential and non-residential development with a																	
	Developments of between 1 and 249 dwellings	Developments of 250 dwellings or more																		
From 2010	Level 3 of the CfSH	Level 4 of the CfSH	BREEAM "Very Good"																	
From 2013 - 2016	Level 4 of the CfSH	Level 5 of the CfSH	BREEAM "Excellent"																	
From 2016 onwards	Level 6 of the CfSH	Level 6 of the CfSH	BREEAM "Excellent"																	
Policy DM2: Decentralised Renewable or Low Carbon Energy	<p>Changes to Policy DM2: Decentralised Renewable or Low Carbon Energy</p> <p><b>All new build development of 10 or more dwellings or in excess of 1,000 sq. m of other residential or non-residential floorspace shall provide at least 15% of their energy requirements from decentralised and renewable or low-carbon sources. If it can be clearly demonstrated that this is not either feasible or viable, the alternative of reduced provision and/or equivalent carbon reduction in the form of additional energy efficiency measures will be required expected. The design of development should allow for the development of feed in tariffs.</b></p>	<p>The change to Policy DM2 would not change the previous SA assessment as the change is very minor.</p> <p><b>No further SA assessment required.</b></p>																		
Policy DM3: Provision of Private Outdoor	<p>There is no change to Policy DM3: Provision of Private Outdoor Amenity Space in New and Existing Developments</p>	<p><b>No further SA assessment required.</b></p>																		

Amenity Space in New and Existing Developments		
Policy DM4: Development and Flood Risk	<p>Change to Policy DM4: Development and Flood Risk</p> <p><b>Development will only be approved where it can be demonstrated that the proposal satisfies all the following criteria:</b></p> <ul style="list-style-type: none"> <li><b>a. it does not increase the overall risk of all forms of flooding in the area through the layout and form of the development and appropriate application of Sustainable Urban Drainage Systems (SUDS SuDS);</b></li> <li><b>b. it will be adequately protected from flooding in accordance with adopted standards wherever practicable;</b></li> <li><b>c. it is and will remain safe for people for the lifetime of the development; and</b></li> <li><b>d. it includes water efficiency measures such as rainwater harvesting, or use of local land drainage water where practicable.</b></li> </ul>	<p>The change to Policy DM4 would not change the previous SA assessment as the change is very minor.</p> <p><b>No further SA assessment required.</b></p>
Policy DM5: Urban Design Quality	<p>Change to Policy DM5: Urban Design Quality</p> <p><b>The Council will require all new development to be well designed and sustainable. In Ipswich this will mean:</b></p> <ul style="list-style-type: none"> <li><b>a. layouts and designs that provide a safe, attractive, permeable, legible and useable public realm for all users, which is pedestrian and cycle orientated;</b></li> <li><b>b. areas which function well and where possible integrate residential, working and community environments and fit well with adjoining areas;</b></li> <li><b>c. the promotion of safe and secure communities;</b></li> <li><b>d. greener streets and spaces to contribute to local biodiversity, visual amenity,</b></li> </ul>	<p>The change to Policy DM5 would not change the previous SA assessment as the change is very minor, incorporating accessibility.</p> <p><b>No further SA assessment required.</b></p>

	<p>and health and well-being, and offset the impacts of climate change;</p> <p>e. protecting and enhancing the special character and distinctiveness of Ipswich and helping to reinforce the attractive physical characteristics of local neighbourhoods;</p> <p>f. buildings that exhibit very good architectural quality, are highly sustainable and accessible and are designed for long life by being capable of adaptation to accommodate changing needs and uses over time;</p> <p>g. ensuring that new development incorporates cycle and waste storage, public transport infrastructure and car parking if appropriate, all designed and integrated in a way that supports the street scene and safeguards amenity; and</p> <p>h. new buildings in or around Air Quality Management Areas will be designed so that their size and layout will minimise, and at the very least not increase, localised retention of polluting emissions, and will include ventilation systems that protect the health of users of the buildings.</p> <p><b>Design that is considered not to adequately meet all these criteria will be refused.</b></p>	
Policy DM6: Tall Buildings	There is no change to Policy DM6: Tall Buildings	No further SA assessment required.
DM7: Public Art	There is no change to Policy DM7: Public Art	No further SA assessment required.
Policy DM8: Conservation Areas	<p>Change to Policy DM8: Conservation Areas</p> <p><b>The Council will seek to protect and enhance the character and appearance of <u>conservation areas</u> through adopted Conservation Area Appraisals and Management Plans. These will be used to inform the Council's decisions when assessing the impact of proposals for planning permission.</b></p>	<p>The change to Policy DM8 would not change the previous SA assessment as the change is very minor.</p> <p><b>No further SA assessment required.</b></p>

<p>Policy DM9: Buildings of Townscape Interest</p>	<p>There is no change to Policy DM9: Buildings of Townscape Interest</p>	<p><b>No further SA assessment required.</b></p>
<p>Policy DM10: Protection of Trees and Hedgerows</p>	<p>Changes to Policy DM10: Protection of Trees and Hedgerows</p> <p><b><u>The Council will protect and ensure the care of and retain trees and increase canopy cover in the interests of amenity and biodiversity by:</u></b></p> <ul style="list-style-type: none"> <li>a. <b>making Tree Preservation Orders; and</b></li> <li>b. <b>only granting consent for felling, topping, lopping or uprooting if a sound arboricultural reason is provided;</b></li> <li>c. <b><u>adhering to the principles of BS3998 ‘Tree work – Recommendations’ 2010 for established tree management options (including soil care and tree felling);</u></b></li> <li>d. <b><u>refusing planning permission for development resulting in the loss or deterioration of aged or veteran trees found outside ancient woodland unless the need for, and benefits of, the development in that location clearly outweigh the loss; and</u></b></li> <li>e. <b><u>encouraging tree planting to help achieve a target of 22% canopy cover by 2050.</u></b></li> </ul> <p><b>Applications for development should retain existing trees and hedgerows of amenity or biodiversity value where possible. Where development affecting trees is proposed, the application must be accompanied by:</b></p> <ul style="list-style-type: none"> <li>f. <b>an accurate survey and assessment of all existing trees on site in accordance with BS5837 <u>‘Trees in relation to design, demolition and construction – Recommendations’ 2012 by a competent arborist “Guide for Trees in Relation to Construction” 1991;</u></b></li> <li>g. <b>details of protective measures to be put in place during the development process to ensure the health and safety of each specimen to be retained;</b></li> </ul>	<p>The changes to Policy DM9 would not change the previous SA assessment as the changes simply updates and strengthens the policy with regards to canopy cover, trees outside ancient woodland, landscaping and amenity.</p> <p><b>No further SA assessment required.</b></p>

	<p style="text-align: center;"><b>and</b></p> <p><b>h. where removal is proposed, a plan for replacement planting on a two for one basis and using semi-mature specimens, unless otherwise agreed by the Council.</b></p> <p style="text-align: center;"><b><u>Design in new development should have proper regard to the setting of protected trees. Landscaping and tree planting should be integrated into new development.</u></b></p>	
Policy DM11: Central Ipswich Skyline	There are no changes to Policy DM11: Central Ipswich Skyline	<b>No further SA assessment required.</b>
Policy DM12: Extensions to Dwellinghouses and the Provision of Ancillary Buildings	There are no changes to Policy DM12: Extensions to Dwellinghouses and the Provision of Ancillary Buildings	<b>No further SA assessment required.</b>
Policy DM13: Small Scale Infill and Backland Residential Developments	There are no changes to Policy DM13: Small Scale Infill and Backland Residential Developments	<b>No further SA assessment required.</b>
Policy DM14: The Subdivision of Family Dwellings	<p>Changes to Policy DM14: The Subdivision of Family Dwellings</p> <p style="text-align: center;"><b>Development involving the conversion of houses into flats, bedsits or houses in multiple occupation will be permitted provided that it:</b></p> <p><b>a. provides sufficient car parking in accordance with the standards, secure and lit bicycle storage, amenity space and refuse, recycling and garden waste container storage is provided for each unit;</b></p>	<p>The changes to Policy DM14 would not change the previous SA assessment as the changes simply update the policy and includes a provision on amenity.</p> <p><b>No further SA assessment</b></p>

	<p><b>b. incorporates a convenient principal entrance door for each unit of accommodation and provides an appropriate standard of residential accommodation;</b></p> <p><b>c. would not lead to an overload of flats, bedsits or houses in multiple occupation in a particular area causing unacceptable levels of traffic congestion or activity;</b></p> <p><b>d. would not lead to detriment to a listed building <u>and/or</u> conservation area <del>or the amenity of neighbouring residents</del>;</b></p> <p><b>e. <u>would not lead to detriment of the amenity of neighbouring residents though careful consideration of internal layouts</u>; and</b></p> <p><b>f. would not result in the conversion of small or modest sized family houses containing 3 bedrooms or fewer or having a floorspace of less than 100 sq.m.</b></p>	required.
Policy DM15: Travel Demand Management	There are no changes to Policy DM15: Travel Demand Management	No further SA assessment required.
Policy DM16: Sustainable Transport Modes	There are no changes to Policy DM16: Sustainable Transport Modes	No further SA assessment required.
Policy DM17: Transport and Access in New Developments	There are no changes to Policy DM17: Transport and Access in New Developments	No further SA assessment required.
Policy DM18: Car Parking	There are no changes to Policy DM18: Car Parking	No further SA assessment required.
Policy DM19:	There are no changes to DM19: Cycle Parking	No further SA assessment

Cycle Parking		required.
Policy DM20: The Central Shopping Area	<p>Changes to Policy DM20: The Central Shopping Area</p> <p><b>The Council will support the town's vitality and viability by promoting and enhancing appropriate development in the Central Shopping Area.</b></p> <p><b>The Central Shopping Area comprises the Primary, Secondary and Specialist Shopping Areas, which will be defined through the <u>Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document</u>. Sites identified as suitable for major retail investment will be allocated in the <u>Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document</u>.</b></p> <p><b>Class A1 retail use should remain the predominant use at all times in the Central Shopping Area, to ensure the strategic retail function of Ipswich is maintained. A2-A5 retail uses and other main town centre uses will also be supported in the <u>Secondary and Specialist Shopping Areas</u>, provided the overall percentage of the frontage does not exceed the levels specified below and accords with the criteria set out below. <u>A1-A5 A2-A5 uses and other main town centre uses</u> are defined in the Glossary.</b></p> <p><b>a. Primary Shopping Area – <u>A2-A4 A2-A5 retail uses</u> will be permitted where they will not exceed 10% of a group of identified ground floor frontages and ground and first floor frontages in the <u>Buttermarket and Tower Ramparts Shopping Centres</u> and the site is not adjacent to an existing non-A1 retail use within the same Use Class as the proposal. A5 uses will not be permitted.</b></p> <p><b>b. Secondary Shopping Area - <u>A2-A5 retail uses and other main town centre uses</u> will be permitted where they will not exceed 25% of a group of identified ground floor frontages, and provided the proposal does not create a concentration of more than 30 metres of non-A1 retail frontage, and the site is not adjacent to an existing non-A1 retail use within the same Use Class as the proposal. Of this 25%, no more than 10% of the total identified ground floor frontage will be permitted for A4 or A5 uses.</b></p> <p><b>c. Specialist Shopping Area - <u>A2-A5 retail uses and other main town centre uses</u> will</b></p>	<p>The changes to Policy DM20 would not change the previous SA assessment as the changes simply update the policy and provide further clarification.</p> <p>No further SA assessment required.</p>

	<p>be permitted where they will not exceed 40% of a group of identified ground floor frontages. Of this 40%, no more than 35% of the total identified ground floor frontage will be permitted for <u>A2, A4 or A5</u> uses.</p> <p><u>A3, A4 and A5 uses and other main town centre uses</u> will only be permitted where they have no detrimental effect on the amenities of nearby residential accommodation in terms of noise, fumes, smell, litter and general activity generated from the use <u>and retain an active frontage</u>.</p> <p>Mixed use development, including B1 office, A2 financial and professional services, C3 housing, and C1 hotel or any combination of these uses will be supported in the Central Shopping Area, provided there is a ground floor <del>retail</del> use in accordance with the above.</p> <p>Within Primary and Secondary Shopping Area, the Council will not grant planning permission for the use of a ground floor unit to a use falling outside classes A1 to A5 <u>in Primary Shopping Areas and A1 to A5 and other main town centre uses in Secondary Shopping Areas</u>.</p> <p><u>The Council is currently consulting on proposals to redevelop the Cornhill. The results of the study will be taken into account when applying frontage policies in this area.</u></p> <p>The Council also supports the retention of the open market.</p>	
<p>Policy DM21: District and Local Centres</p>	<p>Changes to Policy DM21: District and Local Centres</p> <p><b>The Council will support the retention and provision of local shops and community facilities within defined District and Local Centres.</b></p> <p><b>Within the defined District and Local Centres:</b></p> <p>a. <b>proposals for the provision of additional shops or extensions to existing shops will be permitted provided they are of a scale appropriate to the centre. The requirements of the National Planning Policy Framework (NPPF) <u>Planning Policy Statement 4 (PPS4)</u> should be satisfied;</b></p>	<p>The changes to Policy DM21 would not change the previous SA assessment as the changes simply update the policy and provide requirements for change of use and include new proposals for local centres.</p> <p><b>No further SA assessment</b></p>

	<p>b. <b>proposals for change of use from A1 to <u>A2-A5 retail uses and sui generis uses appropriate to a centre, including laundrettes</u> will be permitted where they will not exceed 40% of the total identified ground floor frontage, provided the identified shopping frontage or the shopping character and range of shops is not unacceptably diminished. Of this 40%, no more than 20% of the total identified ground floor frontage will be permitted for A4 or A5 uses;</b></p> <p>c. <b>proposals for the change of use of ground floor units to community facilities will be permitted provided that:</b></p> <ul style="list-style-type: none"> <li>i. <b>the unit does not occupy a prominent position in the Centre;</b></li> <li>ii. <b>satisfactory vehicular access and car parking can be provided;</b></li> <li>iii. <b>the unit has suffered from a clearly demonstrated long-term vacancy for a period of at least 12 months. <u>A marketing strategy for the unit must be agreed with the Local Planning Authority prior to its implementation and the agreed strategy implemented for a minimum period of 12 months prior to applying for planning permission for change of use or redevelopment. Any such application must be accompanied by an independent appraisal of the economic viability of the facility in its current use;</u> and</b></li> <li>iv. <b>the physical treatment of the unit minimises the problem of dead frontages or is appropriate to the proposed use.</b></li> </ul> <p>d. <b><u>Residential uses will not be permitted on ground floor unless it has been clearly demonstrated the unit has suffered from long term vacancy for at least 12 months and none of the uses stated in paragraphs a, b and c are suitable, viable or deliverable.</u></b></p> <p><b>Outside District Centres but within a 400m straight line distance of the centre the provision of community facilities will be permitted provided the facility:</b></p> <p>e. <b>is appropriate in scale and supports the needs of the adjacent residential area;</b></p>	<p>required.</p>
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	<p>f. is accessible to all sectors of the community; and</p> <p>g. offers satisfactory vehicular access and car parking space in accordance with the Council's standards.</p> <p><b><u>One Two new District Centres are is proposed within the plan period at, 1) Sproughton Road and 2) Duke Street. This These centres will provide retail units and community facilities of a scale appropriate to serve its their catchment area. Development of the Northern Fringe in accordance with Policy CS10 will require the provision of a new District Centre and two new local centres.</u></b></p>	
Policy DM22: Town Centre Uses Outside the Central Shopping Area	There is no change to Policy DM22: Town Centre Uses Outside the Central Shopping Area	<b>No further SA assessment required.</b>
Policy DM23: Retail Proposals Outside Defined Centres	<p>Changes to DM23: Retail Proposals Outside Defined Centres</p> <p><b><u>Major retail Retail proposals for more than 200 sq. m gross net floorspace in locations outside defined centres will only be permitted if the proposal can be demonstrated to be acceptable under the terms of the National Planning Policy Framework (NPPF) Planning Policy Statement 4 (PPS4), particularly in terms of:</u></b></p> <p>a. the appropriate scale of development;</p> <p>b. the sequential approach;</p> <p>c. avoiding significant adverse impact on existing defined Centres; and</p> <p>d. accessibility by a choice of means of transport.</p>	<p>The changes to Policy DM23 would not change the previous SA assessment as the changes simply update the policy.</p> <p><b>No further SA assessment required.</b></p>

Policy DM24: Affordable Housing	There are no changes to Policy DM24: Affordable Housing	<b>No further SA assessment required.</b>
Policy DM25: Protection of Employment Land	<p>Changes to Policy DM25: Protection of Employment Land</p> <p><b>Sites and premises used and/or allocated for employment uses in Use Classes B1 Business, B2 General Industry or B8 Storage and Distribution, as defined by the Use Classes Order 1987 (as amended) and defined Employment Areas will be safeguarded for employment uses that purpose. Permission for the conversion, change of use or redevelopment of such sites or premises to non- Class B1, B2 and B8 purposes, will only be permitted where:</b></p> <ul style="list-style-type: none"> <li>a. <b>the proposed use is compatible with the surrounding uses; and</b></li> <li>b. <b>it can be demonstrated to the Council's satisfaction that the alternative uses are employment-generating uses appropriate to the location with no reasonable prospect of locating elsewhere within the Borough; or</b></li> <li>c. <b>it can be demonstrated to the Council's satisfaction that the proposed use is ancillary to and supports existing employment uses; <u>or</u></b></li> <li>d. <b><u>the site has been allocated for an alternative use in the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.</u></b></li> </ul> <p><b><u>Outside the defined Employment Areas, change of use from B1, B2 or B8 to other uses may be considered where there is no reasonable prospect of the site being re-used for employment purposes over the plan period.</u></b></p>	<p>The changes to Policy DM25 would not change the previous SA assessment as the changes simply update the policy and strengthens the policy through provisions relating to change of use.</p> <p><b>No further SA assessment required.</b></p>
Policy DM26: Protection of Amenity	<p>Changes to Policy DM26: Protection of Amenity</p> <p><b>Development which could lead to significant adverse effects on the amenity or environment of neighbouring uses will not be permitted.</b></p> <p><b>Development which could itself be significantly adversely affected by the conduct of</b></p>	<p>The changes to Policy DM26 would not change the previous SA assessment as the changes simply update the policy and provide for technical reports relating to potential impacts of</p>

	<p><b>established or potentially noisy or polluting uses nearby will not be permitted. <del>Planning Policy Guidance Note 24 (PPG24) and BS4142 surveys will be required in relation to noise.</del></b></p> <p><b>Exceptions will only be made where satisfactory mitigation measures can be secured through the use of planning conditions or Section 106 <del>planning</del> Agreements.</b></p> <p><b><u>Where appropriate, BS4142 surveys or other technical reports covering noise, pollution, land contamination, light, or vibration are required to be submitted with planning applications; they will be proportionate in content to the development type and in accordance with Council's guidance.</u></b></p>	<p>developments.</p> <p><b>No further SA assessment required.</b></p>
<p>Policy DM27: Non-residential uses in residential areas</p>	<p>There are no changes to Policy DM27: Non-residential uses in residential areas</p>	<p><b>No further SA assessment required.</b></p>
<p>Policy DM28: Protection of Open Spaces, Sport and Recreation Facilities</p>	<p>Changes to Policy DM28: Protection of Open Spaces, Sport and Recreation Facilities</p> <p><b>Development involving the loss of open space, sports or recreation facilities will only be permitted if:</b></p> <ul style="list-style-type: none"> <li>a. <b>the site or facility is surplus in terms of all the functions an open space can perform, and is of low value and poor quality, as shown by the Ipswich Open Space, Sport and Recreation Facilities Study 2009 <u>and subsequent update as a result of the Council's Open Space and Biodiversity policy</u>; or</b></li> <li>b. <b>alternative and improved provision would be made in a location well related to the users of the existing facility; <u>or</u></b></li> <li>c. <b><u>the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.</u></b></li> </ul>	<p>The changes to Policy DM28 would not change the previous SA assessment as the changes simply update and clarify the policy.</p> <p><b>No further SA assessment required.</b></p>

<p>Policy DM29: Provision of New Open Spaces, Sport and Recreation Facilities</p>	<p>Changes to Policy DM29: Provision of New Open Spaces, Sport and Recreation Facilities</p> <p><b>All residential developments, and non-residential developments of 1,000 sq. m floorspace or more, will be required to provide and/or contribute to public open spaces and sport and recreation facilities, to meet the needs of their occupiers.</b></p> <p><del>In all major developments (10 dwellings or 1,000 sq. m non-residential development or more), at least 10% of the site area, or 15% in high density developments, should consist of incidental green space (useable by the public in relation to residential schemes).</del></p> <p>Further provision or contribution will be sought according to the size of the proposed development and the quantity and quality of existing open spaces and sports and recreation facilities within the catchment area of the site, as identified by the Ipswich Open Space, Sport and Recreation Study 2009 and subsequent <u>update as a result of the Council's Open Space and Biodiversity policy monitoring</u>. Provision will be made in accordance with the standards set out in Appendix 6, <u>which include provision for children's play areas and for young people.</u></p> <p><u>In all major developments (10 dwellings or 1,000 sq. m non-residential development or more), at least 10% of the site area, or 15% in high density developments, should consist of on-site green space (useable by the public in relation to residential schemes), which will contribute to meeting the overall requirement.</u></p> <p>One-for-one replacement dwellings will be exempt from the requirements of the policy, because they are likely to have a minimal impact on demand for facilities. In addition, only certain types of public open space will be required for elderly persons' accommodation and nursing homes.</p> <p>The requirement will apply to all schemes, unless it can be demonstrated that this would lead to the scheme being unviable and/or site-specific matters so justify. In such cases, a reduced level of provision will be negotiated with the applicant.</p>	<p>The changes to Policy DM29 would not change the previous SA assessment as the changes simply update and clarifies requirements for major developments.</p> <p>No further SA assessment required.</p>
<p>Policy DM30: The Density of</p>	<p>There are no changes to Policy DM30: The Density of Residential Development</p>	<p>No further SA assessment</p>

Residential Development		<b>required.</b>
Policy DM31: Conserving Local Natural and Geological Interest	<p>Changes to Policy DM31: Conserving Local Natural and Geological Interest</p> <p><b>The Council will seek to conserve the nature conservation and geodiversity interest of County Wildlife Sites, Local Wildlife Sites and RIGS identified on the <u>policies Proposals Map, veteran trees, and Suffolk Biodiversity Action Plan species and habitats, by controlling the type and intensity of development. The Council will not grant planning permission for development which would be likely to cause net loss after mitigation and compensation of the relevant biodiversity or geodiversity interest, or protected BAP species, in terms of population size or loss of extent of BAP habitat or feature for which the site was designated.</u></b></p>	<p>The changes to Policy DM31 would not change the previous SA assessment as the changes update the policy and includes a provision for veteran trees.</p> <p><b>No further SA assessment required.</b></p>

Appendix D

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## Scoping Report Comments

	First name	Last name	Company / Organisation	Part of Scoping Report	Comments	Response
1	Katie	Norton	NHS England - East Anglia Local Area Team	General comment	While there are no specific comments at this time, indeed the document looks extremely comprehensive, it is clearly essential that the health implications of any future plans and developments are considered fully. The Health and Wellbeing board will have a key role in the on-going work and we would anticipate being able to offer our support and input through this forum.	Health implications are fully considered through the assessment of policies and site allocations against the SA objective <i>HW1 To improve the health of those most in need.</i>
2	Sue	Bull	Anglian Water	3.3.13 Themes and issues	Agree with main themes and issues identified (3.3.13) in particular: 1) the need to promote and protect the water environment including issues such as quality and resource use 2) the need to adapt to the threat posed by climate change	N/A
			Anglian Water	3.4.2 Issues and Opportunities	We believe the key sustainability issues relevant to Anglian Water have been identified in table 3-2 under the water and climatic factors topics.	N/A
			Anglian Water	5.5.2 Issues and Opportunities	We believe the key sustainability issues relevant to Anglian Water have been identified in table 5-2 under the water and climatic factors topics.	N/A
3	Janet	Nuttall	Natural England	General comment	Natural England promotes the use of our guidance document 'Environmental Quality in Spatial Planning', produced jointly with the Environment Agency and English Heritage, and would recommend that reference is made to this document during the preparation of the new local plan. In particular, Supplementary File 14 provides a checklist to be used during the development of local development frameworks. The guidance can be found at the following link: <a href="http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/default.aspx">http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/default.aspx</a>	The topics listed in Supplementary File 14 overlap with most SA objectives included in the Core Strategy Interim SA report.  IBC will check the guidance and the Supplementary File 14.
			Natural England	General comment	We welcome the efforts made by Ipswich Borough Council in preparing the draft Scoping Report. We are satisfied at present that the Sustainability Appraisal of the Local Plan is proceeding in a proper, logical and comprehensive manner.	N/A

			Natural England	General comment - Approach to SA	We are pleased to see recognition of the Government's objectives for sustainable development. We would advise that reference is made to the requirement for a Habitats Regulations Assessment, required under the Conservation (Habitats and Species) Regulations 2010 to assess the effects of plans, programmes and projects on Ramsar sites.	Reference included in Chapter 1.
			Natural England	Scoping Process	We welcome reference to issues of importance to NE including landscape character, the protection and enhancement of biodiversity and geodiversity, green infrastructure, soils and climate change mitigation and adaption. We would recommend that the SA adopts a suitable topic based approach to assessment of the effects of Plan policies on the environment.	The topic based approach has been adopted through a selection of topic based SA objectives.
			Natural England	Scoping Process	In addition to statutory designated wildlife sites, the effects of the Plan on locally designated sites such as County Wildlife Sites, should be fully assessed through the SA process.	Locally designated sites such as County Wildlife Sites have been taken into consideration and effects on these sites have been assessed. In addition, in order to facilitate the assessment the location of the locally designated sites is shown in GIS maps supporting the assessment.
			Natural England	Scoping Process	The assessment should consider the inter-relationships between topics, for example a number of topics can have a significant influence on biodiversity such as air quality, noise, water quality and resources.	The inter-relationship between topics is considered throughout the assessment.
			Natural England	Scoping Process	The report should reference and consider the objectives of the local Green Infrastructure Plan and the decision making criteria relating to the multi-functionality of the GI network. Objectives and targets of the GI Plan should be used to inform the assessment of impacts on the GI network.	Reference to the standards listed in the Haven Gateway Green Infrastructure Study is made and the objectives have been taken into consideration.

			Natural England	Scoping Process	Recommend consideration of NE's standards for accessible natural greenspace (ANGSt); these provide a set of benchmarks which should be used to ensure new and existing residential development has access to nature. A further useful evidence document in relation to green infrastructure is NEs Analysis of Accessible Natural Greenspace Provision for Suffolk. This identifies levels of deprivation, in terms of access to open space, across the ANGSt standards within each LPA area.	Taken into consideration during the assessment process.
			Natural England	Scoping Process	Regarding potential water resource / quality impacts, reference should be made to the local Water Cycle Study. The findings and recommendations of this should be fully considered as part of the assessment process. Consideration should be given to the deliverability of drainage infrastructure requirements ahead of, or at least in line with, development to ensure environmental impacts are minimised.	The findings and recommendations included in Haven Gateway Water Cycle Study Stage 2 – Ipswich have been taken into consideration with regards to drainage issues, flood risk and surface water and ground water quality. Deliverability is covered in the Implementation Chapter 10 of the Core Strategy.
			Natural England	Scoping Process	Welcome reference to SuDS and advise that the report includes recognition of the multi-functional benefits enhancing landscape, amenity, biodiversity, in addition to drainage and flood management.	The multifunctional benefits of SuDS are included as part of the assessment.
4	Lizzie	Griffiths	Environment Agency	Part 1 Draft Core Strategy Focused Review	We are generally supportive of the topics included in the tables. However, we consider some of these topics could be expanded to incorporate our comments below.	N/A

			Environment Agency	Table 3-2 Issues and Opportunities SA Topic Water	Much of Ipswich, an urban built-up environment and yet water quality has not been identified as a key sustainability issue. Most of the central and western area of Ipswich is designated as Source Protection Zone (SPZ) 2, with two smaller areas designated as SPZ1. SPZs are used to identify those areas close to drinking water sources, where the risk associated with groundwater contamination is greatest, and are important for identifying highly sensitive groundwater areas. SPZs are also recognised within the Environmental Permitting Regulations as a zone where certain activities cannot take place and should therefore be included in the list of key sustainability issues. New development should be encouraged to use Sustainable Drainage Systems (SuDS). These provide the opportunity not only to manage runoff and further reduce flood risk on development sites, as mentioned in the SA report, but also to help protect groundwater and surface water quality.	Water quality is picked up in the assessment framework through sustainability objective ET7. Recommendations to use SuDS are included in the sustainability appraisal. The SA report will include the wide variety of benefits of SuDS such as protection of groundwater and surface water quality.
			Environment Agency	Table 3-2 Issues and Opportunities SA Topic Climatic factors	In this section, it is acknowledged that the risk of flooding may increase as a result of rising sea levels. While the Ipswich Flood Defence Management Strategy will help to reduce flood risk to some areas of Ipswich, it should not be solely relied upon as mitigation. Development should be directed to areas of low flood risk wherever possible, through the Sequential Test process, and highly vulnerable development should not be permitted in the high risk Flood Zone 3.	Considered in the assessment of policies. Where appropriate, recommendations for additional mitigation measures are suggested.
			Environment Agency	Table 3-2 Issues and Opportunities SA Topic Biodiversity	The Scoping Report recognises that opportunities should be sought to develop and enhance the network of public open space. However, it fails to recognise the benefits that can be brought about by seeking opportunities to provide multifunctional open spaces that can help to reduce flood risk, to promote biodiversity and provide recreational areas. These areas can also be a draw for businesses who want to be able to provide an attractive environment to their workers and customers. The provision of both green and blue infrastructure is also important in helping wildlife adapt to the impacts of climate change.	Taken into consideration in the assessment of the revised policies.

			Environment Agency	Table 3-3 SA Objective ET7	Despite not being identified as key issue, we are pleased to note that Water Quality has been included in the SA Objectives. Indicator ET7a is 'water quality in rivers and groundwater quality'. This can be assessed though consideration of whether or not waterbodies are achieving 'good ecological status' or 'good ecological potential' under the Water Framework Directive.	N/A
			Environment Agency	Part 2 Draft Site Allocations DPD Table 5-1 Topic Water	<p>The SA Scoping Report recognises that flood risk should be taken into consideration when allocating sites for development. This should include directing development towards low risk areas through the Sequential Test process, which should be informed by the Ipswich Borough Strategic Flood Risk Assessment. This is particularly relevant to the IP-One Area, of which a relatively large area is currently at high risk of flooding from the River Orwell.</p> <p><b>Appendix A</b> We welcome the inclusion and reference to the Water Framework Directive. This is an important piece of legislation which sets the requirement that nothing should be done to a water body which could cause its status to deteriorate. Ensuring that waste water treatment facilities and infrastructure is adequate enough to ensure the Water Framework is achieved is an important consideration as part of the Core Strategy.</p> <p>The recently adopted Ipswich Development and Flood Risk SPD should be included in the list of relevant local plans and programmes.</p>	<p>Considered in the assessment of site allocations. Where appropriate, recommendations for additional mitigation measures are suggested.</p> <p>Ipswich Development and Flood Risk SPD is included in the list of relevant local plans and programmes.</p>
			Environment Agency	Table 5-1 Topic Climatic Factors	In the SA Topic 'Climatic Factors', it is acknowledged that the risk of flooding may increase as a result of rising sea levels. While the Ipswich Flood Defence Management Strategy will help to reduce flood risk to some areas of Ipswich, it should not be solely relied upon as mitigation. Development should be directed to areas of low flood risk wherever possible, through the Sequential Test process, and highly vulnerable development should not be permitted in the high risk Flood Zone 3. This is particularly relevant to the IP-One Area, of which a relatively large area is currently at high risk of flooding from the River Orwell	Considered in the assessment of policies. Where appropriate, recommendations for additional mitigation measures are suggested.

			Environment Agency	Appendix A	We welcome the inclusion and reference to the Water Framework Directive. This is an important piece of legislation which sets the requirement that nothing should be done to a water body which could cause its status to deteriorate. Ensuring that waste water treatment facilities and infrastructure is adequate enough to ensure the Water Framework is achieved is an important consideration as part of the Core Strategy	N/A
			Environment Agency	Appendix A	The recently adopted Ipswich Development and Flood Risk SPD should be included in the list of relevant local plans and programmes	Included.
5	James	Meyer	Suffolk Wildlife Trust	General comment	It is essential the SA should be an iterative process. It should be ensured that the document recording the appraisal is kept under review so that subsequent amendments to the development plan documents are properly appraised and the outcomes recorded. This should include appraisal of any amendments which arise as a result of other parallel assessment, such as those required through the Habitats Regulations Assessment (HRA) process. The HRA accompanying the adopted Core Strategy and Policies development plan document (The Landscape Partnership, 2009) identified a need, linked to new residential development, for the provision of a significant area of publically accessible open space in order to mitigate potential significant impacts on sites of European nature conservation importance. We consider that it is important that such impacts are also addressed, where appropriate, through the SA and Strategic Environmental Assessment (SEA) processes. Appropriate criteria should be included in the SA in order to appraise this.	Impacts are assessed through the SA process at the next stage. (SA objective ET8 <i>To conserve and enhance biodiversity and geodiversity , including favourable conditions on SSSIs, SPAs and SACs</i> ).
			Suffolk Wildlife Trust	Part One Core Strategy Focused Review 3.3.13 Results from the Review	We support the identification of the objectives to 'conserve and enhance biodiversity as an integral part of economic, social environmental development' and the 'need to protect and enhance biodiversity resources particularly sites of international importance'.	N/A

			Suffolk Wildlife Trust	Appendix B	We recommend that ecological information including that on Country Wildlife Sites (CWS); veteran trees and protected Biodiversity Action Plan (BAP) habitats and species, available from Suffolk Biological Records Centre (SBRC) is used in collating a baseline for this appraisal.	Taken into consideration.
			Suffolk Wildlife Trust	Table 3-3 SA Objective ET8	Recommend that SBRC are included as a source of information under Objective ET8 in Table 3-3.	Included.
			Suffolk Wildlife Trust	5.5.1.2 Baseline Data	In para 5.5.1.2 we suggest that the same objectives are used as those identified in para 3.3.13. Specifically, 'conserve and enhance biodiversity as an integral part of economic, social and environmental development' and the 'need to protect and enhance biodiversity resources particularly sites of international importance'.	The same objectives are used for the assessment of both DPDs.
			Suffolk Wildlife Trust	Table 5-2 Issues and Opportunities	Suggest that the following wording is used in the "Key sustainability Opportunities" for "Biodiversity, Flora and Fauna". We consider that this better reflects the opportunities presented. <i>Development proposals should protect existing habitats and species and should maximise opportunities to enhance habitats or create new habitats in order to deliver the biodiversity objectives of the relevant BAPS. When allocating sites for development the current ecological value of the land should be taken into consideration, alongside the most appropriate use of the land and the proximity of the development to designated sites.</i>	N/A
			Suffolk Wildlife Trust	Appendix A	In 2012 the UK BAP (1994) was succeeded by the UK Post 2010 Biodiversity Framework (July 2012). The list of national plans and programmes in Appendix A should include reference to this document.	Included.
			Suffolk Wildlife Trust	Appendix B Section B-9	Appendix B Section B.9 should include reference to SBRC as a source of data for the first bullet point. This section should also be updated to make reference to the UK Post-2010 Bio Framework (July 2012) succeeding the UK BAP (1994).	Included.

			Suffolk Wildlife Trust	Map 1	Map 1 (Sites of Eco Importance). Update this map to include County Wildlife Sites. Whilst CWSs are recognised in the Scoping Report for the SA they should also be included on this map in order to show an accurate reflection of sites designated for their ecological importance across the borough.	CWSs are included in the GIS maps used in the assessment.
6	Brian	Samuel	Northern Fringe Protection Group	General comment / Appendix B - evidence based approach	A more robust and evidence-based approach for the SA is required that better takes account of the views of the general public which have been shown to be informed and accurate. The NFPG has always supported an employment-led strategy. However, we argued that IBC's Core Strategy (CS) was not sustainable and therefore unsound as it was based on job targets that had no supporting evidence base and were clearly unrealistic and unachievable. The previous SA failed to recognise these legitimate and material concerns and omitted any form of assessment of the implications of the jobs target being unrealistic. Evidence now shows that the jobs target was indeed unsustainable and that the original SA was incorrect in assessing the CS as sustainable.	The employment targets used in the adopted Core Strategy were based on the East of England Plan and its background data, and the 2005 Haven Gateway Employment Study. Delivery is a separate issue and is to do with economic recession.
			Northern Fringe Protection Group	General Comment - consideration of alternatives	We are disappointed that IBC has ditched the employment-led strategy despite this being widely supported by officials, councillors, politicians, businesses and the general public in favour of a housing-led approach. This has been done without any assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy and the associated impacts on sustainability. Such an approach is fundamentally flawed.	The revised strategy set out in Core Strategy Focused Review combines a focus on development delivery with an approach which is policy compliant to the National Planning Policy Framework.

			Northern Fringe Protection Group	General comment - scope of SA	The SA needs to consider the implications of this key change in IBC's strategy and in particular consider the implications of new homes being constructed in Ipswich Borough that will result in either higher unemployment levels in the Borough or new residents having to travel outside the Borough to sites of employment. Previously one of the main arguments that the NF housing development is sustainable was that residents will walk/cycle or travel by bus to new jobs created in Ipswich town centre, which will no longer be the case in a housing-led strategy. The SA of the NF will also need to be revised to take account of this.	The Council has prepared a topic paper on population and household projections and this considers the alternative strategies available to the Council including whether they are policy compliant and realistic in market and deliverability terms. It does not necessarily follow that a larger local workforce will be competing for a smaller number of jobs. For example, some of the population and household growth will be accounted for by people over the retirement age; some residents can travel to jobs using sustainable modes e.g. at Felixstowe, BT Martlesham or London; and at the 2001 Census there was net travel to work into Ipswich.
			Northern Fringe Protection Group	General Comment - consideration of alternatives	We support Paragraphs 2.20 and 2.21 of the IBC Executive paper REF NO: E/13/60 Northern Fringe - Draft Supplementary Planning Document Ipswich Garden Suburb and Sustainability Appraisal confirming that the Core Strategy Focused Review (CSFR) 'will look at alternatives to the Northern Fringe allocation itself'. The Scoping study must include details of how this will be carried out. This should include a 'mapping' of the proposed sites of major employment and new homes in and around Ipswich and analysis of the potential impact and sustainability of likely travel routes. The process should also include an assessment of whether the proposed numbers of proposed new homes and jobs in the area are feasible and sustainable.	See above re separate paper.

			Northern Fringe Protection Group	General Comment - Part One	Clearly sustainability is not just about building sufficient homes to meet anticipated demand but about wider social and environmental issues. The implications of a larger local workforce competing for a relatively smaller number of jobs, for example on average salary levels which have already fallen substantially in Ipswich, need to be fully considered in the SA of the CSFR. Lower average salary levels will inevitably result in higher levels of deprivation and poverty with associated health implications especially in relation to increased fuel poverty. Unless property prices fall to mirror lower average salaries, homes will become even less affordable.	See above. Also refer to City Deal which is being used to address skills issues in the workforce.
			Northern Fringe Protection Group	General Comment - evidence base	The full sustainability implications of the change in the focus of the CS on the wider transport network must also be fully assessed in the SA of the CSFR and in considering alternatives to the Northern Fringe allocation itself. Clearly this can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring authorities that takes full account of relevant employment sites and proposed new housing developments. This needs to assess the impact on air pollution as traffic from the NF will pass through AQMAs and areas of pollution concern as residents travel to work.	The SA assesses the implication of each policy with regards to travel through <i>ET4 To reduce the effects of traffic upon the environment</i> and air pollution through <i>ET1 To improve air quality</i> .

			Northern Fringe Protection Group	General Comment - Part One / Consideration of alternatives	<p>The SA of the CSFR must assess and compare the sustainability benefits of a realistic jobs-led CS to a housing-led strategy. This needs to include relative assessments of a co-operative approach between Ipswich Borough and neighbouring authorities where new homes are built near to the location of new jobs across. Such an approach is required under the NPPF requirement for local authorities to co-operate. We are concerned that the Ipswich Housing Market Area Strategic Housing has not taken full account of neighbouring authorities and could result in sub-optimal decision-making.</p>	<p>Refer to NPPF requirement to meet objectively assessed housing need. The Ipswich SHMA looked at the whole housing market area (Ipswich, Mid Suffolk, Babergh, and Suffolk Coastal).</p>
			Northern Fringe Protection Group	General Comment - Part One / Consideration of alternatives	<p>In particular, the SA of the CSFR needs to consider whether there are alternative brownfield sites outside of the Borough that can accommodate new housing with better access to new sites of employment, such as the Sroughton Sugar Beet site, which would be a more sustainable option than building on the high grade agricultural land of the NF with residents commuting through Ipswich to access employment sites. The impact of utilising sites such as Grafton Rd, Cox Lane and Westgate for a larger number of new homes, rather than leaving them vacant, needs to be appraised.</p>	<p>Sugar Beet Factory site is outside IBC's control. Babergh Core Strategy identifies it for employment to meet job needs. People living there would still need to travel through Ipswich to job opportunities. Plan has to be realistic - in terms of Coastal and Babergh which have just completed Core Strategy processes and market delivery of housing on brownfield sites.</p>

			Northern Fringe Protection Group	General Comment - Part One	<p>The current CS allows for a phased approach for the development of the NF and the previous Suffolk County Council Northern Fringe Sustainability Appraisal and the Core Strategy independent Inspection judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the entire NF without any locational restrictions. A detailed examination of the implications of this change must be included in the new SA along with a full assessment of the rationale behind the proposed changes. This should include analysis of the comparative risks of unfinished sites and/or stalled developments being left on the NF for whatever reason. This is already a major problem for Ipswich in relation to the waterfront developments, as a result of the unsustainable multi-starts that were allowed to commence and become a major blight on Ipswich.</p>	<p>The SA of revised policy CS10 fully consider the implications of multiple starts compared to the original CS10. The majority of mitigation measures proposed to reduce significant negative effect will involve a number of infrastructure improvements (SuDS, pedestrian and public transport infrastructure such as bus stops, etc.) and multiple starts will allow a more comprehensive construction planning.</p>
			Northern Fringe Protection Group	Table 2-1 Stages in SA Process	<p>Stage A runs from September to October 2013 and includes this consultation process, which has a submission date of 28th November 2013. Clearly Stage A needs to be extended and allow time for the inclusion of comments from the consultation process.</p>	<p>Updated.</p>

			Northern Fringe Protection Group	Table 2-1 Stages in SA Process	Stage B, running to the end November 2013 does not provide sufficient time given the proposed shift to a housing-led strategy. The DPD assessment and evaluation process needs consider the relative merits of a realistic jobs-led strategy compared to a housing-led approach and the cross-boundary implications between Ipswich Borough and neighbouring authorities.	Updated.
			Northern Fringe Protection Group	Table 2-1 Stages in SA Process	Stage D. We object to the proposed consultation of the SA during the summer holiday period given its importance. We are pleased that IBC has listened to our concerns with other proposed major consultations being released over the Xmas holidays by commencing them in early January instead. We would be grateful if similar consideration be given to the scheduling of the SA consultation. The timetable should also allow for the SA to go before the Executive/Council.	IBC aims to avoid holiday periods but it is not always possible.

			Northern Fringe Protection Group	Table 2-1 Stages in SA Process	Given the work required in the new SA and the previous delays/issues with the NF SPD appraisal, we have some concerns with the timescales. Sufficient resources need to be made available to ensure a robust SA is completed in a timely manner.	IBC has appointed consultants to undertake the work and they will provide the necessary resources.
			Northern Fringe Protection Group	3.2.1 Review of Core Strategy	Paragraph 3.2.1 needs to reference the proposal for the Core Strategy to no longer be jobs-led but a housing-led strategy. The SA must compare and assess the relative benefits of these alternative strategic approaches and alternatives to the NF allocation itself as committed to by IBC in the recently approved Executive paper REF NO: E/13/60.	The emphasis now through the NPPF is on delivery so the strategy is more delivery focused. For housing it aims to meet needs, for employment local and regional strategies aim to play to the area's sectoral strengths.

			Northern Fringe Protection Group	3.3.2, 3.3.11, Table 3-1, PPPs	Paragraphs 3.3.2 and 3.3.11 and Table 3-1 need to specifically reference the CSs of neighbouring authorities and the critical work of the Ipswich Policy Area Board given the duty to cooperate and the proposed approach to build homes in Ipswich Borough for people working outside the Borough. These are more important than the New Anglia Local Enterprise Partnership 'Towards a Growth Plan' 2013, which is more of a wish list than an evidence-based document. The quoted growth forecasts are out of date.	Table 3-1 just summarises the NALEP plan. Reference to the neighbouring Core Strategy is included.
			Northern Fringe Protection Group	Table 3-1 PPPs	Table 3-1 should refer to Ipswich Borough-specific data rather than quoting East of England data and should reference the most recent data e.g. the EEFM August 2013 modelling. This projects a lower level of jobs than previously. Population 2011: 133.7k 2031: 163.4k Increase: 29.7k (22.21%) Resident jobs 2011: 63.2k 2031: 71.4k Increase: 8.2k (12.97%) This means that additional residents will either have to commute outside of Ipswich Borough to find work or will be unemployed; neither of which is sustainable.	Aug 2013 modelling results came out too late to inform this draft but will be taken into account in future drafts of the plan.

			Northern Fringe Protection Group	3.3.9 PPPs	The East of England Plan is no longer relevant.	3.3.10 indicates that it has been revoked.
			Northern Fringe Protection Group	3.3.12 PPPs	PPPs needs to be defined here rather than later in the document.	Agreed and will be updated in final SA Report.

			Northern Fringe Protection Group	3.4.1.3 Question B	Ipswich Central's vision for Ipswich needs to be considered <a href="http://ipswichcentral.com/thebigdebate/">http://ipswichcentral.com/thebigdebate/</a> along with the work of the Ipswich Policy Area Board especially in relation to employment and the 2012 Air Quality Updating and Screening Assessment for Ipswich Borough Council (January 2013), which concludes that 'St Matthews Street and Woodbridge Road are both areas where NO2 results were high. These areas have therefore undergone a detailed assessment and as a result AQMA's will be declared.'	The additional AQMAs have not yet been declared - boundaries are being considered.
			Northern Fringe Protection Group	Table 3-2 Issues and Opportunities / Appendix B7	Table 3-2 needs to reference the proposed new AQMAs (as does Appendix B.7) as referenced above and utilise more recent data where available. There are also opportunities to improve cross-town transport infrastructure and access to the A14/A12. This will become a fundamental requirement if the CS is changed to housing-led as residents will need to be able to easily commute to employment sites outside the Borough.	See above

			Northern Fringe Protection Group	4.1 Geographical Scope	As the CSFR proposes to a housing-led strategy with residents commuting to jobs outside of Ipswich Borough, the SA clearly needs to undertake a full and detailed assessment of the associated travel implications outside of Ipswich Borough.	<p>The purpose of the SA is not to undertake detailed transport assessments. That would be considered through transport modelling once 2011 Census Travel To Work data has been published.</p> <p>The SA assesses the implication of each policy with regards to travel through <i>ET4</i> To <i>reduce the effects of traffic upon the environment</i>.</p>
			Northern Fringe Protection Group	4.2.1.1 Aspects of DPD to be assessed	<p>Paragraph 4.2.1.1 needs to make clear that the proposed CSFR is no longer a jobs-led strategy but a housing-led strategy. To fail to mention this fundamental change is misleading and lacks transparency. Likewise the major proposed changes to CS10 need to be outlined here i.e. the intention to allow simultaneous multiple starts across all three areas of the NF without restricting the number of construction sites at any one time etc and prior to the agreement of a Masterplan also needs to be specifically mentioned.</p>	See above.

			Northern Fringe Protection Group	4.2.2 Assessment of Alternatives	As stated above, the SA of the CSFR needs to assess the alternative of an evidenced-based jobs-led strategy. It also needs to assess the alternative of a phased and controlled development of the NF that does not allow multi-site starts or places restrictions on when the three areas of the NF can be developed and/or on the number of sites that can be developed in any one area at the same time.	Done through the assessment process of alternatives.
			Northern Fringe Protection Group	6.2.2 Aspects of DPD to be assessed	Paragraph 6.2.2 the SA of site allocations DPD needs to consider the relative benefits of having new housing built in neighbouring authorities nearby new employment sites compared to housing being built in Ipswich that requires residents to commute to new employment sites outside of Ipswich. It also needs to assess the relative benefits of more housing being built in the town centre for example on the Westgate site as proposed in the Ipswich Central vision for Ipswich and on the Grafton Way site.	The SA cannot assess the effects of developments located outside the boundary of the Borough.
7	Barbara	Robinson	Save our Country Spaces	N/A	SOCS strongly object to the change by IBC within the SPD issued on 15th November by removal of text from 'Establishing Priorities' within its Chapter 2 Vision and Core Objectives for Core Strategy Policy Area CS10 as this is likely to have a significant adverse impact on the steer and sustainability of the Core Strategy Focused Review.	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.

			Save our Country Spaces	General comment	SOCS to date have failed to see a Sustainable Development Strategy which outlines the over-arching Government objective to raise the quality of life in our communities referenced within the Hyder SASR. Assessed need is weak within the document.	Core Strategy sets out the sustainable development strategy. Assessed housing need will be identified in a separate paper. This scoping report sets the framework for the future assessment of the plans.
			Save our Country Spaces	General comment / Core Strategy CS10	As an Environmental Impact Study will not be delivered until the end of the exercise and will be done by the developers, - almost at a point of no return- it is hard to securely ascertain whether the revision of the Core Strategy and changes to CS10 are sustainable.	The purpose of the scoping report is to set the framework for the SA not to undertake the SA.
			Save our Country Spaces	General comment	SOCS feel the NPPF guidance structured around specific sections indicates a predominantly negative ( N) rather than a positive outcome, specifically for: Building a strong, competitive economy; Ensuring the vitality of town centres; Supporting a prosperous rural economy; Promoting sustainable transport; Supporting high quality communications infrastructure; Promoting healthy communities; Protecting Green Belt land; Meeting the challenge of climate change, flooding and coastal change; Conserving and enhancing the natural environment; Plan-making; Decision-taking.	The purpose of the scoping report is to set the framework for the SA not to undertake the SA.
			Save our Country Spaces	N/A	Having appraised the available evidence base and applied a grass roots knowledge of the area and the town, SOCS feel that the deliverability and viability of the NF developments together with potential short, medium and long term adverse social, economic and environmental impacts of proposals present possible unacceptable adverse effects for the entire Ipswich population. SOCS suggest that sustainable development proposed on the NF is, in its present form, highly questionable.	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.

			Save our Country Spaces	General comment	The Hyder SASR is highly selective and imbalanced.	The scoping report is produced in compliance with the relevant legislation and baseline data are gathered from various available sources.
			Save our Country Spaces	Appendix A	Ipswich Housing Market Area Strategic Housing is unsound as it failed to assess this with other LAs required under Duty to Cooperate.	See earlier comment re NFPG - SHMA was joint research and looked at whole housing market area.
			Save our Country Spaces	Appendix A	The Suffolk Growth Strategy March 2013 - referenced with in the Hyder SR appears more hot air and aspiration than substance. The language it uses is unwise and cannot be validated. It applies less to IBC than other LAs.	As a Suffolk strategy for growth it is a key document for Ipswich and is therefore included in the list of plans policies and programmes.
			Save our Country Spaces	Appendix A	New Anglia Local Enterprise Partnership 'Toward A Growth Plan 2013- SOCS suggest the Confidence Factor here is totally misplaced with respect to Ipswich's situation.	The NALEP Growth Plan is a key document for Ipswich and is therefore included in the list of plans policies and programmes.

			Save our Country Spaces	Appendix A	Suffolk Haven Gateway Employment Land Review-Flags up the importance of the A14 and surrounding area, which is a more realistic scenario for employment as suggested by NFPG and SOCS.	This document has been included in the list of plans policies and programmes.
			Save our Country Spaces	Appendix B	Population data has been selectively and subjectively presented and should show the pattern over a range of time scales, bearing in mind the population of Ipswich in 1960 mid way was 126,000 when a similar level of expansion was being planned AND got halted after an initial start; the problematic legacy which still exists within Ipswich today and is recently paralleled within Ipswich Docks.	Population change is shown annually from the 2001 Census and the course is the ONS. A separate topic paper on population will be prepared as part of the evidence base for the plan to fully set out the modelling the Council has used.
			Save our Country Spaces	N/A	Sewage and water issues constraints and resolutions need further confirmation. Community Steering panel were promised an update on this from Anglian Water March 2013.	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.
			Save our Country Spaces	Appendix B	There is added dissatisfaction with reliance on questionable and previously unreliable projections and modelling of future needs which translate into targets. (Projections which agency such as OEM readily admits are an imprecise science and were overly optimistic). These targets themselves appear, on close scrutiny, to be unsustainable. Lack of consistency by the Borough in using consistent modelling methodology adds to the problem	A separate topic paper on population will be prepared as part of the evidence base for the plan to fully set out the modelling the Council has used.

			Save our Country Spaces	General Comment / Appendix B	With regard to Sustainability Appraisals, Strategic Environmental Assessments and Scoping work, there has been criticism of the fitness for purpose of this vital work by the main residents groups. This may be in part due to paucity of available data and available information being provided by IBC at the outset to the independent company. It may have been in part due to unrealistic expectations by IBC as to the necessity and extent of the work which would be required.	This is the first stage in the SA for the Core Strategy Focused Review and Site Allocations DPD. Data have been made available and/or is accessible via the Internet.
			Save our Country Spaces	N/A	The initial failure of IBC to conduct a formal SEA Screening Exercise to evaluate potential social, economic and environmental impacts of their emerging plans for the Northern Fringe at the outset of the masterplanning work was unfortunate. If this had been addressed properly, it would have clearly demonstrated their obligation under the SEA Directive 2001/42/EC. The statement below from Executive paper E/13/60 26th November 2013, 2.2, finally validates resident groups' stance on this obligation with the final recognition and acceptance by IBC's Executive of obligation under the SEA Directive 2001/42/EC2 for the IBC's North Fringe/Ipswich Garden Suburb SPD. '2.2 The development of the Northern Fringe involves major challenges due to its large-scale, multiple ownership, the need to incorporate a wide range of supporting infrastructure and the mitigation of impacts on local communities.'	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.

			Save our Country Spaces	N/A	SOCS feel the following comment from Executive paper E/13/60 26th November 2013 is disingenuous and misplaced. (SOCS emphasis) '2.21 NFPG/SOCS were, at their request, afforded the opportunity to comment on earlier draft versions of the SEA/SA and their views are attached as appendices 3-5. The SEA/SA as well as the draft SPD has been amended in response, e.g. by removing sequencing diagrams which it is agreed were too prescriptive at this stage. However, many comments made by these groups conflate the principle of the development with its environmental effects.' If proper consideration of the environmental and wider concerns and had taken place in a timely fashion, then current difficulties with the scope of the SPD may have been avoided. SOCS always held the view it had been wrong to re classify the North Fringe work from a DPD to an SPD status. Rather than conflating the principle of development, SOCS believe the environmental effects and possible impacts are fundamental to that principle of development on Sustainability grounds. As already stated, an Environmental Impact Study will not be delivered until the end of the exercise and will be done by the developers; - almost at a point of no return- it is hard to securely ascertain whether the revision of the Core Strategy and changes to CS10 are sustainable.	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.
			Save our Country Spaces	General Comment	It appears, following SOCS conversation with Wild Anglia, that IBC have failed to meet their obligations to inform all Statutory stakeholders for the SASR. Does this mean the statutory notice period for consultation may need to be extended?	The Council consulted Wild Anglia on the draft Scoping Report but received no comments from them.

			Save our Country Spaces	Part One Core Strategy	<p>The manner and delivery of last minute, poorly drafted revisions and additions to the Executive paper on the 15th October on CS10 were, in SOC's view totally unacceptable, and in breach of their own policies, (protocols and SCI) . The unacceptably poor practice, was possible outside proper process in the public's view. The subsequent failure by IBC to properly clarify the changes and place them in the public domain in a timely and transparent fashion added to the confusion and was not in the best public interest. SOCS consider this breach of process to be further example of maladministration and may pursue this as a complaint or further, at the appropriate time through examination of the CSFR. Whilst this may appear to digress from the purpose of this response to the SA Scoping Consultation, SOCS feel the above criticism of the process is key and material to it. SOCS is still unclear about the full future implications these last minute changes might have on the soundness and sustainability of the Core Strategy and DPD as there has been insufficient time to appraise this situation and seek our own independent legal opinion. It is SOCS (&amp; NFPG ) worry, that the changes and revision to CS10, are essentially so great and so fundamental a change in direction and steer for the Borough , that there may be seriously undesirable unintended consequences which should be properly referenced, appraised and evaluated within this SA Scoping report. The CS10 revision /changes currently are not even properly referenced nor track changed within the SASR.</p>	<p>This Scoping Report sets the framework for the appraisal of policies including revised CS10. The policy appraisal itself follows on from this scoping stage.</p>
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			Save our Country Spaces	Part One Core Strategy	<p>It is SOCS (&amp; NFPG) worry, that the changes and revision to CS10, are essentially so great and so fundamental a change in direction and steer for the Borough, that there may be seriously undesirable unintended consequences which should be properly referenced, appraised and evaluated within this SA Scoping report. The CS10 revision /changes currently are not even properly referenced nor track changed within the SASR. Equally, there is no reference or evaluation as to whether an SPD status document was/is a suitable vehicle to take these proposals forward to a proper sustainable conclusion. This therefore does not follow best practice guidance issued by the Chief Planner and DCLG in 2012. The verbal claim by IBC officers that changes and revision to policy CS10 within the CSFR were deemed necessary to prevent the risk of unfettered development via early planning applications before the due processes were completed is as yet, an untested and unevaluated opinion. It should be a proposal that is referenced and explored within this scoping document. If planning consents by legal challenge was deemed to be a risk, references should be made to the guidance 2012 from DCLG 6 and an evaluation of the relative risks incorporated within the SA SR.</p>	<p>It is not the role of the Scoping Report to list the policies. The Scoping Report sets the framework for the appraisal of policies.</p>
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				N/A	<p>SOCS have always pragmatically supported a jobs-led / employment - led Local Plan and Core Strategy. This is deemed as a proportionate, balanced and sensible approach which would engender much public support. However, the public cannot and will not support a skewed and unsustainable homes led policy approach which they consider to be unsound. The public look to Spain, Ireland and Portugal who have learnt this fundamental fact to their cost. The public feel attempting to build your way out of recession is not going to work, especially in Ipswich. Yes, IBC have repeatedly consulted the public but have repeatedly failed to listen and respond to the public's majority common sense view. As Russell Williams CEO stated at the IBC Examination in public 2011, the danger is of the tail wagging the dog; with Central Government and business landowner /developer pressure taking precedence over the publics' expressed views and wishes for the town. SOCS key concern is that if this development were to be allowed to proceed in it's current form, the long term success of the proposals are questionable, and likely to be unsustainable on viability and deliverability grounds -due to insufficient profits being generated to reliably deliver the necessary infrastructure and mitigation, together with sufficient resources being reliably available for medium and long term maintenance obligations generated by the sites needs. The Environment Agency already is looking to local resolution and mitigation by neighbourhood voluntary groups to address the likely shortfall of resources. The new prospective home owners may balk at the imposition of a long term maintenance levy applied in perpetuity for services which are to be accessed and enjoyed by the whole of the Ipswich population and the IPA.</p>	<p>Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.</p>
			Save our Country Spaces	General comment - omission	<p>No mention is made in this Scoping report, nor in earlier iterations by Hyder of the long standing requirement to mitigate for the pressures inter authority on the RAMSAR sites, Deben and Orwell as per their joint SA/SEA commitment agreed with Suffolk Coastal District Council and further strengthened by legal challenge by Suffolk Wildlife Trusts evaluation on impacts.</p>	<p>An Appropriate Assessment is being carried out and it will be referenced in the final Sustainability Report.</p>

			Save our Country Spaces	General comment - alternatives	Where is the Plan B or alternatives referenced? Where is there evidence of wiggle room; where is an evaluation of what will happen if one or more landowners/developers face either logistical difficulties (unforeseen or in the natural course of events) or financial difficulties, or both?	This comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report, however the consideration of reasonable alternatives for the Core Strategy Focused Review and Site Allocations DPD will take place at the next stage in the SA process.
			Save our Country Spaces	N/A	What are the contingency measures proposed if, having started development, (especially with the prospect of multiple starts), a default situation arises or Central government yet again moves the goal posts on anticipated Section 106 or CIL infrastructure funding. This may allow the impact of viability considerations to override local identified needs? This may lead to non delivery of vital infrastructure and render the development unsustainable.	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.
			Save our Country Spaces	N/A	Where is the independent market surveillance and anecdotal, but valuable evidence to halt matters if unsustainable development ensues and the need arises? What efficacy does the IBC AMR have to directly influence the phasing and rate of development and halt it if necessary? Should not this be given equal weight and material consideration within the Courts if there is a developer landowner challenge?	Comment relates to the Northern Fringe / Ipswich Garden Suburb SPD and not to this Scoping report.
			Save our Country Spaces	General Comment	Where is the empirical evidence that IBC is paying due attention and heeding National Plans and Programmes cited in the Hyder Scoping Report (such as one of the most important documents reviewed) namely the Sustainable Development Strategy which outlines the overarching Government objective to raise the quality of life in our communities?	One of the tests of soundness is that a plan is justified, which means it should be based on proportionate evidence.

			Save our Country Spaces	Appendix B	Raising the quality of life in our communities is vital considering the identified problems highlighted within IBC AMR and in the current difficult climate of economic problems facing Ipswich, many of which are effectively beyond their capacity to control; re Traffic /congestion/ pollution, educational underachievement, ( all SCC ) unemployment rates economic inactivity- (Local Business & market forces) - inaccurately portrayed within the Hyder document as below national averages but are they not higher in Ipswich? - urban cramming and resultant deprivation, and difficulties experienced with lack of social housing and inadequate health and social care service delivery (SCC CCGs and Central Government). Effectively the Borough only has control over urban cramming (and resultant deprivation), and difficulties experienced with lack of social housing - both areas which they also appear to have limited control over due to developer and landowner pressure under the steer of the current Central Government Build at All cost/ Build at Any Cost Agenda! The revision CS10 and Focused Review of the Core Strategy reflects that central dilemma. SOCS recognise this is a difficult place to be.	Quality of life is picked up in sustainability objective HW2.
			Save our Country Spaces	General comment - omission	Environmental constraints such as the recent 50% cut in direct government funding to the Environment Agency for flood re-mediation and maintenance will have a significant impact on sustainability and need to be explored within the SA/SEA.	Flooding issues are picked up in sustainability objective ET7. The Ipswich flood defences are due for completion in 2018.

			Save our Country Spaces	General Comment - omission	Equally important bearing in mind Ipswich's BC obligations on formal AQMA problems is the referencing of the recent DEFRA consultation which ended September 2013 and IBC's responses to it in the light of their identified and ever growing air quality problems which will be further impacted by the NF proposals. This should be covered within this report. There is a need therefore to reinvigorate and refocus LAQM on action to help the UK meet EU air quality standards and to clarify its role alongside other actions to improve air quality (by national government etc) and to highlight what local authorities can do through working together to improve air quality. Failure to incorporate, reference and evaluate this important information, which has been identified as one of the key environmental issues and constraints on the NF proposals, weakens and devalues the purpose of this Scoping report. SOCS would suggest if IBC's specialist Public Health and Air Quality Management / Climate Change Officers have not been formally invited to contribute to this Scoping exercise, this is tantamount to negligence.	Air quality is picked up in sustainability objective ET1.
			Save our Country Spaces	General Comment	<b>SOCS sign up to the NFPG Comments also (see above). Those where SOCS add further comments are listed below with SOCS' additions shown in italics.</b>	N/A
			Save our Country Spaces	General Comment	We are disappointed that IBC has ditched the employment-led strategy despite this being widely supported by officials, councillors, politicians, businesses and the general public in favour of a housing-led approach. This has been done without any assessment or evidence of the relative merits of such an approach compared to a realistic jobs-led strategy and the associated impacts on sustainability. Such an approach is fundamentally flawed. <i>It may also be unnecessary as just as IBC jobs target deficit was addressed at inspection by alternative arrangements to met the jobs quota from the Ipswich Policy Area IPA so likewise can the housing targets under Duty to Cooperate and Localism.</i>	The revised strategy set out in Core Strategy Focused Review combines a focus on development delivery with an approach which is policy compliant to the National Planning Policy Framework.

			Save our Country Spaces	General Comment	<p>Clearly sustainability is not just about building sufficient homes to meet anticipated demand but about wider social and environmental issues. The implications of a larger local workforce competing for a relatively smaller number of jobs, for example on average salary levels which have already fallen substantially in Ipswich, need to be fully considered in the new SA. Lower average salary levels will inevitably result in higher levels of deprivation and poverty with associated health implications especially in relation to increased fuel poverty.</p> <p><i>This is particularly relevant to IBC as it is essentially a relatively low waged economy, compared to other local LAs, with comparatively young demographic.</i></p>	<p>The Council has prepared a topic paper on population and household projections and this considers the alternative strategies available to the Council including whether they are policy compliant and realistic in market and deliverability terms. It does not necessarily follow that a larger local workforce will be competing for a smaller number of jobs. For example, some of the population and household growth will be accounted for by people over the retirement age; some residents can travel to jobs using sustainable modes e.g. at Felixstowe, BT Martlesham or London; and at the 2001 census there was net travel to work into Ipswich.</p>
			Save our Country Spaces	General Comment	<p>The full sustainability implications of the change in the focus of the CS on the wider transport network must also be fully assessed in the new SA. This can only be completed through detailed traffic assessment and modelling on an integrated basis across Ipswich Borough and in neighbouring authorities that takes full account of relevant employment sites and proposed new housing developments. This needs to assess the impact on air pollution as traffic from the NF will pass through AQMAs and areas of pollution concern as residents travel to work.</p> <p><i>Fit for the 21century solutions are already causing problems at Civic Drive, where removal of a perfectly serviceable roundabout appears to be further exacerbating congestion and pollution. A review of SCC transport solutions for Tuddenham Road and Westerfield will be required to address these unsustainable transport solutions.</i></p>	<p>See above.</p>

			Save our Country Spaces	General Comment	<p>The new SA must assess and compare the sustainability benefits of a realistic jobs-led CS to a housing-led strategy. This needs to include relative assessments of a co-operative approach between Ipswich Borough and neighbouring authorities where new homes are built near to the location of new jobs across. Such an approach is required under the NPPF requirement for local authorities to cooperate.</p> <p><i>The Actions under Duty to Cooperate issued by DCLG in 2012 requires a statement of actions by IBC. The regulations also require you to report to your communities on the actions you have undertaken under the Duty to Cooperate. In addition to the transparency benefits this brings, it will be beneficial when it comes to showing compliance with the Duty to Cooperate at examination on any forthcoming Local Plans, either yours or ones you have an interest in.</i></p>	Refer to NPPF requirement to meet objectively assessed housing need. The Ipswich SHMA looked at the whole housing market area (Ipswich, Mid Suffolk, Babergh, Suffolk Coastal).
			Save our Country Spaces	General Comment	<p>In particular, the SA needs to consider whether there are alternative brownfield sites outside of the Borough that can accommodate new housing with better access to new sites of employment, such as the Sproughton Sugar Beet site, which would be a more sustainable option than building on the high grade agricultural land of the NF with residents commuting through Ipswich to access employment sites.</p> <p><i>SOCS are pleased there is recognition within the Executive report 26th November that acknowledges this requirement and states suitable alternatives will be explored at SA of the CSFR.</i></p>	Sugar Beet Factory site is outside IBC's control. Babergh Core Strategy identifies it for employment to meet job needs. People living there would still need to travel through Ipswich to job opportunities. Plan has to be realistic - in terms of Coastal and Babergh which have just completed Core Strategy processes and market delivery of housing on brownfield sites.

			Save our Country Spaces	General Comment	<p>The current CS allows for a phased approach for the development of the NF and the previous Suffolk County Council Northern Fringe Sustainability Appraisal and the Core Strategy independent Inspection judged multiple starts as unsustainable. However, the revised CS now allows simultaneous multi-site development across the entire NF without any locational restrictions. A detailed examination of the implications of this change must be included in the new SA along with a full critique of the rationale behind the proposed changes.</p> <p><i>The suggested possibility of a multi start approach, whilst appearing to easy delivery of infrastructure may also pose the risk if one or more developer / landowner hits financial or other problems. As stated earlier in SOCS response, what contingency is there within the proposals if to market forces or other difficulties impact on infrastructure delivery ,the added burden which may fall on remaining landowners /developers , thereby making their operation unviable and halting their delivery? The land having been committed, will be blighted for years will little sound chance of resolution as happened locally at the Ipswich Dock/Waterfront and in Ireland. This is a fundamentally unsustainable situation. A safety net fund needs to be arranged and established as mitigation, -reserve matters? - or perhaps Grampian Conditions with front loaded finance ahead of any planning permission being granted and started. Grampian Conditions are not referenced or mentioned within the Hyder Scoping report.</i></p>	See above.
			Save our Country Spaces	3.4.1.3	<p>Paragraph 3.4.1.3 Ipswich Central's vision for Ipswich needs to be considered <a href="http://ipswichcentral.com/thebigdebate/">http://ipswichcentral.com/thebigdebate/</a> along with the work of the Ipswich Policy Area Board especially in relation to employment and the 2012 Air Quality Updating and Screening Assessment for Ipswich Borough Council (January 2013), which concludes that 'St Matthews Street and Woodbridge Road are both areas where NO2 results were high. These areas have therefore undergone a detailed assessment and as a result AQMA's will be declared.'</p> <p><i>Or substantive changes, additional AQMA or enlargement made to existing AQMA which are being impacted by NF proposals.</i></p>	The additional AQMAs have not yet been declared - boundaries are being considered.

			Save our Country Spaces	4.1	As the revised CS proposes to a housing-led strategy with residents commuting to jobs outside of Ipswich Borough, the SA clearly needs to undertake a full and detailed assessment of the associated travel implications outside of Ipswich Borough. <i>Any update on out of date SCC Survey data?</i>	This is not a job for the SA and would be considered through transport modelling once 2011 Census Travel To Work data has been published.
8	Katharine	Fletcher	English Heritage	General comment / Appendix B Baseline Data / Table 3-3 ET9	The draft report is lacking in detail at this stage in relation to the historic environment. We would request that further consideration is given to how can be strengthened.	The detailed assessment will be undertaken at the next stage.

				<p>General comment</p>	<p>With regard to the scope of the policies to be appraised, we note that this is a focused review, particularly relating to the delivery of housing and employment. Notwithstanding this, we would recommend that the implications of the National Planning Policy Framework (NPPF) in relation to other, generic, policies should be considered. The NPPF identifies the historic environment as a key dimension of sustainable development in para 7, and it is included within the core planning principles in para 17. We would wish the local plan allocations, and general policies, to take account of the contribution that the historic environment makes to sustainable development at both a strategic and detailed level.</p>	<p>The Scoping Report picks up historic environment matters under sustainability objective ET9 and in the baseline data at Appendix B B10. The Core Strategy Focused Review also proposes minor amendments to policies including those on historic environment to reflect the NPPF. A detailed consideration of the impact of the NPPF on the adopted Core Strategy was considered by the Council's Executive Committee on 14th August 2012</p> <p><a href="https://democracy.ipswich.gov.uk/Data/Executive/20120814/Agenda/E-12-30_-_Impact_of_the_National_Planning_Policy_Framework_on_the_Adopted_Ipswich_Core_Strategy_-_Appendix.pdf">https://democracy.ipswich.gov.uk/Data/Executive/20120814/Agenda/E-12-30_-_Impact_of_the_National_Planning_Policy_Framework_on_the_Adopted_Ipswich_Core_Strategy_-_Appendix.pdf</a></p> <p><a href="https://democracy.ipswich.gov.uk/Data/Executive/20120814/Agenda/E-12-30_-_Impact_of_the_National_Planning_Policy_Framework_on_the_Adopted_Ipswich_Core_Strategy.pdf">https://democracy.ipswich.gov.uk/Data/Executive/20120814/Agenda/E-12-30_-_Impact_of_the_National_Planning_Policy_Framework_on_the_Adopted_Ipswich_Core_Strategy.pdf</a></p>
				<p>General comment / Appendix B Baseline Data</p>	<p>A further requirement of the NPPF is that local plans should set out a positive strategy for the historic environment (para 126). In relation to this, it will be essential to ensure that there is a solid foundation in the SA/SEA relating to the evidence base for the historic environment, and the issues and trends that are evident in the local plan area that can potentially be influenced by the plan. To enable the SA/SEA to play its full part, it may be helpful to prepare a brief topic paper for the historic environment, bringing together the baseline data and the relevant issues. English Heritage has published guidance in relation to SA/SEA and the historic environment, which is available on the Historic Environment Local Management (HELM) website. This refers to a range of data sets that can be publically accessed. The document also includes recommendations relating to potential indicators.</p>	<p>The assessment takes into consideration the protection and conservation of the historic environment by assessing the potential effects of the plan with regards to following objectives: ET9 <i>To conserve and enhance the historic environment, heritage assets and their settings</i> and ET10 <i>To conserve and enhance the quality and local distinctiveness of landscapes and townscapes.</i></p> <p>The revised policies are not directly related to conservation of the historic environment, other policies previously assessed address this topic.</p>

				Table 3-3 ET9	We note in the report that you refer to heritage assets at risk, and this an issue underlined in para 126 of the NPPF. In order to ensure that the SA/SEA report is up to date, we recommend that you refer to the latest information in English Heritage's 2013 register, which is available on our website: <a href="http://www.english-heritage.org.uk/publications/har-2013-registers/">http://www.english-heritage.org.uk/publications/har-2013-registers/</a>	The latest register will be used during the assessment of potential effects. (Heritage at risk register 2013, East of England).
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Appendix E

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## Sustainability appraisal of alternatives

The tables below provide an explanation of the notation used in the options assessment matrix.

Major Positive Impact	The policy strongly supports the achievement of the SA Objective.	<b>++</b>
Positive Impact	The policy partially supports the achievement of the SA Objective.	<b>+</b>
Neutral/ No Impact	There is no clear relationship between the policy and / or the achievement of the SA Objective or the relationship is negligible.	<b>0</b>
Positive and negative outcomes	The option has a combination of both positive and negative contributions to the achievement of the SA Objective, e.g. a short term negative impact but a longer term positive impact.	<b>+/-</b>
Uncertain outcome	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation at the local level. More information is required to assess the impacts.	<b>?</b>
Negative Impact	The policy partially detracts from the achievement of the SA Objective.	<b>-</b>
Major Negative Impact	The policy strongly detracts from the achievement of the SA Objective.	<b>--</b>

<b>L-T</b>	Effects likely to arise in 10-25 years of Core Strategy implementation
<b>M-T</b>	Effects likely to arise in 5-10 years of Core Strategy implementation
<b>S-T</b>	Effects likely to arise in 0-5 years of Core Strategy implementation
<b>D</b>	Direct effects.
<b>I</b>	Indirect effects.
<b>R</b>	Effects are reversible
<b>IR</b>	Effects are irreversible
<b>H/M/L</b>	High, medium or low certainty of prediction
<b>C</b>	Potential to have cumulative effect with other proposals or plans on this objective

Table 1 Sustainability appraisal of CS7 and Alternative 1

	<b>CS7: The Amount of Housing Required</b>		<b>Alternative 1: Adopted policy 2011</b>	
	The Council has an objectively assessed housing need of 13,550 dwellings at 677 dwellings per annum between 2011 and 2031. Proposes 360 fewer residential dwellings than considered originally in the adopted Core Strategy 2011 between 2011 and 2027. The revised policy proposes 2,710 dwellings between 2027 and 2031 beyond the adopted Core Strategy plan period, which would be 2,800 dwellings if the adopted policy was rolled forward to 2031.		The Regional Spatial Strategy gave the Council a target to allocate land to accommodate at least 15,400 additional residential units between 2001 and 2021. This is equivalent to 770 dwellings per year. However, the Council revised this figure to 700 dwellings per annum through the adopted Core Strategy (14,000 from 2001 to 2021) in the light of additional local evidence.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
ET1 To improve air quality	- <b>S, M –LT D R M C</b>	Fewer residential dwellings are proposed within the revised Policy CS7, which may result in less traffic issues at key roads and junctions depending on the exact location of new development, than the adopted policy. However, the overall projected growth of housing numbers still suggests significant increase in traffic in the areas of the new developments and on the main roads that lead to the city centre and/or to the main employment hubs.  <i>Although the use of sustainable modes of transport is encouraged through other policies in the Core Strategy (e.g. DM16), opportunities should be sought to allocate land in a way that the new residential units are near community facilities/employment hubs.</i>	- - <b>S, M –LT D/I R M C</b>	More dwellings were proposed to be built per year which would result in more traffic generation both during construction and during operation. As result, it is anticipated that under alternative 1 air quality will deteriorate with some significant negative effects in the vicinity of AQMAs.
ET2 To conserve soil resources and quality	- - <b>S, M –LT D I R M C</b>	Although the number of the residential dwellings to be built has decreased, the envisaged housing growth suggests that good quality agricultural land and open countryside will be lost as a result of substantial urban extension.  The use of windfall brownfield sites in urban Ipswich may reduce the impact by allocating more residential dwellings on previously developed land.	- <b>S, M –LT D I R M C</b>	The effects from the implementation of alternative 1 will be similar to those identified for CS7 as both options envisaged significant amount of housing to be built on greenfield land. Alternative 1 has the potential to minimise the negative effects on soil resources through phasing of housing sites and initial focus on PDL.
ET3 To reduce waste	- <b>S, M –LT D/I I R M</b>	It is anticipated that the target to deliver at least 13,550 additional residential dwellings in the borough will generate waste from construction as well as household waste from the growing numbers of new residents.  <i>Opportunities should be sought to encourage recycling within the new housing developments. Facilities should be provided to encourage reuse/recycling.</i>	- - <b>S, M –LT D/I I R M</b>	Alternative 1 will result in more waste generation from construction and operation as a result of more residential dwellings to be built per year.
ET4 To reduce the effects of traffic upon the environment	- <b>S, M –LT D R M C</b>	Whilst the focus of the policy is not to tackle traffic issues, the significant amount of new residential units has the potential to result in pressure on key junctions/roads (on the A12/A14 at Copdock, Seven Hills Interchange and the Orwell Bridge) in peak hours depending on the exact location of development and the provision of appropriate level of public transport to serve the new neighbourhoods.  <i>Mitigation measures to encourage sustainable modes of transport are included in other policies of the Core Strategy DM15, DM16, and DM17.</i>	- - <b>S, M –LT D R M C</b>	Alternative 1 will result in more significant negative effects due to a higher number of housing proposed which will result in more traffic generated during construction and operation.
ET5 To improve access to key services for all sectors of the population	+/- <b>M –LT D R M C</b>	Negative effects may occur where housing is allocated outside the boundary of IP-One area due to the distance of new development from the town centre and most community facilities. In addition, access issues may occur due to congestion on the roads that connect the NF with Ipswich town centre, however, CS10 requires the provision of facilities on site.  Where housing is delivered within IP-One area, it is anticipated that it will contribute to the achievement of the SA objective as the key services will easily accessible by all modes of transport.	+/- <b>M –LT D R M C</b>	Similar negative effects are likely to occur under alternative 1 as it also envisaged development in the NF at a later stage of the plan.  Positive effects are likely to occur where housing is delivered within IP-One area as the key services will easily accessible by all modes of transport.
ET6 To limit and adapt to climate change	- <b>S, M –LT I R M</b>	Although the number of residential dwellings has decreased, the policy envisages the use of greenfield land at an earlier stage of the plan due to the limited amount of PDL sites. Consequently, there is potential for increased flood risk due to change in land use. Changes in land use may affect the generation of water run-off at local scale. Additionally, new homes will use more energy which will result in increase of greenhouse emissions.  <i>Therefore, it will be beneficial to use SuDS to reduce flood risk and manage run-off as required by Core Strategy Policy DM4. .</i>	- <b>S, M –LT I R M</b>	The effects from the implementation of the policy will be similar to those identified in the revised option with occurrence of the negative effects on climate change at a later stage after 2021 due to phased land take at the NF.  Due to more housing anticipated to be built, it is likely that under this alternative the overall CO2 emissions will increase and more land take will be required.

	<b>CS7: The Amount of Housing Required</b>		<b>Alternative 1: Adopted policy 2011</b>	
	<p>The Council has an objectively assessed housing need of 13,550 dwellings at 677 dwellings per annum between 2011 and 2031. Proposes 360 fewer residential dwellings than considered originally in the adopted Core Strategy 2011 between 2011 and 2027. The revised policy proposes 2,710 dwellings between 2027 and 2031 beyond the adopted Core Strategy plan period, which would be 2,800 dwellings if the adopted policy was rolled forward to 2031.</p>		<p>The Regional Spatial Strategy gave the Council a target to allocate land to accommodate at least 15,400 additional residential units between 2001 and 2021. This is equivalent to 770 dwellings per year. However, the Council revised this figure to 700 dwellings per annum through the adopted Core Strategy (14,000 from 2001 to 2021) in the light of additional local evidence.</p>	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	<b>+/-</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	<p>There are areas within the borough boundary that are prone to flooding, particularly those near the Waterfront. Therefore <i>development should be directed to areas of lower flood risk through the Sequential Test process and highly vulnerable development should not be permitted unless there are no alternative sites available.</i></p> <p><i>In addition, the construction of new developments should ensure that the quality of watercourses does not deteriorate through the use of SuDS (See policy DM4).</i></p> <p>Positive effects on water quality may occur where contaminated land is remediated before commencement of construction works.</p>	<b>+/-</b> <b>S,M –LT</b> <b>I/D</b> <b>R</b> <b>M</b> <b>C</b>	<p>Whilst there is a higher environmental risk to affect the water courses where more construction will occur, on the whole it is considered that the effects will be similar to the revised policy.</p> <p>Although more land take will be required to meet the housing target, a higher percentage is allocated to brownfield land which will have indirect benefits with regards to reduced flood risk.</p>
ET8 To conserve and enhance biodiversity and geodiversity , including favourable conditions on SSSIs, SPAs and SACs	<b>+/-</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	<p>Ipswich contains a number of sites of international, national, regional and local importance for nature conservation. Policy CS7 identifies the Northern Fringe as a potential area of new development but that is not considered to pose any environmental risks upon the designated sites located in the southern part of the borough. However, net biodiversity loss is anticipated with regards to loss of greenfield land.</p> <p><i>Opportunities should be sought to enhance the habitats where new development will occur. See policies CS4, DM5 and DM31.</i></p>	<b>O</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	<p>Alternative 1 has a focus on the use of PDL with less impact on biodiversity due to prioritised use of brownfield land. The priority to use greenfield land is envisaged for the period of the plan after 2021.</p>
ET9 To conserve and enhance the historic environment, heritage assets and their settings	<b>-</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	<p>There are a great number of designated heritage assets (e.g. listed buildings) within the borough boundary and the majority of them are concentrated in the town centre. Negative effects are likely to occur where new developments are located near designated heritage assets. <i>If any new development/windfall sites are located in close proximity to designated heritage assets, opportunities should be sought to enhance the condition of existing assets, particularly the ones 'at risk'. See policy DM5.</i></p>	<b>-</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	<p>Since the majority of listing buildings and heritage assets are located in urban Ipswich, alternative 1 has more potential to affect the designated assets as PDL sites are more likely to be within the central urban area.</p>
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	<b>+/-</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	<p>It is anticipated that some development will be located on currently undeveloped agricultural fields which may result in significant change of the landscape character in the more rural areas of the borough. Positive effects will occur in areas where new housing developments will contribute to the regeneration of the town centre with direct benefits on townscape character. <i>Whilst the primary focus of the policy is not to address landscape issues, it is important to ensure that the gaps between Ipswich and neighbouring villages are maintained to preserve local distinctiveness.</i></p>	<b>+/-</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	<p>The likely effects from the implementation of the policy will be similar to those identified with the preferred option.</p>
HW1 To improve the health of those most in need	<b>+</b> <b>M –LT</b> <b>D/I</b> <b>R</b> <b>M</b>	<p>There is a relationship between the provision of decent housing and health. Health deprivation is currently higher than national average and it is anticipated that the policy may contribute to the achievement of the SA objective through additional number of residential units and supply of affordable housing.</p>	<b>+</b> <b>M –LT</b> <b>D/I</b> <b>R</b> <b>M</b>	<p>The likely effects from the implementation of the policy will be similar to those identified with the preferred option.</p>
HW2 To improve the quality of life where people live and encourage community participation	<b>+</b> <b>M –LT</b> <b>D/I</b> <b>R</b> <b>M</b>	<p>The quality of life will be partially improved through the provision of decent housing. The policy on its own is not considered to have any direct effect on community participation.</p>	<b>+</b> <b>M –LT</b> <b>D/I</b> <b>R</b> <b>M</b>	<p>The likely effects from the implementation of the policy will be similar to those identified with the preferred option.</p>
ER1 To reduce poverty and social exclusion	<b>+</b> <b>M –LT</b> <b>I/D</b> <b>R</b> <b>M</b>	<p>The policy may contribute indirectly to the achievement of the SA objective in the long term through the provision of decent homes for the growing population of Ipswich. The issues related to the growing number of homeless people may be tackled through the provision of affordable housing. Central, southwest, and southeast areas are ranked as most deprived. The allocation of land for housing will contribute to the redevelopment/regeneration of the areas. Therefore it is considered that effect will be positive.</p>	<b>+</b> <b>M –LT</b> <b>I/D</b> <b>R</b> <b>M</b>	<p>The policy contributes to the achievement of the SA objective through allocation of land for housing development primarily on PDL (71%) until 2022 in more central areas of Ipswich with some potential to redevelop already deprived areas.</p> <p>I think this should be the same as the revised policy commentary and score. Ok I agree.</p>
ER2 To offer everybody the opportunity for	<b>+</b> <b>S</b>	<p>The primary focus of the policy is not to address employment issues as this is addressed in other policies</p>	<b>+</b> <b>S</b>	<p>Alternative 1 will result in similar effects as the revised policy with slight increase in job opportunities due to higher number of</p>

	<b>CS7: The Amount of Housing Required</b>		<b>Alternative 1: Adopted policy 2011</b>	
	<p>The Council has an objectively assessed housing need of 13,550 dwellings at 677 dwellings per annum between 2011 and 2031. Proposes 360 fewer residential dwellings than considered originally in the adopted Core Strategy 2011 between 2011 and 2027. The revised policy proposes 2,710 dwellings between 2027 and 2031 beyond the adopted Core Strategy plan period, which would be 2,800 dwellings if the adopted policy was rolled forward to 2031.</p>		<p>The Regional Spatial Strategy gave the Council a target to allocate land to accommodate at least 15,400 additional residential units between 2001 and 2021. This is equivalent to 770 dwellings per year. However, the Council revised this figure to 700 dwellings per annum through the adopted Core Strategy (14,000 from 2001 to 2021) in the light of additional local evidence.</p>	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
rewarding and satisfying employment	D/I R L	in the Core Strategy. However, it is considered that in the short term it will contribute to the achievement of the SA objective through increased employment opportunities directly related to the construction of new homes and infrastructure.	D/I R L	residential units and potentially wider infrastructure network required. However the difference between the options is considered to be insignificant as these are considered to be short term effects.
ER3 To help meet the housing requirements for the whole community	+ S, M –LT D R M	<p>The implementation of the policy will contribute to the achievement of the SA objective through the provision of housing (allocating a minimum 5,909 dwellings net by 2031). The policy clearly states that the future delivery of housing will be in accordance with the housing needs identified in the recently updated Strategic Housing Market Assessment.</p> <p>Housing land supply may limit the opportunities to deliver the full amount of projected housing figures despite the initiatives to consider future opportunities beyond the Borough boundaries.</p> <p><i>Opportunities should be sought the reuse the great number of vacant buildings (around 600 are long term vacant).</i></p>	+/- M –LT D/I R M	The policy envisages the supply of a significant amount housing to meet the needs of the growing population. The provision of more residential dwellings suggests higher proportion of affordable housing which will directly contribute to the achievement of the SA objective. However, alternative 1 may also result in oversupply of flats and does not reflect the objectively assessed needs.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	+ M –LT D/I R M	The SA objective will be indirectly achieved through meeting the demand of housing and providing opportunities for the borough to grow and develop. Investment in residential developments will create a number of temporary jobs but also will attract further inward investment by becoming a better place to live.	- M –LT D/I R M	The alternative has the same housing led focus as the revised policy. The allocation of the NF for housing is at a later stage of the plan. The phasing of housing sites is likely to result more difficulties to deliver infrastructure within new development with long periods of construction works which may result in limited opportunities for investment.
ER5 To support vital and viable town, district and local centres	+ S, M –LT D/I R M C	In general terms it is anticipated that housing will be allocated in both the urban areas (e.g. the Waterfront) and in the peripheral parts of the borough (Northern Fringe). The SA objective will be achieved as it is considered that the increase of new residents will have a positive effect on existing town and district centres. New Local and District Centres will be created in the Northern Fringe to meet the needs of the new residents.	+ S, M –LT D/I R M C	The alternative is likely to have similar effects as those identified for the preferred option.
ER6 To encourage efficient patterns of movement in support of economic growth	+/- S, M –LT D I R M	The location and amount of new housing will have a direct effect on patterns of movement across the borough. Some positive effects are likely to occur where housing sites are allocated in the urban central areas within walking distance from the main community facilities and employment hubs. The housing allocated in the periphery of the borough (e.g. IP065) may detract from the SA objective due to the distance to key services and limited public transport options.	+/- S, M –LT D I R M	The alternative is likely to have similar effects as those identified for the preferred option.
ER7 To encourage and accommodate both indigenous and inward investment	+ M –LT D/I R M	Same as ER4.	- M –LT D/I R M	Same as ER4.
CL1 To maintain and improve access to education and skills for both young people and adults	+ S, M –LT D/I R M C	Whilst the preferred option itself does not refer to education needs, it states that the phasing of housing sites will be informed by infrastructure delivery, which includes sites for additional primary schools in the borough. However, other policies address education needs. CS15 has a specific focus on education provision and states that new primary schools provision will be needed to meet the demands of growth. Where housing is allocated in the town centre (IP-One area) a new primary school (IP258) is envisaged to accommodate the amount of population growth. In addition, housing allocated in IP-One area will benefit from the close location of Suffolk New College and University Campus Suffolk. CS10 provides details of all education facilities to be built in the Northern Fringe to achieve the SA objective.	+ S, M –LT D/I R M C	Whilst the provision of more housing will require the additional provision of education facilities, overall it is considered that the alternative is likely to have similar effects as those identified for the preferred option.
CD1 To minimise potential opportunities for crime and anti-social	- S D	Crime rates are higher than national average with high records of organised crime and hate crime amongst others. The growth in population may result in an	- S D	More residential dwellings may result in higher crime rates in the short term particularly in the areas already ranked as most deprived in IP-One area.

	<b>CS7: The Amount of Housing Required</b>		<b>Alternative 1: Adopted policy 2011</b>	
	The Council has an objectively assessed housing need of 13,550 dwellings at 677 dwellings per annum between 2011 and 2031. Proposes 360 fewer residential dwellings than considered originally in the adopted Core Strategy 2011 between 2011 and 2027. The revised policy proposes 2,710 dwellings between 2027 and 2031 beyond the adopted Core Strategy plan period, which would be 2,800 dwellings if the adopted policy was rolled forward to 2031.		The Regional Spatial Strategy gave the Council a target to allocate land to accommodate at least 15,400 additional residential units between 2001 and 2021. This is equivalent to 770 dwellings per year. However, the Council revised this figure to 700 dwellings per annum through the adopted Core Strategy (14,000 from 2001 to 2021) in the light of additional local evidence.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
activity	<b>R L C</b>	increase in thefts in the short term but as this not the only factor that contributes to increase of crime levels, certainty of prediction is rather low.  <i>Mitigation measures would include safety by design principles incorporated in new developments.</i>	<b>R L C</b>	<i>Mitigation measures would include safety by design principles incorporated in new developments.</i>

Table 2 Sustainability appraisal of CS10 and Alternative 1

	<b>CS10: Ipswich Northern Fringe</b>		<b>Alternative 1: Adopted policy 2011</b>	
	<p>The revised policy envisages the development of the whole Northern Fringe (NF) to meet the housing needs assessed in the 2012 SHMA. Originally only 1000 new dwellings were expected to be delivered by 2021; the revised policy is now looking at 3,500 new dwellings for the overall period until 2031.</p>		<p>Land at the Northern Fringe of Ipswich, north of Valley Road / Colchester Road and between Henley Road in the west and Tuddenham Road in the east, will form the main source of supply of housing land in Ipswich after 2021.</p> <p>Due to the limited availability of previously developed land in the rest of the town, the delivery of 1,000 dwellings will be expected to commence prior to 2021 on land to the east of Henley Road and south of the railway line.</p> <p>The indicative capacity at the Northern Fringe identified in the 2010 SHLAA is about 4,500 dwellings.</p>	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
ET1 To improve air quality	<p>- -</p> <p><b>S, M –LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b></p>	<p>Air quality may deteriorate as a result of the envisaged urban extension to the north of the town centre. Although measures to encourage the use of sustainable modes of transport are included in the Core Strategy, travel by private car could remain the main mode of transport to work due to there being no employment land allocated on the site. The indicative number of dwellings is 3,500; hence it is anticipated that negative effects on air quality are likely to occur in the north part of the borough.</p> <p><i>Increase in public transport provision (buses) and more frequent train services to the area may reduce car use.</i></p>	<p>- -</p> <p><b>S, M –LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b></p>	<p>The negative effects associated with air pollution will be anticipated to occur at a later stage due to commencement of construction work in the most northern parts of the area after 2021. However in the long term the indicative capacity is looking at a 1,000 more residential dwellings within the plan period with increased potential for congestion issues on the key roads. Therefore, it is considered that the overall effect will be negative.</p>
ET2 To conserve soil resources and quality	<p>-</p> <p><b>S, M –LT</b> <b>D</b> <b>IR</b> <b>M</b> <b>C</b></p>	<p>The site consists of 195ha of good quality agricultural land; 1/3 of the land will be allocated for open space and a country park, which will partially contribute to the achievement of the SA objective but <i>opportunities may be sought to allocate land for allotments to make use of the good quality agricultural land.</i></p>	<p>- -</p> <p><b>S, M –LT</b> <b>D</b> <b>IR</b> <b>M</b> <b>C</b></p>	<p>The alternative is likely to result in negative effects associated with land take and loss of good quality agricultural land. It is anticipated that significant negative effects will occur at a later stage due to commencement of development of the whole Northern Fringe area after 2021. However in the long term the indicative capacity is looking at a 1,000 more residential dwellings within the plan period with larger area required to meet the housing needs. Therefore, it is considered that the overall effect will be negative.</p>
ET3 To reduce waste	<p>-</p> <p><b>S, M –LT</b> <b>D/I</b> <b>IR</b> <b>M</b></p>	<p>Although the indicative capacity of the NF has been reduced to 3,500 new homes, it is anticipated that the development will result in negative effects associated with waste generation due to a significant amount of new households in the borough.</p> <p><i>Opportunities should be sought to increase the percentage of reused or recycled household waste. Key waste materials during the construction of new housing should also be reused / recycled. See policy CS4.</i></p>	<p>- -</p> <p><b>S, M –LT</b> <b>D/I</b> <b>IR</b> <b>M</b></p>	<p>In the long term alternative 1 is likely to detract from the SA objective due to more residential dwellings allocated in the NF, more key waste from construction activities and more household waste during operation.</p>
ET4 To reduce the effects of traffic upon the environment	<p>-</p> <p><b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b></p>	<p>Whilst the focus of the policy is not to tackle traffic issues, the significant amount of new residential units has the potential to result in pressure on key junctions/roads in peak hours depending on the provision of appropriate level of public transport to serve the new neighbourhoods in the NF. Positive effects are likely to occur with the implementation of <i>DM15, DM16, and DM17 of the plan.</i></p>	<p>-</p> <p><b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b></p>	<p>Alternative 1 will result in more significant negative effects due to a higher number of housing proposed which will result in more traffic generated during construction and operation.</p>
ET5 To improve access to key services for all sectors of the population	<p>+</p> <p><b>M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b></p>	<p>The policy will contribute to the achievement of the SA objective through ensuring that any development in the Northern Fringe includes green walking and cycling links to Westerfield station.</p> <p>Significant infrastructure will be put in place to meet the needs of the new neighbourhoods including public transport routes and services.</p> <p>CS10 ensures that the access to services in the Northern Fringe will <i>be improved including new transport routes and services.</i></p> <p><i>In addition, some key services will be provided locally to meet the demands of the new residents.</i></p>	<p>+</p> <p><b>M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b></p>	<p>The alternative is likely to have similar effects as those identified for the revised policy.</p>
ET6 To limit and adapt to climate change	<p>-</p> <p><b>S, M – LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b></p>	<p>The policy envisages the use of greenfield land due to limited amount of PDL sites in the Borough. Consequently, there is potential for increased flood risk due to change in land use. Changes in land use may affect the generation of water run-off at local scale. Additionally, new homes will use more energy which will result in increase of greenhouse emissions.</p> <p><i>Therefore, it will be beneficial to use SuDS to reduce flood risk and manage run-off. See policy DM4.</i></p> <p><i>Greenhouse emissions could be reduced through the requirement for new developments to incorporate Code</i></p>	<p>- -</p> <p><b>S, M – LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b></p>	<p>In the short term, the effects from the implementation of the policy will be similar to those identified in the revised option with occurrence of the negative effects on climate change at a later stage (after 2021) due to phased land take at the NF. However, in the long term the overall CO2 emissions will increase and more land take will be required due to more housing anticipated to be built. Therefore, it is likely that the alternative will strongly detract from the SA objective.</p>

	<b>CS10: Ipswich Northern Fringe</b>		<b>Alternative 1: Adopted policy 2011</b>	
	<p>The revised policy envisages the development of the whole Northern Fringe (NF) to meet the housing needs assessed in the 2012 SHMA. Originally only 1000 new dwellings were expected to be delivered by 2021; the revised policy is now looking at 3,500 new dwellings for the overall period until 2031.</p>		<p>Land at the Northern Fringe of Ipswich, north of Valley Road / Colchester Road and between Henley Road in the west and Tuddenham Road in the east, will form the main source of supply of housing land in Ipswich after 2021.</p> <p>Due to the limited availability of previously developed land in the rest of the town, the delivery of 1,000 dwellings will be expected to commence prior to 2021 on land to the east of Henley Road and south of the railway line.</p> <p>The indicative capacity at the Northern Fringe identified in the 2010 SHLAA is about 4,500 dwellings.</p>	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
		<i>for Sustainable Homes and BREAAAM standards.</i>		
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	- <b>S,M – LT D R M C</b>	<p>The Northern Fringe site lies partially over a Zone 2 (outer zone) groundwater Source Protection Zone and partially over Secondary A (bedrock and superficial deposits) aquifers.</p> <p>The use of greenfield land for residential use will result in loss of infiltration and increased flood risk in the area. Therefore <i>new developments should be encouraged to use SuDS to manage runoff, reduce further flood risk and protect water quality. See policy DM4.</i></p>	- - <b>S,M – LT D R M C</b>	<p>The provision of more residential dwellings may result in higher environmental risks associated with pollution of water courses in the area of new development.</p> <p>In addition, more land take will be required to meet the housing target which is likely to increase the flood risk in the northern parts of the borough.</p>
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	+/- <b>S,M –LT D R M C</b>	<p>On the whole, the implementation of the policy will result in loss of open countryside and good quality farm land which will have indirect negative impact on biodiversity and potentially affect protected species using the land. Positive effects are likely to occur through green infrastructure and the allocation of land for County Park and retaining existing hedgerows and trees which are the key features of wildlife value.</p> <p>Designated sites are located at a significant distance from the Northern Fringe area and are unlikely to be affected by new development.</p> <p><i>Opportunities should be sought to create/enhance the habitats where new developments will occur.</i></p>	- <b>S,M –LT D R M C</b>	<p>In general terms the effects from the implementation of the policy will be similar to those identified with the preferred option. However, in the long term more land take will be required to allocate 1,000 more new residential dwellings with direct negative effects on biodiversity from noise disturbance, pollution, etc..</p> <p>Not necessarily. It depends on densities used, so the development could occupy the same land area as 3,500 dwellings BUT I would say that the additional residents from a higher number of homes would create greater disturbance to wildlife so that's a negative. Impact would also depend on how well biodiversity features e.g. swift bricks and bat boxes are incorporated into new buildings.</p>
ET9 To conserve and enhance the historic environment, heritage assets and their settings	- <b>S,M –LT D R M C</b>	<p>There are a number of Listed Buildings within the vicinity of the Northern Fringe area: Sparrowe's Nest and Farm (several structures, Grade II) is adjacent to a proposed development block, though protected by screen planting. Other buildings such as Cranfield Court to the southeast (Grade II) are set within existing residential areas.</p> <p>Red House Farm is locally listed and set within the site area. The 19<sup>th</sup> Century farm and outbuildings as well as the farm garden and woodland to the north of the site will be directly affected by the redevelopment of the area, both through the impact of adjacent development and the potential adaptation of the farm buildings and open land.</p> <p><i>New development should ensure that the heritage assets located within the Northern Fringe area and near its boundary are not adversely affected, through appropriate design, in particular in terms of scale, height, massing, and alignment of new development. In addition, the setting of listed buildings could be conserved through the use of traditional or sympathetic building materials and techniques. Any work to Red House farm should preserve the layout of key structures, including the outbuildings, and the use of historic materials in their construction. Key landscape features nearby, such as the woodland, should be protected from redevelopment. New build within and near to the farm site should sensitively interpret the materials, scale and form of existing buildings.</i></p>	- <b>S,M –LT D R M C</b>	<p>The alternative is likely to have similar effects as those identified for the revised policy.</p>
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	- <b>S,M –LT D R M C</b>	<p>It is anticipated that new development will be located on currently undeveloped agricultural fields which will result in significant change of the landscape character of this more rural area of the borough.</p> <p>The policy clearly states that new development will maintain an appropriate physical separation of Westerfield village from Ipswich and include green walking and cycling links to Westerfield station thus reducing the negative effect on landscape.</p>	- - <b>S,M –LT D R M C</b>	<p>The provision of more residential dwellings may result in higher density of housing in the NF with direct negative effects on local character through creating a highly urbanised area, loss of open space and less land allocated for County park and allotments.</p>

	<b>CS10: Ipswich Northern Fringe</b>		<b>Alternative 1: Adopted policy 2011</b>	
	The revised policy envisages the development of the whole Northern Fringe (NF) to meet the housing needs assessed in the 2012 SHMA. Originally only 1000 new dwellings were expected to be delivered by 2021; the revised policy is now looking at 3,500 new dwellings for the overall period until 2031.		Land at the Northern Fringe of Ipswich, north of Valley Road / Colchester Road and between Henley Road in the west and Tuddenham Road in the east, will form the main source of supply of housing land in Ipswich after 2021.  Due to the limited availability of previously developed land in the rest of the town, the delivery of 1,000 dwellings will be expected to commence prior to 2021 on land to the east of Henley Road and south of the railway line.  The indicative capacity at the Northern Fringe identified in the 2010 SHLAA is about 4,500 dwellings.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
		The local distinctiveness should also be ensured through appropriate design of new development <i>particularly in terms of scale, height, massing, and alignment.</i>		
HW1 To improve the health of those most in need	<b>+/- M -LT D/I R M</b>	Some negative effects are likely to occur due to loss of a large area of open countryside, including some indirect negative effect associated with deterioration of the air quality in the north part of the borough.  As identified previously for policy CS7, the provision of decent housing will contribute to the achievement of the SA objective.  In addition, policy CS10 ensures healthy lifestyles through the allocation of land for a Country Park, public space, and a new health centre.  For these reasons it is considered that the effects will be both positive and negative.	<b>- M -LT D/I R M</b>	In the long term, the provision of more residential dwellings is likely to result in higher density of housing in the NF with direct negative effects associated with loss of open countryside and less land allocated for County park/ allotments, deterioration of air quality due to increase of traffic and dust from construction. Therefore it is considered that the overall effect will be negative.
HW2 To improve the quality of life where people live and encourage community participation	<b>+ M -LT D/I R M</b>	The land to the west of Tuddenham Road north of the railway line is allocated for the replacement playing fields and has the potential to encourage community participation. Additionally, a multi-use community centre will be built as part of the new District Centre thus contributing directly to the achievement of the SA objective.	<b>+ M -LT D/I R M</b>	The alternative is likely to have similar effects as those identified for the preferred option.
ER1 To reduce poverty and social exclusion	<b>+/- M -LT I/D R M</b>	The area of the Northern Fringe is currently ranked as least deprived potentially due to its rural character. New development may result in increase of crime and antisocial activities with some negative effects on deprivation. However, on the whole the provision of new decent homes may reduce deprivation levels at borough level (See CS7).	<b>+/- M -LT I/D R M</b>	The alternative is likely to have similar effects as those identified for the preferred option.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	<b>+ S, M I/D R M</b>	The SA objective will be achieved through the allocation of land for retail uses, and employment opportunities directly related to the construction of new homes and community facilities.	<b>+ S, M I/D R M</b>	Alternative 1 will result in similar effects as the revised policy with slight increase in job opportunities due to higher number of residential dwellings and potentially wider infrastructure network required. However the difference between the options is considered to be insignificant as these are considered to be short term effects.
ER3 To help meet the housing requirements for the whole community	<b>+ + S, M -LT D R M</b>	Policy CS10 will directly contribute to the achievement of the SA objective through the allocation of land for a residential development of approximately 3,500 dwellings.  The number of dwellings has been reduced to reflect the capacity of the area. However, it is anticipated that the type of dwellings will address the needs identified in the updated SHMA 2012 with regards to the provision of variety of housing types (two and three bedroom houses).	<b>+ + S, M -LT D R M</b>	The policy envisages the supply of a significant amount housing to meet the needs of the growing population. The provision of more residential dwellings suggests higher proportion of affordable housing which will directly contribute to the achievement of the SA objective.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	<b>+ M -LT D/I R M</b>	The SA objective will be indirectly achieved through meeting the demand of housing and providing opportunities for the borough to grow and develop. Investment in residential developments will create a number of temporary jobs but also will attract further inward investment by becoming a better place to live.	<b>- M -LT D/I R M</b>	The alternative has the same housing led focus as the revised policy. The allocation of the entire NF area for housing is at a later stage of the plan. The phasing of housing sites is likely to result more difficulties to deliver infrastructure within new development with long periods of construction works which may result in limited opportunities for investment.
ER5 To support vital and viable town, district and local centres	<b>+ S, M -LT D/I R M C</b>	The development of the Northern Fringe is likely to affect the viability of Ipswich town centre by drawing away customers as the policy envisages the creation of new District and Local Centres in the Northern Fringe to meet the local needs. However, as it is also considered that the new development will not simply result in relocation of residents but will also attract new residents, which will have a positive effect on both the town centre and district and local centres. Therefore, it is anticipated that the effects will be both positive and negative.	<b>+ S, M -LT D/I R M C</b>	The alternative is likely to have similar effects as those identified for the preferred option.
ER6 To encourage efficient patterns of	<b>+ S, M -LT</b>	The SA objective will be achieved through the provision of new roads, cycling routes, public transport routes and	<b>+ S, M -LT</b>	The implementation of the alternative is likely to result in similar

	<b>CS10: Ipswich Northern Fringe</b>		<b>Alternative 1: Adopted policy 2011</b>	
	<p>The revised policy envisages the development of the whole Northern Fringe (NF) to meet the housing needs assessed in the 2012 SHMA. Originally only 1000 new dwellings were expected to be delivered by 2021; the revised policy is now looking at 3,500 new dwellings for the overall period until 2031.</p>		<p>Land at the Northern Fringe of Ipswich, north of Valley Road / Colchester Road and between Henley Road in the west and Tuddenham Road in the east, will form the main source of supply of housing land in Ipswich after 2021.</p> <p>Due to the limited availability of previously developed land in the rest of the town, the delivery of 1,000 dwellings will be expected to commence prior to 2021 on land to the east of Henley Road and south of the railway line.</p> <p>The indicative capacity at the Northern Fringe identified in the 2010 SHLAA is about 4,500 dwellings.</p>	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment <i>Mitigation / Enhancement Measures</i></b>	<b>Impact</b>	<b>Comment <i>Mitigation / Enhancement Measures</i></b>
movement in support of economic growth	D/ R M C	services to connect the Northern Fringe development with the town centre and other areas. In addition, efficient patterns of movement will be encouraged through the provision of a range of community facilities within the new neighbourhoods within walking distance of new homes (e.g. park, library, District Centre, etc.).	D/ R M C	effects as those identified for the preferred option.
ER7 To encourage and accommodate both indigenous and inward investment	+ M –LT D/ R M	The SA objective will be indirectly achieved through meeting the demand of housing and providing opportunities for the borough to grow and develop. Investment in residential developments will create a number of temporary jobs but also will attract further inward investment by becoming a better place to live.	- M –LT D/ R M	The alternative has the same housing led focus as the revised policy. The allocation of the entire NF area for housing is at a later stage of the plan. The phasing of housing sites is likely to result more difficulties to deliver infrastructure within new development with long periods of construction works which may result in limited opportunities for investment.
CL1 To maintain and improve access to education and skills for both young people and adults	+ S, M –LT D/ R M C	There is a need to improve educational attainment in the Borough as it is considered that low skill levels and the mismatch between supply and demand of qualified young people is one of the main barriers to economic growth. The revised policy is more specific in the provision of education facilities such as schools, library, etc. The policy envisages the delivery of three primary schools, a secondary school and sixth form to meet the needs of the residents in the new neighbourhoods. Although the provision of these facilities will contribute to the achievement of the SA objective it would be beneficial <i>if opportunities to provide facilities for training and further education for adults are also considered.</i>	? S, M –LT D/ R M C	Whilst alternative 1 states that schools will be provided with new development in the NF it does not include specific details of how the SA objective will be achieved. Therefore, it is considered that alternative 1 is less likely to contribute to the achievement of the SA objective and the overall effect will be negligible.
CD1 To minimise potential opportunities for crime and anti-social activity	- S D R L C	Crime rates are higher than national average with high records of organised crime and hate crime amongst others. The growth in population may result in an increase in thefts in the short term but as this not the only factor that contributes to increase of crime levels, certainty of prediction is rather low.  <i>Mitigation measures would include safety by design principles incorporated in new developments.</i>	- S D R L C	More residential dwellings may result in higher crime rates in the short term particularly in the areas already ranked as most deprived in IP-One area.  <i>Mitigation measures would include safety by design principles incorporated in new developments.</i>

Table 3 Sustainability appraisal of CS13 and Alternative 1

	<b>CS13: Planning for Jobs Growth</b>		<b>Alternative 1: Adopted policy 2011</b>	
	The policy will encourage the provision in the region of 12,500 jobs between 2011 and 2031. In allocating sites for employment development, the Council will take account of the sectors projected to have the highest jobs growth over the plan period as identified in the Suffolk Growth Strategy. These include: advanced manufacturing and technology; energy; information and communication technology; finance and insurance; food, drink and agriculture; ports and logistics; life sciences, biotechnology and bloodstock; tourism; and creative and cultural industries.		The Council will promote sustainable economic growth in the Ipswich Policy Area. It will encourage the provision of at least 18,000 jobs between 2001 and 2025. In allocating sites for employment development, the Council will take account of the sectors projected to have the highest jobs growth between 2006 and 2026 as identified in the Suffolk Haven Gateway Employment Land Review (2009). These include construction; retail / hotels; distribution; finance and other business services; and public services.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
ET1 To improve air quality	<b>+/-</b> <b>S, M –LT</b> <b>I</b> <b>R</b> <b>L</b> <b>C</b>	Whilst the primary focus of the revised policy is not to tackle air quality issues, it is considered that the appropriate allocation of employment land may result in improvement of air quality if it is easily accessible by sustainable modes of transport. The policy focuses on the provision of jobs within the borough which may reduce longer commuting trips outside the borough. The former Crane’s site is a strategic employment site with good public transport accessibility. Therefore it is anticipated that in the long term there will be some indirect positive effects on air quality but the level of certainty of prediction is rather low.	<b>-</b> <b>S, M –LT</b> <b>I</b> <b>R</b> <b>L</b> <b>C</b>	Alternative 1 would potentially result in more land allocated for employment use due to commitment to provide more jobs. Indirect negative effects on air quality are likely to occur due to residents in the neighbouring authorities commuting to the employment hubs in central Ipswich as a result of increased employment opportunities. Therefore it is anticipated that in the long term more indirect negative effects on air quality are likely to occur but the level of certainty of prediction is low.
ET2 To conserve soil resources and quality	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The policy focuses primarily on the allocation of land for employment use; much of it is previously developed land (former Crane’s factory). The former Crane’s site is an example of a contaminated land which has been redeveloped successfully for its current use and <i>more opportunities should be sought to remediate other potential employment sites.</i>	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in similar effects as those identified for the preferred option.
ET3 To reduce waste	<b>-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The revised policy would potentially result in land allocated for employment use due to commitment to provide jobs. Waste is likely to be generated during operation of employment sites, if appropriate mitigation measures are not in place.  <i>Opportunities should be sought to encourage recycling within the new employment hubs.</i>	<b>-</b> <b>S, M –LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	Alternative 1 would potentially result in more land allocated for employment use due to commitment to provide more jobs. More waste is likely to be generated during operation of employment sites, if appropriate mitigation measures are not in place.  It also seems odd to have a different score for Alt 1 – I think it should be the same as the revised policy for consistency.
ET4 To reduce the effects of traffic upon the environment	<b>+/-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The policy will contribute to the achievement of the SA objective through the allocation of land for employment at sites that have good public transport accessibility (e.g. former Crane’s factory).	<b>-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>L</b> <b>C</b>	Same as ET1.
ET5 To improve access to key services for all sectors of the population	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	There is no clear relationship between the policy and / or the achievement of the SA Objective or the relationship is negligible.	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	There is no clear relationship between the policy and / or the achievement of the SA Objective or the relationship is negligible.
ET6 To limit and adapt to climate change	<b>+/-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>L</b>	Allocating land for employment uses in central urban areas well served by public transport may reduce the need to travel by private car. In addition allocating land for employment use near existing employment hubs (e.g. IP051) may encourage car-share schemes. New employment sites will however use energy and cumulatively will detract from the SA objectives unless mitigation measures are place. For these reasons, it is considered that effects will be both positive and negative.  <i>Greenhouse emissions could be reduced through requirement for new business buildings to incorporate BREAAAM standards. See Policy DM1.</i>	<b>+/-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in similar effects as those identified for the preferred option. Again it seems inconsistent to have a different score here from the revised policy.
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	The main areas of employment are not located in or near Flood zone 2 and 3 and the majority of allocations are on brownfield land. In addition, there no strategic site allocations for employment use near the main water features and none of the growth sectors suggest heavy industrial pollution which reduces significantly the risk of water pollution during construction and operation. Therefore it is considered that the overall effect from the implementation of the policy will be neutral.	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	The implementation of the alternative is likely to result in similar effects as those identified for the preferred option.
ET8 To conserve and enhance biodiversity and geodiversity ,	<b>+</b> <b>M –LT</b> <b>I</b>	The majority of employment land and strategic employment sites are allocated at a significant distance from designated sites for nature conservation. The sites	<b>+</b> <b>M –LT</b> <b>I</b>	The majority of employment land and strategic employment sites are allocated at a significant distance from designated sites for nature conservation. The allocated land for

	<b>CS13: Planning for Jobs Growth</b>		<b>Alternative 1: Adopted policy 2011</b>	
	<p>The policy will encourage the provision in the region of 12,500 jobs between 2011 and 2031. In allocating sites for employment development, the Council will take account of the sectors projected to have the highest jobs growth over the plan period as identified in the Suffolk Growth Strategy. These include: advanced manufacturing and technology; energy; information and communication technology; finance and insurance; food, drink and agriculture; ports and logistics; life sciences, biotechnology and bloodstock; tourism; and creative and cultural industries.</p>		<p>The Council will promote sustainable economic growth in the Ipswich Policy Area. It will encourage the provision of at least 18,000 jobs between 2001 and 2025. In allocating sites for employment development, the Council will take account of the sectors projected to have the highest jobs growth between 2006 and 2026 as identified in the Suffolk Haven Gateway Employment Land Review (2009). These include construction; retail / hotels; distribution; finance and other business services; and public services.</p>	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
including favourable conditions on SSSIs, SPAs and SACs	<b>R M C</b>	<p>located near the River Orwell (e.g. IP067) will require <i>further project level assessments to ensure that mitigation measures are applied for potential significant negative effects.</i></p> <p>The land for employment will be allocated through the Site Allocations and Policies DPD and it is anticipated that previously developed land will be used where possible. The policy will contribute to the SA objective if possible contamination is remediated with indirect positive effects on water quality and soil resources. Therefore, the effect is considered to be beneficial in the long term.</p>	<b>R M C</b>	<p>employment use is brownfield. The policy will contribute to the SA objective if possible contamination is remediated with indirect positive effects on water quality and soil resources. Therefore, the effect is considered to be beneficial in the long term.</p>
ET9 To conserve and enhance the historic environment, heritage assets and their settings	<b>- S, M -LT D R M C</b>	<p>The location of strategic employment sites does not suggest any significant negative effects on areas/sites of historical importance. Sites allocated for employment/retail use within the IP-one area (e.g. IP035, IP051, etc.) are likely to affect designated heritage assets as there is a concentration of a great number of listed building in the town centre.</p> <p><i>Where new development is located near listed buildings mitigation measures should be implemented to avoid any significant negative effects through appropriate design techniques.</i></p> <p>Please see CS7 comment on ET9. Surely other CS policies and national policy would prevent any harm. New development could enhance CAs or the setting of listed buildings.</p>	<b>- S, M -LT D R M C</b>	<p>The location of strategic employment sites does not suggest any significant negative effects on areas/sites of historical importance. Sites allocated for employment/retail use in urban town centre are likely to affect designated heritage assets as there is a concentration of great number of listed building in the town centre.</p> <p><i>Where new development is located near listed buildings mitigation measures should be implemented to avoid any significant negative effects through appropriate design techniques.</i></p>
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	<b>+ S, M -LT D R M C</b>	<p>The majority of new employment development sites are allocated in urban areas where positive effects on townscape may occur as part of any redevelopment/regeneration schemes.</p>	<b>+ S, M -LT D R M C</b>	<p>The implementation of the alternative is likely to result in similar effects as those identified for the preferred option.</p>
HW1 To improve the health of those most in need	<b>+ M -LT I R M</b>	<p>The policy will indirectly contribute to the achievement of the SA objective through creating more employment opportunities in the borough thus improving the mental health and overall deprivation and reducing poverty.</p>	<b>+ + M -LT I R M</b>	<p>The policy will indirectly contribute to the achievement of the SA objective through creating more employment opportunities in the borough thus improving the mental health and overall deprivation.</p>
HW2 To improve the quality of life where people live and encourage community participation	<b>+ M -LT D/I R M</b>	<p>The policy will contribute to the achievement of the SA objective through supporting the growth of educational facilities and initiatives to improve skills and qualifications levels. The level of educational attainment is low and the local partnerships may have a positive effect on the comprehensive development of the borough and the quality of life.</p>	<b>+ M -LT D/I R M</b>	<p>The implementation of the alternative is likely to result in similar effects as those identified for the preferred option.</p>
ER1 To reduce poverty and social exclusion	<b>+ + M -LT D/I R M</b>	<p>The primary focus of the policy is to promote sustainable economic growth and encourage the provision of a significant number of jobs mainly through the allocation of land for employment and employment generating uses (e.g. education, leisure, etc.). Therefore it is considered that it will contribute to the achievement of the SA objective.</p>	<b>+ + M -LT D/I R M</b>	<p>The primary focus of the policy is to promote sustainable economic growth and encourage the provision of a significant amount of jobs mainly through the allocation of land for employment and employment generating uses (e.g. education, leisure, etc.). Therefore it is considered that it will contribute to the achievement of the SA objective.</p>
ER2 To offer everybody the opportunity for rewarding and satisfying employment	<b>+ + S, M -LT D/I R M C</b>	<p>Although the job figure is lower than that previously identified, it reflects the most recent Forecasting Model in 2012. The revised policy includes a wider range of growth sectors and the SA objective will be achieved through the allocation and protection of employment land and through the joint work with local partners to encourage sustainable growth. As a result, it is anticipated that further employment opportunities will be created.</p>	<b>+ + S, M -LT D/I R M C</b>	<p>The alternative strongly supports the achievement of the SA objective through the provision of employment opportunities that reflect the needs identified at an earlier stage of the plan.</p>
ER3 To help meet the housing requirements for the whole community	<b>0 S, M -LT D I R M</b>	<p>The housing provision is not a primary function of this policy.</p>	<b>0 S, M -LT D I R M</b>	<p>The housing provision is not a primary function of this policy.</p>

	<b>CS13: Planning for Jobs Growth</b>		<b>Alternative 1: Adopted policy 2011</b>	
	The policy will encourage the provision in the region of 12,500 jobs between 2011 and 2031. In allocating sites for employment development, the Council will take account of the sectors projected to have the highest jobs growth over the plan period as identified in the Suffolk Growth Strategy. These include: advanced manufacturing and technology; energy; information and communication technology; finance and insurance; food, drink and agriculture; ports and logistics; life sciences, biotechnology and bloodstock; tourism; and creative and cultural industries.		The Council will promote sustainable economic growth in the Ipswich Policy Area. It will encourage the provision of at least 18,000 jobs between 2001 and 2025. In allocating sites for employment development, the Council will take account of the sectors projected to have the highest jobs growth between 2006 and 2026 as identified in the Suffolk Haven Gateway Employment Land Review (2009). These include construction; retail / hotels; distribution; finance and other business services; and public services.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	<b>++</b> <b>S,M -LT</b> <b>D/I</b> <b>R</b> <b>M</b>	There is a strong commitment in the policy to encourage sustainable levels of prosperity through local partnerships and land supply for employment. In addition, it is considered that the support of higher educational facilities will have a long-term positive effect on economic growth as it may tackle issues with low skills and qualification levels.	<b>++</b> <b>S,M -LT</b> <b>D/I</b> <b>R</b> <b>M</b>	The implementation of the alternative is likely to result in similar effects as those identified for the preferred option.
ER5 To support vital and viable town, district and local centres	<b>O</b> <b>S, M -LT</b> <b>D</b> <b>R</b> <b>M</b>	Positive effects are likely to occur where employment sites are allocated near Local and District centres (e.g. IP147) and thus contributing to the achievement of the SA objective. However, it is considered that the overall effect will be negligible as the majority of new employment sites are at a distance from Local or District centres.	<b>O</b> <b>S, M -LT</b> <b>D</b> <b>R</b> <b>M</b>	The implementation of the alternative is likely to result in the same effects as those identified for the preferred option.
ER6 To encourage efficient patterns of movement in support of economic growth	<b>+</b> <b>M -LT</b> <b>D/I</b> <b>R</b> <b>M</b>	Efficient patterns of movement will be encouraged through the allocation of land for employment use in areas that are easily accessible by public transport (e.g. former Crane's factory site which is currently served by four buses).	<b>+/-</b> <b>S,M -LT</b> <b>D</b> <b>R</b> <b>L</b> <b>C</b>	Whilst it is recognised that positive effects are likely to occur where employment site allocations are in areas easily accessible by public transport, it is likely that more job opportunities in Ipswich will attract residents from neighbouring authorities and the daily commutes may increase. Therefore it is considered that the effects from the implementation of the policy will be both positive and negative depending on location of main work force groups of the population.
ER7 To encourage and accommodate both indigenous and inward investment	<b>+</b> <b>M -LT</b> <b>D/I</b> <b>R</b> <b>M</b>	The policy will contribute directly to the achievement of the SA objective through allocation of sufficient land for employment use including leisure, hospitality and retail. In addition, the policy clearly states that employment uses in existing employment areas will be protected which may encourage further investment in the borough.	<b>++</b> <b>M -LT</b> <b>D/I</b> <b>R</b> <b>M</b>	The policy strongly supports the achievement of the SA objective through allocation of sufficient land for employment use including leisure, hospitality and retail. In addition, the policy clearly states that employment uses in existing employment areas will be protected which may encourage further investment in the borough.
CL1 To maintain and improve access to education and skills for both young people and adults	<b>+</b> <b>S</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	Same as HW2 and ER4.	<b>++</b> <b>S, M -LT</b> <b>D/I</b> <b>R</b> <b>L</b> <b>C</b>	More opportunities for training and education may arise with the provision of additional jobs in the borough. However, the level of certainty is considered to be low as the correlation between job opportunities and education is not direct.
CD1 To minimise potential opportunities for crime and anti-social activity	<b>+</b> <b>S</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	Whilst there is no direct relationship between the policy and the achievement of the SA objective, it is considered that employment growth may result in overall reduction of poverty thus decrease in crime levels in the long term.	<b>+</b> <b>S</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the preferred option.

Table 4 Sustainability appraisal of CS14 and Alternative 1

	<b>CS14: Retail development</b>		<b>Alternative 1: Adopted Policy 2011</b>	
	Through the Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD, the Council intends to extend the Central Shopping Area to include the Westgate quarter and allocate sites for retail development within it. This will enable the delivery in the region of 15,000 sqm net of additional floorspace to diversify and improve the retail offer. Further allocations will be made through the Site Allocations DPD review following a review of the Retail capacity study to address provision after 2026.		Through the IP-One Area Action Plan, the Council will extend the Central Shopping Area to include the Westgate quarter and the land south of Crown Street and Old Foundry Road and allocate sites for retail development within it. This will enable the delivery of at least 35,000 sqm net of additional floorspace to diversify and improve the retail offer.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
ET1 To improve air quality	- <b>S, M –LT D R M C</b>	The revised policy envisages retail floorspace to be allocated in the Central Shopping Area which is largely pedestrianized and accessible by bicycle. Additionally the town centre is well served by public transport which may reduce the need to travel by private car.  However, additional retail floorspace may result in increase of trips to the shopping areas by residents within the borough and from neighbouring areas. As a result, traffic is likely to increase on the main approach roads to and from Ipswich causing deterioration of air quality.  <i>Park and ride facilities in the peripheral areas of the borough may encourage people to use sustainable modes of transport to the main shopping area in the town centre.</i>	- <b>S, M –LT D/I R M C</b>	Additional retail floorspace may result in increase of trips to the shopping areas by residents within the borough and from neighbouring areas. As a result, traffic is likely to increase on the main approach roads to and from Ipswich causing deterioration of air quality.  <i>Park and ride facilities in the peripheral areas of the borough may encourage people to use sustainable modes of transport to the main shopping area in the town centre.</i>
ET2 To conserve soil resources and quality	+ <b>S, M –LT D R M</b>	The policy focuses primarily on the allocation of land for retail use on previously developed land at Westgate.	+ <b>S, M –LT D R M</b>	The policy focuses primarily on the allocation of land for retail use on previously developed land at Westgate.
ET3 To reduce waste	- <b>S, M –LT D R M</b>	Some positive effects will occur if the vacant premises in the town centre are brought back into active use as stated in the policy. However, more waste is likely to be generated from the delivery of more retail floorspace and the operation activities of the new retail developments. Cumulatively, together with the housing and employment led policies, waste generation may have a significant negative effect on the environmental objectives in the long term if mitigation measures are not in place.  <i>Reuse/recycling should be encouraged.</i>	- <b>S, M –LT D/I R M</b>	More waste is likely to be generated from the delivery of more retail floorspace and the operation activities of the new retail developments. Cumulatively, together with the housing and employment led policies, waste generation may have a significant negative effect on the environmental objectives in the long term if mitigation measures are not in place.  <i>Reuse/recycling should be encouraged.</i>
ET4 To reduce the effects of traffic upon the environment	+ <b>S, M –LT D R L C</b>	The policy will contribute to the achievement of the SA objective through additional retail site allocations in the Central Shopping Area and key district centres within walking distance from residential areas and well served by public transport.	+ <b>S, M –LT D/I R L C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the preferred option.
ET5 To improve access to key services for all sectors of the population	+ <b>M –LT D R M C</b>	The SA objective will be achieved through the enhancement of facilities available in district centres and providing more choice for local residents within walking distance of their homes.	+ <b>M –LT D R M C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the preferred option.
ET6 To limit and adapt to climate change	+ <b>LT D R L C</b>	The policy on its own will have negligible effect on climate change, but cumulatively, allocating retail sites in locations with pedestrian access and promoting public transport services may result in less use of private cars as the main transport mode.	+ <b>S, M –LT D R M C</b>	The policy on its own will have negligible effect on climate change, but cumulatively, allocating retail sites in locations with pedestrian access and promoting public transport services may result in less use of private cars as a the main transport mode.
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	<b>0 S, M –LT D R M</b>	The policy promotes extension of the Central Shopping area to include Westgate Quarter which is not located in Flood zone 2 or 3. Therefore it is considered that the effect will be neutral.	<b>0 S, M –LT D R M</b>	The policy promotes extension of the Central Shopping area to include Westgate Quarter and the land south of Crown Street and Old Foundry Road which is not located in Flood zone 2 or 3. Therefore it is considered that the effect will be neutral.
ET8 To conserve and enhance biodiversity and geodiversity , including favourable conditions on SSSIs,	<b>0 M –LT I R M C</b>	The central shopping area will be extended westwards and is unlikely that any designated sites (located in the south part of the borough) will be affected. The land for retail use will be allocated through the Site Allocations and Policies DPD and it is anticipated that previously	<b>0 M –LT I R M C</b>	Alternative 1 envisages extension of the central shopping area both to the west and the east of the existing retail area. It is unlikely that any designated sites (located in the south part of the borough) will be affected from the extension. The alternative will contribute to the SA objective if possible contamination is

	<b>CS14: Retail development</b>		<b>Alternative 1: Adopted Policy 2011</b>	
	Through the Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD, the Council intends to extend the Central Shopping Area to include the Westgate quarter and allocate sites for retail development within it. This will enable the delivery in the region of 15,000 sqm net of additional floorspace to diversify and improve the retail offer. Further allocations will be made through the Site Allocations DPD review following a review of the Retail capacity study to address provision after 2026.		Through the IP-One Area Action Plan, the Council will extend the Central Shopping Area to include the Westgate quarter and the land south of Crown Street and Old Foundry Road and allocate sites for retail development within it. This will enable the delivery of at least 35,000 sqm net of additional floorspace to diversify and improve the retail offer.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
SPAs and SACs		developed land will be used. The policy will contribute to the SA objective if possible contamination is remediated with indirect positive effects on water quality and soil resources. However, on the whole the effect is considered to be negligible in the long term.		remediated with indirect positive effects on water quality and soil resources. However, on the whole the effect is considered to be negligible in the long term. .
ET9 To conserve and enhance the historic environment, heritage assets and their settings	<b>+/-</b> <b>S,M -LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The majority of heritage assets (e.g. listed buildings) are located in the town centre of Ipswich and these are likely to be negatively affected by additional retail site allocations. Schemes to make vacant premises look more visually attractive may have both positive and negative effects dependent on the selected design.  <i>It would be beneficial to ensure that retail expansion will be encouraged without compromising the settings of any designated heritage assets. Settings of listed buildings could be improved through appropriate design that would complement surrounding retail buildings.</i>	<b>+/-</b> <b>S,M -LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the preferred option.
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	<b>+S,M -LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	Extension of the Central Shopping Area into the currently part disused Westgate area will have a direct townscape benefit.	<b>+S,M -LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the preferred option.
HW1 To improve the health of those most in need	<b>0</b> <b>S, M -LT</b> <b>D</b> <b>R</b> <b>M</b>	Whilst improvement of health is important, the focus of the policies relates mainly to promotion of retail developments. As such no significant effects have been identified.	<b>0</b> <b>S, M -LT</b> <b>D</b> <b>R</b> <b>M</b>	Whilst improvement of health is important, the focus of the policies relates mainly to promotion of retail developments. As such no significant effects have been identified.
HW2 To improve the quality of life where people live and encourage community participation	<b>+</b> <b>M -LT</b> <b>D/I</b> <b>R</b> <b>M</b>	Although the land south of Crown street and Old Foundry Road is excluded from the revised policy, on the whole, the policy will contribute to the achievement of the SA objective through providing more choice for residents to access facilities located within a walking distance from their homes.	<b>+</b> <b>M -LT</b> <b>D/I</b> <b>R</b> <b>M</b>	The policy will contribute to the achievement of the SA objective through providing more choice for residents to access facilities located within a walking distance from their homes.
ER1 To reduce poverty and social exclusion	<b>+</b> <b>M -LT</b> <b>D/I</b> <b>R</b> <b>M</b>	Same as above. In addition, creating jobs in retail will help reducing poverty through additional job opportunities.	<b>+</b> <b>M -LT</b> <b>D/I</b> <b>R</b> <b>M</b>	The implementation of the alternative is likely to result in the same effects as those identified for the preferred option.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	<b>++</b> <b>M -LT</b> <b>D/I</b> <b>R</b> <b>M</b>	Although the figure for additional floorspace has been significantly reduced to 15,000sqm, in the medium and long-term the policy will contribute to the achievement of the SA objective through additional retail site allocations and encouraging further investment and development in Ipswich Central Shopping Area.	<b>++</b> <b>S, M</b> <b>I/D</b> <b>R</b> <b>M</b>	More employment opportunities are likely to be created with the additional floorspace being allocated for retail uses. Therefore it is considered that the policy will strongly support the SA objective.
ER3 To help meet the housing requirements for the whole community	<b>0</b> <b>S, M -LT</b> <b>D</b> <b>R</b> <b>M</b>	The housing provision is not a primary function of this policy.	<b>0</b> <b>S, M -LT</b> <b>D</b> <b>R</b> <b>M</b>	The housing provision is not a primary function of this policy.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	<b>+</b> <b>M -LT</b> <b>D/I</b> <b>R</b> <b>M</b>	The figure for additional net retail floorspace has been significantly reduced to 15,000sqm to reflect the needs and ensure that retail growth is promoted in a sustainable manner. The retail site allocations will contribute to further investment in the town centre and key district centres and contribute to overall economic growth throughout the plan area.	<b>+/-</b> <b>S, M -LT</b> <b>D</b> <b>R</b> <b>M</b>	Although the additional allocation of floorspace suggests economic growth due to more employment opportunities and inward investment, evidence shows that further extension of the retail area to the east may result in oversupply of retail units and therefore not necessarily be sustainable in the long term. Therefore it is considered that the effects from the implementation of the policy are likely to be both positive and negative.
ER5 To support vital and viable town, district and local centres	<b>++</b> <b>S, M -LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	The policy strongly supports the SA objective and recognises the importance of increasing the vitality of key district centres.	<b>++</b> <b>S, M -LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the preferred option.
ER6 To encourage efficient patterns of movement in support of	<b>+</b> <b>M -LT</b> <b>D/I</b>	Efficient patterns of movement will be encouraged through the allocation of retail sites in areas that are easily accessible by foot and public transport (in central	<b>+</b> <b>M -LT</b> <b>D/I</b>	Efficient patterns of movement will be encouraged through the allocation of retail sites in areas that are easily accessible by foot and public transport (in central Ipswich).

	<b>CS14: Retail development</b>		<b>Alternative 1: Adopted Policy 2011</b>	
	Through the Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD, the Council intends to extend the Central Shopping Area to include the Westgate quarter and allocate sites for retail development within it. This will enable the delivery in the region of 15,000 sqm net of additional floorspace to diversify and improve the retail offer. Further allocations will be made through the Site Allocations DPD review following a review of the Retail capacity study to address provision after 2026.		Through the IP-One Area Action Plan, the Council will extend the Central Shopping Area to include the Westgate quarter and the land south of Crown Street and Old Foundry Road and allocate sites for retail development within it. This will enable the delivery of at least 35,000 sqm net of additional floorspace to diversify and improve the retail offer.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
economic growth	<b>R M</b>	Ipswich).	<b>R M C</b>	
ER7 To encourage and accommodate both indigenous and inward investment	<b>+ M –LT D/I R M</b>	Same as ER4.	<b>+/- S, M –LT D R M</b>	Although the additional allocation of floorspace suggests economic growth due to more employment opportunities and inward investment, evidence shows that further extension of the retail area to the east may result in oversupply of retail units and therefore not necessarily be sustainable in the long term. Therefore it is considered that the effects from the implementation of the policy are likely to be both positive and negative.
CL1 To maintain and improve access to education and skills for both young people and adults	<b>0 S, M –LT D R M</b>	There is no clear relationship between the policy and the SA objective.	<b>0 S, M –LT D R M</b>	There is no clear relationship between the policy and the SA objective.
CD1 To minimise potential opportunities for crime and anti-social activity	<b>0 S, M –LT D R M</b>	There is no clear relationship between the policy and the SA objective.	<b>0 S, M –LT D R M</b>	There is no clear relationship between the policy and the SA objective.

Table 5 Sustainability appraisal of CS17 and Alternative 1

	<b>CS17: Delivering Infrastructure</b>		<b>Alternative 1: Adopted Policy 2011</b>	
	The revised policy will allow flexibility on the spending for strategic infrastructure projects throughout the whole borough of Ipswich rather than just within new developments.		The existing system in Ipswich is that of planning obligations, which cover on- and off-site requirements including affordable housing, open space provision, transport measures, and education provision. IBC adopted a standard charge approach to the delivery of infrastructure. Each development will be expected to meet site related infrastructure needs outside the standard charge approach. Affordable housing and on-site open space provision will continue to be dealt with through planning obligations.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
ET1 To improve air quality	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	Adequate infrastructure within new developments may result in relief of congestion at key routes of the borough. Section 106 agreements and the Community Infrastructure Levy (CIL) will help address road capacity and congestion issues off- site and thus result in improved air quality in the long term. The preferred option performs better against the SA objective because infrastructure improvements will be possible off-site as well as on-site where need is identified. This will provide more flexibility to address congestion issues in areas which already have shown deterioration of air quality. In addition, where appropriate developer contributions may be allocated for the creation of new cycle routes across the borough and not only within new development.	<b>+</b> <b>S, M –LT</b> <b>D/I</b> <b>R</b> <b>M</b>	In sustainable terms, retaining a S106 Agreement approach will result in similar effects as the revised policy as the necessary infrastructure will be delivered through planning obligations secured through a Section 106 Agreements. However, alternative 1 provides less flexibility to address more strategic infrastructure improvements and to mitigate any negative effects of the development on the existing community and environment.
ET2 To conserve soil resources and quality	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	There is no clear relationship between the policy and the SA objective.	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	There is no clear relationship between the policy and the SA objective.
ET3 To reduce waste	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The primary focus of the policy is not to reduce waste. Although the revised policy clearly ensures that waste management infrastructure will be delivered using the pool of developer contributions, no specific measures are foreseen to reduce waste.	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The primary focus of the policy is not to reduce waste. Although the alternative clearly ensures that waste management infrastructure will be delivered no specific measures are foreseen to reduce waste.
ET4 To reduce the effects of traffic upon the environment	<b>+</b> <b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The policy will contribute to the achievement of the SA objective through the provision of adequate infrastructure within new developments and subsequent relief of congestion at key routes of the borough. In addition, the CIL will help address road capacity and congestion issues off- site. The preferred option allows more flexibility to allocate contributions for strategic infrastructure improvements. Therefore, it is considered to be more beneficial as it will cover the whole borough.	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	Alternative 1 will contribute to the achievement of the SA objective through the provision of adequate infrastructure within new developments and subsequent relief of congestion at key routes of the borough.
ET5 To improve access to key services for all sectors of the population	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The policy will contribute to the achievement of the SA objective through Section 106 Agreements and CIL ensuring developers contributions for transport infrastructure at strategic level. The revised policy would allow development and improvements of infrastructure according to the needs identified for all the residents rather than focusing on new development.	<b>+</b> <b>M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the preferred option.
ET6 To limit and adapt to climate change	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The preferred option will contribute to the achievement of the SA objective through delivery of Ipswich Flood Defences infrastructure which will alleviate flood risk in the areas adjacent to the river Orwell.	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	Alternative 1 would result in the same effects on the SA Objective as the revised policy through delivery of Ipswich Flood Defences infrastructure which will alleviate flood risk in the areas adjacent to the river Orwell.
ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	Same as above.	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	Same as above.
ET8 To conserve and enhance biodiversity and geodiversity , including favourable conditions on SSSIs, SPAs and SACs	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	Strategic green infrastructure alongside with town centre environmental enhancements will be financed through CIL. Therefore it is considered that the policy will have a positive effect on biodiversity and geodiversity in the borough.	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	Strategic green infrastructure alongside with town centre environmental enhancements will be financed through a standard charge. Therefore it is considered that the policy will have similar positive effects on biodiversity and geodiversity as the revised policy.
ET9 To conserve and enhance the historic environment, heritage assets and their	<b>+</b> <b>S,M –LT</b> <b>D</b> <b>R</b>	The policy may contribute to the achievement of the SA objective through allocation of funds to enhance settings of heritage assets in the borough.	<b>+</b> <b>S,M –LT</b> <b>D</b> <b>R</b>	The implementation of the alternative is likely to result in the same effects as those identified for the revised policy.

	<b>CS17: Delivering Infrastructure</b>		<b>Alternative 1: Adopted Policy 2011</b>	
	The revised policy will allow flexibility on the spending for strategic infrastructure projects throughout the whole borough of Ipswich rather than just within new developments.		The existing system in Ipswich is that of planning obligations, which cover on- and off-site requirements including affordable housing, open space provision, transport measures, and education provision. IBC adopted a standard charge approach to the delivery of infrastructure. Each development will be expected to meet site related infrastructure needs outside the standard charge approach. Affordable housing and on-site open space provision will continue to be dealt with through planning obligations.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
settings	<b>M</b> <b>C</b>		<b>M</b> <b>C</b>	
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	<b>+</b> <b>LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	The policy is likely to contribute to the achievement of the SA objective through allocation of funds to invest into public realm enhancement measures .	<b>+</b> <b>LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the revised policy.
HW1 To improve the health of those most in need	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	Sport and leisure facilities will be delivered through the implementation of this policy. In addition, developers' contributions will be used for the new country park and community facilities including GP surgeries and health centres. It is therefore considered that health issues will be addressed with the implementation of this policy.	<b>+</b> <b>LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the revised policy.
HW2 To improve the quality of life where people live and encourage community participation	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	On the whole the quality of life will be improved though the provision of key infrastructure facilities e.g. schools, flood defences, etc. Community participation will be encouraged with the creation of a country park and sport and leisure facilities serving the whole borough.	<b>+</b> <b>LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the revised policy.
ER1 To reduce poverty and social exclusion	<b>+</b> <b>S, M –LT</b> <b>I</b> <b>R</b> <b>M</b> <b>C</b>	Improved infrastructure will improve the overall quality of life in the borough and attract inward investment. For these reasons it is considered that the policy will have a positive effect on the standard of life and will contribute indirectly to the achievement of the SA objective.	<b>+</b> <b>S, M –LT</b> <b>I</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the revised policy.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	The primary focus of the policy is not to address employment issues. Although some job opportunities will be created through local infrastructure projects, it is anticipated that overall effect on employment figures will be negligible.	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	The implementation of the alternative is likely to result in the same effects as those identified for the revised policy.
ER3 To help meet the housing requirements for the whole community	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	The housing provision is not a primary function of this policy.	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	The housing provision is not a primary function of this policy.
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	<b>+</b> <b>M –LT</b> <b>D/I</b> <b>R</b> <b>M</b>	See the notes for HW2 and ER1.	<b>+</b> <b>M –LT</b> <b>D/I</b> <b>R</b> <b>M</b>	See the notes for HW2 and ER1.
ER5 To support vital and viable town, district and local centres	<b>+</b> <b>S, M –LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	Positive effects are likely to occur through the provision of public transport facilities, the provision of community facilities in centres and community safety initiatives in the Town centre funded through CIL.	<b>+</b> <b>S, M –LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the revised policy.
ER6 To encourage efficient patterns of movement in support of economic growth	<b>+</b> <b>S, M –LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	The SA objective will be achieved through the Ipswich Major Scheme 'Travel Ipswich' and accessibility improvements between the Central Shopping Area, Waterfront, and railway station.	<b>+</b> <b>S, M –LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	The policy will contribute to the achievement of the SA objective through sustainable transport measures e.g. additional park and ride, the Ipswich Major Scheme and accessibility improvements between the Central Shopping Area, Waterfront and railway station as well as measures to increase east-west capacity in the transport system to ease congestion.
ER7 To encourage and accommodate both indigenous and inward investment	<b>+</b> <b>S, M –LT</b> <b>I</b> <b>R</b> <b>M</b> <b>C</b>	Improved infrastructure will improve the overall quality of life in the borough and attract inward investment. For these reasons it is considered that the policy will have a positive effect on the standard of life and will contribute indirectly to the achievement of the SA objective.	<b>+</b> <b>S, M –LT</b> <b>I</b> <b>R</b> <b>M</b> <b>C</b>	The implementation of the alternative is likely to result in the same effects as those identified for the revised policy.
CL1 To maintain and improve access to education and skills for both young people and adults	<b>?</b> <b>S</b> <b>D/I</b> <b>R</b> <b>L</b> <b>C</b>	Although the implementation of the policy has the potential to improve educational attainment through the strategic provision of new schools, it is uncertain whether the overall educational attainment will be improved significantly as other factors also influence the level of skills and qualifications.	<b>?</b> <b>S</b> <b>D/I</b> <b>R</b> <b>L</b> <b>C</b>	Although the implementation of the policy has the potential to improve educational attainment through the provision of new schools, it is uncertain whether the overall educational attainment will be improved significantly as other factors also influence the level of skills and qualifications.
CD1 To minimise potential opportunities for crime and anti-social	<b>0</b> <b>S, M –LT</b> <b>D</b>	There is no clear relationship between the policy and the SA objective.	<b>0</b> <b>S, M –LT</b> <b>D</b>	There is no clear relationship between the policy and the SA objective.

	<b>CS17: Delivering Infrastructure</b>		<b>Alternative 1: Adopted Policy 2011</b>	
	The revised policy will allow flexibility on the spending for strategic infrastructure projects throughout the whole borough of Ipswich rather than just within new developments.		The existing system in Ipswich is that of planning obligations, which cover on- and off-site requirements including affordable housing, open space provision, transport measures, and education provision. IBC adopted a standard charge approach to the delivery of infrastructure. Each development will be expected to meet site related infrastructure needs outside the standard charge approach. Affordable housing and on-site open space provision will continue to be dealt with through planning obligations.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment <i>Mitigation / Enhancement Measures</i></b>	<b>Impact</b>	<b>Comment <i>Mitigation / Enhancement Measures</i></b>
activity	<b>R M</b>	It could help to fund police facilities or community safety measures.	<b>R M</b>	

Appendix F

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## Sustainability Appraisal of Revised Policies

The tables below provide an explanation of the notation used in the options assessment matrix.

Major Positive Impact	The policy strongly supports the achievement of the SA Objective.	<b>++</b>
Positive Impact	The policy partially supports the achievement of the SA Objective.	<b>+</b>
Neutral/ No Impact	There is no clear relationship between the policy and / or the achievement of the SA Objective or the relationship is negligible.	<b>0</b>
Positive and negative outcomes	The option has a combination of both positive and negative contributions to the achievement of the SA Objective, e.g. a short term negative impact but a longer term positive impact.	<b>+/-</b>
Uncertain outcome	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation at the local level. More information is required to assess the impacts.	<b>?</b>
Negative Impact	The policy partially detracts from the achievement of the SA Objective.	<b>-</b>
Major Negative Impact	The policy strongly detracts from the achievement of the SA Objective.	<b>--</b>

<b>L-T</b>	Effects likely to arise in 10-25 years of Core Strategy implementation
<b>M-T</b>	Effects likely to arise in 5-10 years of Core Strategy implementation
<b>S-T</b>	Effects likely to arise in 0-5 years of Core Strategy implementation
<b>D</b>	Direct effects.
<b>I</b>	Indirect effects.
<b>R</b>	Effects are reversible
<b>IR</b>	Effects are irreversible
<b>H/M/L</b>	High, medium or low certainty of prediction
<b>C</b>	Potential to have cumulative effect with other proposals or plans on this objective

Table: Core Strategy Focused Review Revised Policies

	<b>CS7: The Amount of Housing Required</b>		<b>CS10: Ipswich Northern Fringe</b>		<b>CS13: Planning for Jobs Growth</b>		<b>CS14: Retail Development</b>		<b>CS17: Delivering Infrastructure</b>	
	The Council has an objectively assessed housing need of 13,550 dwellings at 677 dwellings per annum between 2011 and 2031. Proposes 360 fewer residential units than considered originally in the adopted Core Strategy 2011 between 2011 and 2027. The revised policy proposes 2,710 dwellings between 2027 and 2031 beyond the adopted Core Strategy plan period, which would be 2,800 dwellings if the adopted policy was rolled forward to 2031.		The revised policy envisages the development of the whole Northern Fringe to meet the housing needs assessed in the 2012 SHMA. Originally only 1000 new dwellings were expected to be delivered by 2021; the revised policy is now looking at 3,500 new dwellings for the overall period until 2031.		The Council will promote sustainable economic growth in the Ipswich Policy Area, with a focus on the delivery of jobs within the Borough. It will encourage the provision of 12,500 jobs between 2011 and 2031.		Less retail floorspace: previously 35,000sqm, the revised policy is looking at 15,000sqm of additional floorspace allowing flexibility to amend the figure following a review of the Retail Capacity Study after 2026.		The revised policy will allow flexibility on the spending for infrastructure projects throughout the whole territory of Ipswich rather than just within new developments.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
ET1 To improve air quality	- <b>S, M –LT D R M C</b>	Currently there are four AQMA all located in urban Ipswich. Since road traffic is the main source of air pollution it is anticipated that the population growth and the influx of new residents will result in an increased level of traffic in the areas of the new developments and on the main roads that lead to the town centre and/or to the main employment hubs. The overall number of projected growth of housing numbers suggests significant increase in traffic and negative effects on air quality.  <i>Although the use of sustainable modes of transport is encouraged through other policies in the Core Strategy (e.g. DM16), opportunities should be sought to allocate land in a way that the new residential units are near community facilities/employment hubs. See Policy CS2.</i>	- <b>S, M –LT D/I R M C</b>	Air quality may deteriorate as a result of the envisaged urban extension to the north of the town centre. Although measures to encourage the use of sustainable modes of transport are included in the Core Strategy, travel by private car could remain the main mode of transport to work due to there being no employment land allocated on the site. The indicative number of dwellings is 3,500; hence it is anticipated that negative effects on air quality are likely to occur in the north part of the borough.  <i>Increase in public transport provision (buses) and more frequent train services to the area may reduce car use.</i>	+/- <b>S, M –LT I R L C</b>	Whilst the primary focus of the policy is not to tackle air quality issues, it is considered that the appropriate allocation of employment land may result in improvement of air quality if it is easily accessible by sustainable modes of transport. The policy focuses on the delivery of jobs within the borough which may reduce longer commuting trips outside the borough. The former Crane's site is a strategic employment site with good public transport accessibility. Therefore it is anticipated that in the long term there will be some indirect positive effects on air quality but the level of certainty of prediction is rather low.	- <b>S, M –LT D R M C</b>	The revised policy envisages retail floorspace to be allocated in the Central Shopping Area which is largely pedestrianized and accessible by bicycle. Additionally the town centre is well served by public transport which may reduce the need to travel by private car. However, additional retail floorspace may result in increase of trips to the shopping areas by residents within the borough and from neighbouring areas. As a result, traffic is likely to increase on the main approach roads to and from Ipswich causing deterioration of air quality.  <i>Park and ride facilities in the peripheral areas of the borough may encourage people to use sustainable modes of transport to the main shopping area in the town centre.</i>	+ <b>S, M –LT D R M</b>	Whilst the primary focus of the policy is not addressing air quality issues, it is considered that adequate infrastructure within new developments may result in relief of congestion at key routes of the borough. In addition, the Community Infrastructure Levy (CIL) will help address road capacity and congestion issues off-site and thus result in improved air quality in the long term.
ET2 To conserve soil resources and quality	- - <b>S, M –LT D I R L C</b>	Although the number of the residential dwellings to be built has decreased, the envisaged housing growth suggests that good quality agricultural land may be lost as a result of substantial urban extension.  It is recognised that limitations exist and will increase throughout	- <b>S, M –LT D I R M C</b>	The site consists of 195ha of good quality agricultural land; 1/3 of the land will be allocated for open space and a country park, which will partially contribute to the achievement of the SA objective but <i>opportunities may be sought to allocate land for allotments to make use of the good quality</i>	+ <b>S, M –LT D R M C</b>	The policy focuses primarily on the allocation of land for employment use; much of it is previously developed land (former Crane's factory). The former Crane's site is an example of a contaminated land which has been redeveloped successfully for its current use and <i>more opportunities should be</i>	+ <b>S, M –LT D R M</b>	The policy focuses primarily on the allocation of land for retail use on previously developed land at Westgate.	<b>O</b> <b>S, M –LT D R M</b>	There is no clear relationship between the policy and the SA objective.

	<b>CS7: The Amount of Housing Required</b>		<b>CS10: Ipswich Northern Fringe</b>		<b>CS13: Planning for Jobs Growth</b>		<b>CS14: Retail Development</b>		<b>CS17: Delivering Infrastructure</b>	
	The Council has an objectively assessed housing need of 13,550 dwellings at 677 dwellings per annum between 2011 and 2031. Proposes 360 fewer residential units than considered originally in the adopted Core Strategy 2011 between 2011 and 2027. The revised policy proposes 2,710 dwellings between 2027 and 2031 beyond the adopted Core Strategy plan period, which would be 2,800 dwellings if the adopted policy was rolled forward to 2031.		The revised policy envisages the development of the whole Northern Fringe to meet the housing needs assessed in the 2012 SHMA. Originally only 1000 new dwellings were expected to be delivered by 2021; the revised policy is now looking at 3,500 new dwellings for the overall period until 2031.		The Council will promote sustainable economic growth in the Ipswich Policy Area, with a focus on the delivery of jobs within the Borough. It will encourage the provision of 12,500 jobs between 2011 and 2031.		Less retail floorspace: previously 35,000sqm, the revised policy is looking at 15,000sqm of additional floorspace allowing flexibility to amend the figure following a review of the Retail Capacity Study after 2026.		The revised policy will allow flexibility on the spending for infrastructure projects throughout the whole territory of Ipswich rather than just within new developments.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
		the plan period to deliver housing on previously developed land. At present only 52.5% of housing delivery 2013-2031 will be on brownfield land which may result in negative effects on soil resources in the Borough (undeveloped areas currently lie within areas of Grade II Agricultural Land). In order to reach the housing targets, further land will need to be allocated. As a result, potential negative effects will be associated with potential loss of greenfield land. <i>Approximately 30ha of vacant buildings could be reused.</i>		<i>agricultural land.</i>		<i>sought to remediate other potential employment sites.</i>				
ET3 To reduce waste	<b>-</b> <b>S, M –LT</b> <b>D/I</b> <b>IR</b> <b>M</b>	It is anticipated that the target to deliver at least 13,550 additional residential dwellings in the borough will generate waste from construction as well as household waste from the growing numbers of new residents. Policy CS4 focuses specifically on encouraging the minimisation of waste from new developments and reuse/recycling of materials. <i>Opportunities should be sought to encourage recycling within the new housing developments.</i> <i>Facilities should be provided to encourage reuse/recycling.</i>	<b>-</b> <b>S, M –LT</b> <b>D/I</b> <b>IR</b> <b>M</b>	Development at the Northern Fringe will lead to the generation of waste. There are a number of waste facilities that currently serve the area. With the provision of a new waste incinerator, it is anticipated that the waste facilities will meet the demand posed by the growing number of homes. <i>Opportunities should be sought to increase the percentage of reused or recycled household waste. Key waste materials during the construction of new housing should also be reused/recycled.</i>	<b>-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The revised policy would potentially result in land allocated for employment use due to commitment to provide jobs. Waste is likely to be generated during operation of employment sites, if appropriate mitigation measures are not in place. <i>Opportunities should be sought to encourage recycling within the new employment hubs.</i>	<b>-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	Some positive effects will occur if the vacant premises in the town centre are brought back into active use as stated in the policy. However, more waste is likely to be generated from the delivery of more retail floorspace and the operation activities of the new retail developments. Cumulatively, together with the housing and employment led policies, waste generation may have a significant negative effect on the environmental objectives in the long term if mitigation measures are not in place.  <i>Reuse/recycling should be</i>	<b>O</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The primary focus of the policy is not to reduce waste. However, waste management infrastructure will be delivered using the pooled developer contributions.

	<b>CS7: The Amount of Housing Required</b>		<b>CS10: Ipswich Northern Fringe</b>		<b>CS13: Planning for Jobs Growth</b>		<b>CS14: Retail Development</b>		<b>CS17: Delivering Infrastructure</b>	
	The Council has an objectively assessed housing need of 13,550 dwellings at 677 dwellings per annum between 2011 and 2031. Proposes 360 fewer residential units than considered originally in the adopted Core Strategy 2011 between 2011 and 2027. The revised policy proposes 2,710 dwellings between 2027 and 2031 beyond the adopted Core Strategy plan period, which would be 2,800 dwellings if the adopted policy was rolled forward to 2031.		The revised policy envisages the development of the whole Northern Fringe to meet the housing needs assessed in the 2012 SHMA. Originally only 1000 new dwellings were expected to be delivered by 2021; the revised policy is now looking at 3,500 new dwellings for the overall period until 2031.		The Council will promote sustainable economic growth in the Ipswich Policy Area, with a focus on the delivery of jobs within the Borough. It will encourage the provision of 12,500 jobs between 2011 and 2031.		Less retail floorspace: previously 35,000sqm, the revised policy is looking at 15,000sqm of additional floorspace allowing flexibility to amend the figure following a review of the Retail Capacity Study after 2026.		The revised policy will allow flexibility on the spending for infrastructure projects throughout the whole territory of Ipswich rather than just within new developments.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
								<i>encouraged.</i>		
ET4 To reduce the effects of traffic upon the environment	<b>-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	Whilst the focus of the policy is to not tackle traffic issues, the significant amount of new residential dwellings has the potential to result in pressure on key junctions/roads (on the A12/A14 at Copdock, Seven Hills Interchange and the Orwell Bridge) in peak hours depending on the exact location of development and the provision of appropriate level of public transport to serve the new neighbourhoods.  <i>Mitigation measures to encourage sustainable modes of transport are included in other policies of the Core Strategy DM15, DM16, and DM17.</i>	<b>-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	Same as CS7.	<b>+/-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The policy will contribute to the achievement of the SA objective through the allocation of land for employment at sites that have good public transport accessibility (e.g. former Crane's factory).	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>L</b> <b>C</b>	The policy will contribute to the achievement of the SA objective through additional retail site allocations in the Central Shopping Area and key district centres within walking distance from residential areas and well served by public transport.	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The policy will contribute to the achievement of the SA objective through the provision of adequate infrastructure within new developments and subsequent relief of congestion at key routes of the borough. In addition, the CIL will help address road capacity and congestion issues off- site. The revised policy allows more flexibility to allocate contributions for strategic infrastructure improvements. Therefore, it is considered to be more beneficial as it will cover the territory of the whole borough.
ET5 To improve access to key services for all sectors of the population	<b>+/-</b> <b>M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	Whilst the primary focus of the policy is not to tackle access issues, it is anticipated that significant amount of housing will be delivered within the borough, including at the Northern Fringe. Access issues may occur due to congestion on the roads that connect the NF with Ipswich town centre.  However, CS10 ensures that the access to services in the Northern Fringe will be improved including new transport routes and services. Where housing is delivered within	<b>+</b> <b>M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The policy will contribute to the achievement of the SA objective through ensuring that any development in the Northern Fringe includes green walking and cycling links to Westerfield station and the town centre which will benefit existing residents also.  Significant infrastructure will be put in place to meet the needs of the new neighbourhoods including public transport routes and services and community facilities – again also accessible to existing residents nearby.	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	There is no clear relationship between the policy and / or the achievement of the SA Objective or the relationship is negligible.	<b>+</b> <b>M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The SA objective will be achieved through the enhancement of facilities available in district centres and providing more choice for local residents within walking distance of their homes.	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The policy will contribute to the achievement of the SA objective through Section 106 Agreements and CIL ensuring developers contributions for transport infrastructure at strategic level. The revised policy would allow development and improvements of infrastructure according to the needs identified for all the residents rather than focusing only on new developments.

	<b>CS7: The Amount of Housing Required</b>		<b>CS10: Ipswich Northern Fringe</b>		<b>CS13: Planning for Jobs Growth</b>		<b>CS14: Retail Development</b>		<b>CS17: Delivering Infrastructure</b>	
	The Council has an objectively assessed housing need of 13,550 dwellings at 677 dwellings per annum between 2011 and 2031. Proposes 360 fewer residential units than considered originally in the adopted Core Strategy 2011 between 2011 and 2027. The revised policy proposes 2,710 dwellings between 2027 and 2031 beyond the adopted Core Strategy plan period, which would be 2,800 dwellings if the adopted policy was rolled forward to 2031.		The revised policy envisages the development of the whole Northern Fringe to meet the housing needs assessed in the 2012 SHMA. Originally only 1000 new dwellings were expected to be delivered by 2021; the revised policy is now looking at 3,500 new dwellings for the overall period until 2031.		The Council will promote sustainable economic growth in the Ipswich Policy Area, with a focus on the delivery of jobs within the Borough. It will encourage the provision of 12,500 jobs between 2011 and 2031.		Less retail floorspace: previously 35,000sqm, the revised policy is looking at 15,000sqm of additional floorspace allowing flexibility to amend the figure following a review of the Retail Capacity Study after 2026.		The revised policy will allow flexibility on the spending for infrastructure projects throughout the whole territory of Ipswich rather than just within new developments.	
<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
		IP-One area, it is anticipated that it will contribute to the achievement of the SA objective as the key services are easily accessible by all modes of transport.		CS10 ensures that the access to services in the Northern Fringe will <i>be improved including new transport routes and services. In addition, some key services will be provided locally to meet the demands of the new residents.</i>						
ET6 To limit and adapt to climate change	<b>-</b> <b>S, M –LT</b> <b>I</b> <b>R</b> <b>M</b>	Although the number of residential dwellings has decreased, the policy envisages the use of greenfield land due to limited amount of brownfield sites. Consequently, there is potential for increased flood risk due to change in land use. Changes in land use may affect the generation of water run-off at local scale. Additionally, new homes will use more energy which will result in increase of greenhouse emissions.  <i>Therefore, it will be beneficial to use SuDS to reduce flood risk and manage run-off as required by Core Strategy Policy DM4. Greenhouse emissions could be reduced through requirement for new developments to incorporate Code for Sustainable Homes standards as required by Core Strategy Policy DM1.</i>	<b>-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The policy envisages the use of greenfield land due to limited amount of brownfield sites in the borough. Changes in land use may affect the generation of water run-off at local scale. Additionally, new homes will use more energy which will result in increase of greenhouse emissions.  <i>Therefore, it will be beneficial to use SuDS to reduce flood risk and manage run-off. Greenhouse emissions could be reduced through the requirement for new developments to incorporate Code for Sustainable Homes and BREAAAM standards. See Core Strategy policies DM4 and DM1.</i>	<b>+/-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>L</b>	Allocating land for employment generating uses in central urban areas well served by public transport may reduce the need to travel by private car. In addition allocating land for employment use near existing employment hubs (e.g. IP051) may encourage car-share schemes. New employment sites will however use energy and cumulatively will detract from the SA objectives unless mitigation measures are in place. For these reasons, it is considered that effects will be both positive and negative.  <i>Greenhouse emissions could be reduced through requirement for new business buildings to incorporate BREAAAM standards. See Core Strategy Policy DM1.</i>	<b>+</b> <b>LT</b> <b>D</b> <b>R</b> <b>L</b> <b>C</b>	The policy on its own will have negligible effect on climate change, but cumulatively allocating retail sites in locations with pedestrian and cycle access and promoting public transport services may result in less use of private cars as the main transport mode.	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The Environment Agency has identified a risk of flooding on land adjacent to the River Orwell, the River Gipping, Belstead Brook and the small watercourse located within the northern part of the Northern Fringe. The policy will contribute to the achievement of the SA objective through delivery of Ipswich Flood Defences infrastructure.
ET7 To protect and enhance the quality of water features	<b>+/-</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	There are areas within the borough boundary that are prone to flooding, particularly those near the Waterfront. Therefore	<b>-</b> <b>S, M –LT</b> <b>D</b> <b>R</b>	The Northern Fringe site lies partially over a Zone 2 (outer zone) groundwater Source Protection Zone and partially over	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	The main areas of employment are not located in or near Flood zone 2 and 3 and the majority of allocations are on brownfield land. In addition,	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	The policy promotes extension of the Central Shopping area to include Westgate Quarter which is not located in Flood zone 2 or 3.	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	Same as above.

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<b>SA Objectives</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>	<b>Impact</b>	<b>Comment Mitigation / Enhancement Measures</b>
and resources and reduce the risk of flooding	<b>C</b>	<i>development should be directed to areas of lower flood risk through the Sequential Test process and highly vulnerable development should not be permitted unless no alternative sites are available. In addition, the construction of new developments should ensure that the quality of watercourses does not deteriorate through the use of SuDS – see Core Strategy policy DM4. Positive effects on water quality may occur where contaminated land is remediated before commencement of construction works.</i>	<b>M C</b>	Secondary A (bedrock and superficial deposits) aquifers. The use of greenfield land for residential use will result in loss of infiltration and could increase flood risk in the area. Therefore new developments should be encouraged to use SuDS to manage runoff, reduce further flood risk and protect water quality (see Policy DM4).		there no strategic site allocations for employment use near the main water features and none of the growth sectors suggest heavy industrial pollution which reduces significantly the risk of water quality deterioration during construction and operation. Therefore it is considered that the overall effect from the implementation of the policy will be neutral.		Therefore it is considered that the effect will be neutral.	<b>C</b>	
ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	<b>+/- S, M –LT D R M C</b>	Ipswich contains a number of sites of international, national, regional and local importance for nature conservation. Policy CS7 identifies the Northern Fringe as a potential area of new development but that is not considered to pose any environmental risks upon the designated sites located in the southern part of the borough. However, net biodiversity loss is anticipated with regards to loss of greenfield land. <i>Opportunities should be sought to enhance the habitats where new development will occur (see policies CS4, DM5 and DM31).</i>	<b>+/- S, M –LT D R M C</b>	On the whole, the implementation of the policy will result in loss of open countryside and good quality farm land which will have indirect negative effect on biodiversity and potentially affect protected species using the land. Positive effects are likely to occur through green infrastructure and the allocation of land for County Park. Designated sites are located at a significant distance from the Northern Fringe area and are unlikely to be affected by new development. <i>Opportunities should be sought to create/enhance the habitats where new developments will occur.</i>	<b>+/- M –LT I R M C</b>	The majority of employment land and strategic employment sites are allocated at a significant distance from designated sites for nature conservation. The sites located near the River Orwell (e.g. IP067) will require <i>further project level assessments to ensure that mitigation measures are applied for potential significant negative effects.</i> The land for employment will be allocated through the Site Allocations and Policies DPD and it is anticipated that previously developed land will be used where possible. The policy will contribute to the SA objective if possible contamination is remediated with indirect positive effects on water quality and soil resources. Therefore, the effect is considered	<b>O M –LT I R M C</b>	The Westgate area and local and district centres are located at a significant distance from designated sites for nature conservation and occupy previously developed land. Therefore the effect is considered to be neutral.	<b>+ S, M –LT D R M C</b>	Strategic green infrastructure alongside with town centre environmental enhancements will be financed through CIL. Therefore it is considered that the policy will have a positive effect on biodiversity and geodiversity in the borough.

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						to be beneficial in the long term.				
ET9 To conserve and enhance the historic environment, heritage assets and their settings	<b>-</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	There are a great number of designated heritage assets (e.g. listed buildings) within the borough boundary and the majority of them are concentrated in the town centre. Negative effects may occur where new developments are located near designated heritage assets. <i>If any new development/windfall sites are located in close proximity to designated heritage assets, opportunities should be sought to enhance the condition of existing assets, particularly the ones 'at risk'. (See Policy CS4)</i>	<b>-</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	There are a number of Listed Buildings within the vicinity of the Northern Fringe area: Sparrowe's Nest and Farm (several structures, Grade II) is adjacent to a proposed development block, though protected by screen planting. Other buildings such as Cranfield Court to the southeast (Grade II) are set within existing residential areas.  Red House Farm is locally listed and set within the site area. The 19th Century farm and outbuildings as well as the farm garden and woodland to the north of the site will be directly affected by the redevelopment of the area, both through the impact of adjacent development and the potential adaptation of the farm buildings and open land.  <i>New development should ensure that the heritage assets located within the Northern Fringe area and near its boundary are not adversely affected, through appropriate design, in particular in terms of scale, height, massing, and alignment of new development. In addition, the setting of listed buildings could be conserved through the use of traditional or sympathetic building materials and techniques. Any</i>	<b>-</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The location of strategic employment sites does not suggest any significant negative effects on areas/sites of historical importance. Sites allocated for employment/retail use within the IP-one area (e.g. IP035, IP051, etc.) may affect designated heritage assets as there is a concentration of great number of listed building in the town centre.  <i>Where new development is located near listed buildings mitigation measures should be implemented to avoid any significant negative effects through appropriate design techniques. (See Policy CS4)</i>	<b>+/-</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The majority of heritage assets (e.g. listed buildings) are located in the town centre of Ipswich and these may be negatively affected by new retail site allocations. Schemes to make vacant premises look more visually attractive may have both positive and negative effects dependent on the selected design.  <i>It would be beneficial to ensure that retail expansion will be encouraged without compromising the settings of any designated heritage assets. Settings of listed buildings could be improved though appropriate design that would complement surrounding retail buildings. (see Policy CS4)</i>	<b>+</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The policy may contribute to the achievement of the SA objective through allocation of funds to enhance settings of heritage assets in the borough.

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				<i>work to Red House farm should preserve the layout of key structures, including the outbuildings, and the use of historic materials in their construction. Key landscape features nearby, such as the woodland, should be protected from redevelopment. New build within and near to the farm site should sensitively interpret the materials, scale and form of existing buildings.</i>						
ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	<b>+/-</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	It is anticipated that some development will be located on currently undeveloped agricultural fields which will result in significant change of the landscape character in this more rural area of the borough. Positive effects will occur in areas where new housing developments will contribute to the regeneration of the town centre with direct benefits on townscape character. <i>Whilst the primary focus of the policy is not to address landscape issues, it is important to ensure that the gaps between Ipswich and neighbouring villages are maintained to preserve local distinctiveness.</i>	<b>-</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	It is anticipated that new development will be located on currently undeveloped agricultural fields which will result in significant change of the landscape character of the more rural areas of the borough. The policy clearly states that new development will maintain an appropriate physical separation of Westerfield village from Ipswich and include open spaces and green walking and cycling links to Westerfield station thus reducing the negative effect on landscape. The local distinctiveness should also be ensured through appropriate design of new development <i>particularly in terms of scale, height, massing, and alignment.</i>	<b>+</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	The majority of new employment development sites are allocated in urban areas where positive effects on townscape may occur as part of any redevelopment/regeneration schemes.	<b>+</b> <b>S,M –LT</b> <b>D</b> <b>R</b> <b>M</b> <b>C</b>	Extension of the Central Shopping Area into the currently part disused Westgate area will have a direct townscape benefit.	<b>+</b> <b>LT</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	The policy is likely to contribute to the achievement of the SA objective through allocation of funds to invest into public realm enhancement measures.

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HW1 To improve the health of those most in need	<b>+ M –LT D/I R M</b>	There is a relationship between the provision of decent housing and health. Health deprivation is currently higher than national average and it is anticipated that the policy may contribute to the achievement of the SA objective through the additional number of residential units and supply of affordable housing.	<b>+/- M –LT D/I R M</b>	Some negative effects are likely to occur due to loss of a large area of open countryside, including some indirect negative effect associated with deterioration of the air quality in the north part of the borough.  As identified previously for policy CS7, the provision of decent housing will indirectly contribute to the achievement of the SA objective.  In addition, policy CS10 ensures healthy lifestyles through the allocation of land for a Country Park, public space, and a new health centre and walking and cycling routes.  For these reasons it is considered that the effects will be both positive and negative.	<b>+ M –LT I R M</b>	The policy will indirectly contribute to the achievement of the SA objective through creating more employment opportunities in the borough and thus improving the mental health and overall deprivation.	<b>0 S, M –LT D R M</b>	Whilst improvement of health is important, the focus of the policies relates mainly to promotion of retail developments. As such no significant effects have been identified.	<b>+ S, M –LT D R M C</b>	Sport and leisure facilities will be delivered through the implementation of this policy. In addition, developer contributions will be used for the new country park and community facilities including GP surgeries and health centres. It is therefore considered that health issues will be addressed with the implementation of this policy.
HW2 To improve the quality of life where people live and encourage community participation	<b>+ M –LT D/I R M</b>	The quality of life will be partially improved through the provision of decent housing. The policy on its own is not considered to have any direct effect on community participation.	<b>+ M –LT D/I R M</b>	The land to the west of Tuddenham Road north of the railway line is allocated for the replacement playing fields and has the potential to encourage community participation. Additionally, a multi-use community centre will be built as part of the new District Centre thus contributing directly to the achievement of the SA objective.	<b>+ M –LT D/I R M</b>	The policy will contribute to the achievement of the SA objective through supporting the growth of educational facilities and initiatives to improve skills and qualifications levels. The level of educational attainment is low and the local partnerships such as the Suffolk Growth Group may have a positive effect on the economic development of the borough and the quality of life.	<b>+ M –LT D/I R M</b>	Although the land south of Crown street and Old Foundry Road is excluded from the revised policy, on the whole, the policy will contribute to the achievement of the SA objective through providing more choice for residents to access facilities located within a walking distance from their homes (in the CSA and Waterfront) and accessible by public transport.	<b>+ S, M –LT D R M C</b>	On the whole the quality of life will be improved though the provision of key infrastructure facilities e.g. schools, flood defences, etc. Community participation will be encouraged with the creation of a country park and sport and leisure facilities serving the whole borough.
ER1 To reduce poverty and social exclusion	<b>+ M –LT I/D</b>	The policy may contribute indirectly to the achievement of the SA objective in the long term	<b>+/- M –LT I/D</b>	The area of the Northern Fringe is currently ranked as least deprived potentially due to its rural	<b>+ + M –LT D/I</b>	The primary focus of the policy is to promote sustainable economic growth and encourage the provision	<b>+ M –LT D/I</b>	Same as above. In addition, creating jobs in retail will help reducing poverty through	<b>+ S, M –LT I</b>	Improved infrastructure will improve the overall quality of life in the borough and

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	<b>R M</b>	through the provision of decent homes for the growing population of Ipswich. The issues related to the growing number of homeless people may be tackled through the provision of affordable housing. Central, southwest, and southeast areas are ranked as most deprived. The allocation of land for housing will contribute to the redevelopment/regeneration of some areas. Therefore it is considered that effect will be positive.	<b>R M</b>	character. New development may result in increase of crime and antisocial activities with some negative effects on deprivation. However, on the whole the provision of new decent homes may reduce deprivation levels at borough level (See CS7)	<b>R M</b>	of a significant number of jobs mainly through the allocation of land for employment and employment generating uses (e.g. education, leisure, etc.). Therefore it is considered that it will contribute to the achievement of the SA objective.	<b>R M</b>	additional job opportunities.	<b>R M C</b>	attract inward investment. For these reasons it is considered that the policy will have a positive effect on the standard of life and will contribute indirectly to the achievement of the SA objective.
ER2 To offer everybody the opportunity for rewarding and satisfying employment	<b>+ S D/I R L</b>	The primary focus of the policy is not to address employment issues as this is addressed in other policies in the Core Strategy. However, it is considered that in the short term it will contribute to the achievement of the SA objective through increased employment opportunities directly related to the construction of new homes and infrastructure.	<b>+ S, M I/D R M</b>	The SA objective will be achieved through the allocation of land for retail and community uses, and employment opportunities directly related to the construction of new homes and community facilities.	<b>+ + S, M -LT D/I R M C</b>	Although the job figure is lower than that previously identified, it reflects the most recent Forecasting Model in 2012. The revised policy includes a wider range of growth sectors and the SA objective will be achieved through the allocation and protection of employment land and through the joint work with local partners to encourage sustainable growth. As a result, it is anticipated that further employment opportunities will be created.	<b>+ M -LT D/I R M</b>	Although the figure for additional floorspace has been significantly reduced to 15,000sqm, in the medium and long-term the policy will contribute to the achievement of the SA objective through additional retail site allocations and encouraging further investment and development in Ipswich Central Shopping Area.	<b>0 S, M -LT D R M</b>	The primary focus of the policy is not to address employment issues. Although some job opportunities will be created through local infrastructure projects, it is anticipated that overall effect on employment figures will be negligible.
ER3 To help meet the housing requirements for the whole community	<b>+ + S, M -LT D R M</b>	The implementation of the policy will contribute to the achievement of the SA objective through the provision of housing (allocating a minimum 5,909 dwellings net by 2031). The policy clearly states that the future delivery of housing will be in accordance with the housing needs identified in the recently updated Strategic	<b>+ S, M -LT D R M</b>	Policy CS10 will directly contribute to the achievement of the SA objective through the allocation of land for a residential development of approximately 3,500 dwellings. The number of dwellings has been reduced to reflect the capacity of the area. However, it is anticipated that the type of dwellings will address the needs	<b>0 S, M -LT D R M</b>	The housing provision is not a primary function of this policy.	<b>0 S, M -LT D R M</b>	The housing provision is not a primary function of this policy.	<b>0 S, M -LT D R M</b>	The housing provision is not a primary function of this policy.

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		Housing Market Assessment. Housing land supply may limit the opportunities to deliver the full amount of projected housing figures, hence the initiative to consider future opportunities beyond the borough boundaries. <i>Opportunities should be sought the reuse the great number of vacant buildings (around 600 are long term vacant).</i>		identified in the updated SHMA 2012 with regards to the provision of variety of housing types (two and three bedroom houses).						
ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area	<b>+ M –LT D/I R M</b>	The SA objective will be indirectly achieved through meeting the demand of housing and providing opportunities for the borough to grow and develop. Investment in residential developments will create a number of temporary jobs but also will attract further inward investment by becoming a better place to live.	<b>+ M –LT D/I R M</b>	Same as CS7.	<b>+ + S, M –LT D/I R M</b>	There is a strong commitment in the policy to encourage sustainable levels of prosperity through local partnerships and land supply for employment. In addition, it is considered that the support of higher educational facilities will have a long-term positive effect on economic growth as it may tackle issues with regards to low skills and qualification levels.	<b>+ M –LT D/I R M</b>	The figure for additional net retail floorspace has been significantly reduced to 15,000sqm to reflect the needs and ensure that retail growth is promoted in a sustainable manner. New retail site allocations will contribute to further investment in the town centre and key district centres and contribute to overall economic growth throughout the plan area.	<b>+ M –LT D/I R M</b>	See the notes for HW2, ER1 and ER2. Surely infrastructure provision will be crucial to attracting inward investment? Yes, this policy is the most beneficial when it comes to economic SA objectives.
ER5 To support vital and viable town, district and local centres	<b>+ S, M –LT D/I R M C</b>	In general terms it is anticipated that housing will be allocated in both the urban areas (e.g. the Waterfront) and in the peripheral parts of the borough (Northern Fringe). The SA objective will be achieved as it is considered that the influx of new residents will have a positive effect on existing town and district centres. New Local and District Centres will be created in the Northern Fringe to meet the needs of new residents.	<b>+ S, M –LT D/I R M C</b>	The development of the Northern Fringe is likely to affect the viability of Ipswich town centre by drawing away customers as the policy envisages the creation of new District and Local Centres in the Northern Fringe to meet the local needs. However, as it is also considered that the new development will attract new residents and residents from the surrounding areas, which will have a positive effect on both the town centre and local centres through influx of additional users/visitors.	<b>0 S, M –LT D R M</b>	Positive effects are likely to occur where employment sites are allocated near Local and District centres (e.g. IP147) and thus contributing to the achievement of the SA objective. However, it is considered that the overall effect will be negligible as the majority of new employment sites are at a distance from a Local or a District centre.	<b>+ + S, M –LT D/I R M C</b>	The policy strongly supports the SA objective and recognises the importance of increasing the vitality of key district centres.	<b>+ S, M –LT D/I R M C</b>	Positive effects are likely to occur through the provision of public transport facilities, the provision of community facilities in centres and community safety initiatives in the Town centre funded through CIL.

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				Therefore, it is anticipated that the effects will be positive.						
ER6 To encourage efficient patterns of movement in support of economic growth	<b>+/-</b> <b>S, M –LT</b> <b>D</b> <b>I</b> <b>R</b> <b>M</b>	The location and amount of new housing will have a direct effect on patterns of movement across the borough. Some positive effects are likely to occur where housing sites are allocated in the urban central areas within walking distance from the main community facilities and employment hubs. The housing allocated in the periphery of the borough (e.g. IP065) may detract from the SA objective due to the distance to key services and limited public transport options. However, it is accepted that some sites would be near district and local centres.	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>I</b> <b>R</b> <b>M</b> <b>C</b>	The SA objective will be achieved through the provision of new roads, cycling routes, public transport routes and services to connect the Northern Fringe development with the town centre and other areas.	<b>+</b> <b>M –LT</b> <b>D</b> <b>I</b> <b>R</b> <b>M</b>	Efficient patterns of movement will be encouraged through the allocation of land for employment use in areas that are easily accessible by public transport (e.g. former Crane's factory site which is currently served by four bus services).	<b>+</b> <b>M –LT</b> <b>D</b> <b>I</b> <b>R</b> <b>M</b>	Efficient patterns of movement will be encouraged through the allocation of retail sites in areas that are easily accessible by foot and public transport (in central Ipswich).	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>I</b> <b>R</b> <b>M</b> <b>C</b>	The SA objective will be achieved through the Ipswich Major Scheme 'Travel Ipswich' and accessibility improvements between the Central Shopping Area, Waterfront, and railway station.
ER7 To encourage and accommodate both indigenous and inward investment	<b>+</b> <b>M –LT</b> <b>D</b> <b>I</b> <b>R</b> <b>M</b>	Same as ER4.	<b>+</b> <b>M –LT</b> <b>D</b> <b>I</b> <b>R</b> <b>M</b>	The SA objective will be indirectly achieved through meeting the demand of housing and providing opportunities for the borough to grow and develop. Investment in residential developments will create a number of temporary jobs but may also attract further inward investment by becoming a better place to live.	<b>+</b> <b>M –LT</b> <b>D</b> <b>I</b> <b>R</b> <b>M</b>	The policy will contribute directly to the achievement of the SA objective through allocation of sufficient land for employment use including leisure, hospitality and retail. In addition, the policy clearly states that employment uses in existing employment areas will be protected which may encourage further investment in the borough.	<b>+</b> <b>M –LT</b> <b>D</b> <b>I</b> <b>R</b> <b>M</b>	Same as ER4.	<b>+</b> <b>S, M –LT</b> <b>I</b> <b>R</b> <b>M</b> <b>C</b>	Same as ER1. See ER4 comment. Yes, that has already been mentioned in ER1.
CL1 To maintain and improve access to education and skills for both young	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>I</b> <b>R</b> <b>M</b> <b>C</b>	The policy itself does not refer to education needs although it states that the phasing of housing sites will be informed by infrastructure delivery, which includes sites for additional primary schools in the	<b>+</b> <b>S, M –LT</b> <b>D</b> <b>I</b> <b>R</b> <b>M</b> <b>C</b>	There is a need to improve educational attainment in the borough as it is considered that low skill levels and the mismatch between supply and demand of qualified young people is one of	<b>+</b> <b>S</b> <b>D</b> <b>I</b> <b>R</b> <b>M</b> <b>C</b>	Same as HW2 and ER4.	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	There is no clear relationship between the policy and the SA objective.	<b>+</b> <b>S</b> <b>D</b> <b>I</b> <b>R</b> <b>L</b> <b>C</b>	The implementation of the policy has the potential to improve educational attainment through the strategic provision of new schools. However, it is

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people and adults		borough. However, other policies address education needs. CS15 has a specific focus on education provision and states that new primary schools provision will be needed to meet the demands of growth. Where housing is allocated in the urban town centre (IP-One area) a new primary school (IP258) is envisaged to accommodate the amount of population growth. In addition, housing allocated in IP-One area will benefit from the close location of Suffolk New College and University Campus Suffolk. CS10 provides details of all education facilities to be built in the Northern Fringe to achieve the SA objective.		the main barriers to economic growth. The revised policy is more specific in the provision of education facilities such as schools, library, etc. The policy envisages the delivery of three primary schools, a secondary school and sixth form to meet the needs of the residents in the new neighbourhoods. Although the provision of these facilities will contribute to the achievement of the SA objective, it would be beneficial if opportunities to provide facilities for training and further education for adults are also considered.						uncertain whether the overall educational attainment will be improved significantly as other factors also influence the level of skills and qualifications and as such, the level of certainty has been indicated as low.
CD1 To minimise potential opportunities for crime and anti-social activity	<b>-</b> <b>S</b> <b>D</b> <b>R</b> <b>L</b> <b>C</b>	Crime rates are higher than national average with high records of organised crime and hate crime amongst others. The growth in population may result in an increase in thefts in the short term but as this not the only factor that contributes to increase of crime levels, certainty of prediction is rather low.  <i>Mitigation measures would include safety by design principles incorporated in new developments.</i>	<b>-</b> <b>S</b> <b>D</b> <b>R</b> <b>L</b>	Same as CS7.	<b>+</b> <b>S</b> <b>D/I</b> <b>R</b> <b>M</b> <b>C</b>	Whilst there is no direct relationship between the policy and the achievement of the SA objective, it is considered that employment growth may result in overall reduction of poverty and thus decreasing crime levels in the long term.	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	There is no clear relationship between the policy and the SA objective.	<b>0</b> <b>S, M –LT</b> <b>D</b> <b>R</b> <b>M</b>	There is no clear relationship between the policy and the SA objective.