



Strategic Environmental Assessment and Sustainability Appraisal

Proposed Submission Draft Site Allocations and
Policies (Incorporating IP-One Area Action Plan)
Development Plan Document

SA Report

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Ipswich Borough Council

Strategic Environmental Assessment and Sustainability Appraisal

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SA Report

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ABBREVIATIONS

AAP	Area Action Plan
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
PPPs	Plans, Policies, Programmes
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SBRC	Suffolk Biodiversity Records Centre
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems

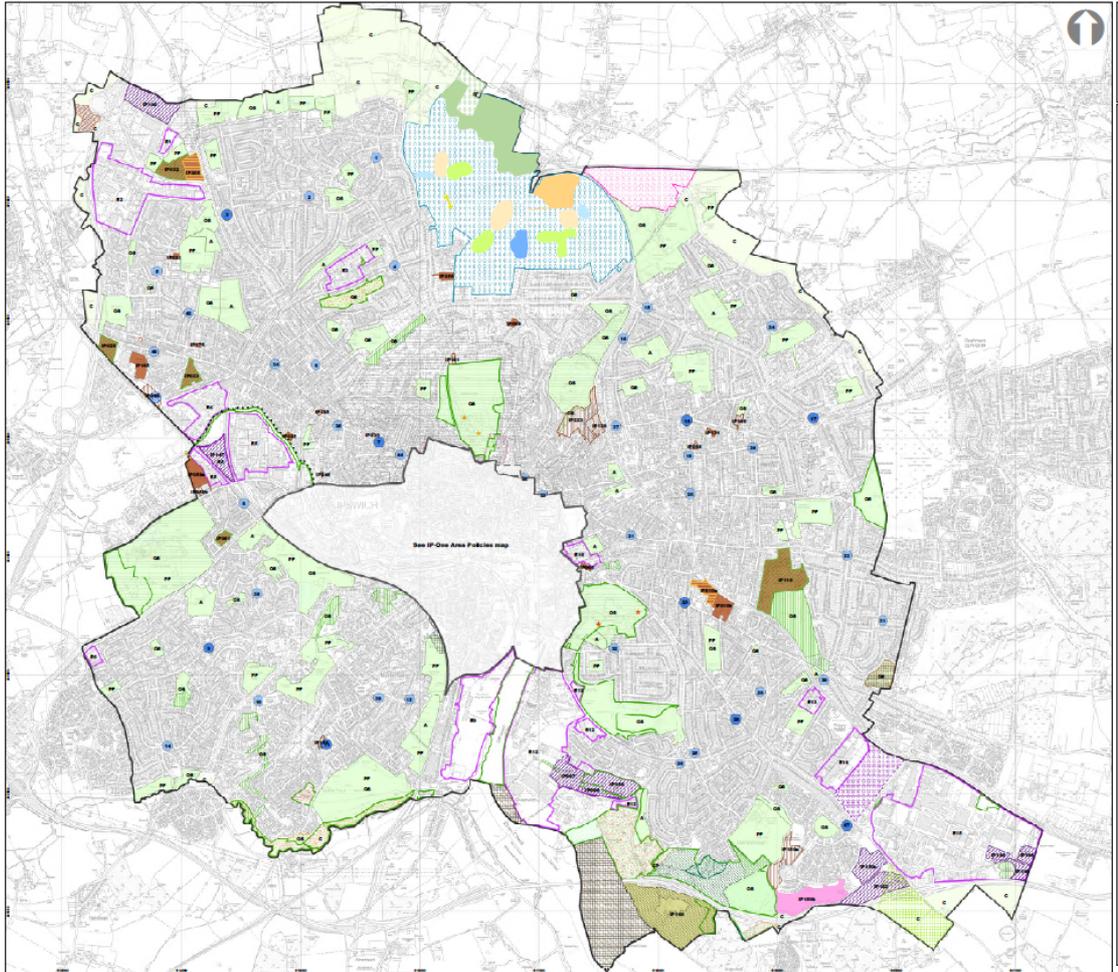
1 INTRODUCTION

- 1.1.1. The overarching framework for development in Ipswich Borough to 2027 has been set out in the Core Strategy and Policies plan adopted on 14th December 2011 (currently being reviewed). The Core Strategy also identified strategic sites for development at the Northern Fringe and the former Crane's factory. The Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document (hereinafter referred to as the 'Site Allocations' DPD) adds the site-specific detail to that strategy across the whole Borough. It incorporates the 'IP-One' area of central Ipswich, which was previously dealt with in a separate plan. It will be accompanied by an updated policies map, showing on an Ordnance Survey base map sites for development and those for protection.
- 1.1.2. The previous version of the Site Allocations DPD was assessed in 2013 and subject to informal consultation in early 2014. Public consultation was undertaken (under Regulation 18) on two draft development plan documents (Core Strategy Focused Review and Draft Site Allocations DPD) between January and March 2014. The Core Strategy at this stage was published as a focused review, but the Council has now been advised that the extent of changes proposed amounts to a full review. The plan updates housing and employment numbers and allocates all the land at the Northern Fringe for the Ipswich Garden Suburb development, allowing more of it to come forward sooner. Therefore, the Council is reviewing the whole Core Strategy document to 2031 alongside the emerging Site Allocations plan.
- 1.1.3. Due to the Core Strategy being reviewed and subsequent re-organisation of the two documents the Site Allocations DPD has been subject to this updated SA. 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 the findings of the SA of the Site Allocations DPD.
- 1.1.4. This report relates to the Proposed Submission Site Allocations DPD and is available for comment for 12 weeks between 12th December 2014 and 5th March 2015.

1.1 Background to and Purpose of the Site Allocations DPD

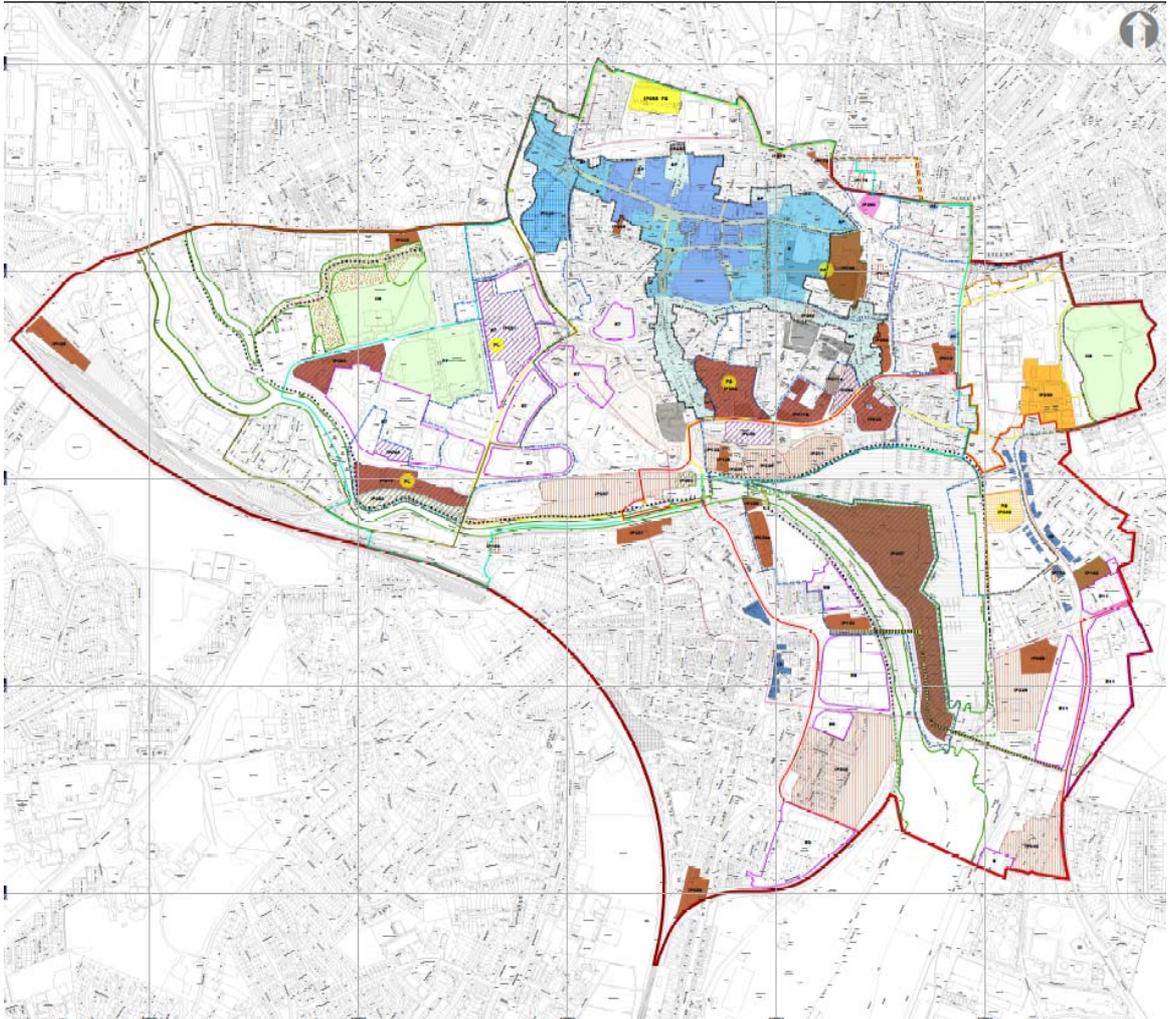
- 1.1.5. The Site Allocations DPD will provide detailed site allocations and guidance across the borough, as shown on Figure 1-1 below. It will incorporate specific planning guidance for a defined area of central Ipswich known as IP-One as shown on Figure 1-2 below.

Figure 1-1 Ipswich Borough Council Draft Site Allocations DPD Policies Map



Source: Ipswich Borough Council (November 2014)

Figure 1-2 Ipswich Borough Council Draft Site Allocations DPD Policies Map IP-One Area



Source: Ipswich Borough Council (November 2014)

1.1.6. The draft Site Allocations DPD includes the following key elements:

- Vision and Objectives
- Site Allocation Policies
- IP-One Policies
- IP-One Opportunity Areas
- Implementation, Targets, Monitoring and Review

1.1.7. The draft Site Allocations DPD was consulted on as part of the informal consultation under Regulation 18, inviting representations on its content. The Council consulted on the Preferred Options for two plans, Site Allocations and IP-One, in early 2008.

1.1.8. The preparation of the Site Allocations DPD commenced with a call for sites issued in February 2013. A joint Scoping Report for the Core Strategy Focused Review and the Site Allocations DPD was prepared for the scoping consultation, which ran between 25th October and 28th November 2013. Representations received from stakeholders and the public alike were

considered when drafting the Site Allocations DPD and the corresponding SA Report. Another round of informal consultation was undertaken in 2014 on the full draft of the plan. Following the consultation, the plan has been reviewed and updated taking into account recommendations from the SA and stakeholder responses. Comments received on the SA Report and responses to these are contained in Appendix C.

- 1.1.9. Table 1-1 presents an indicative programme for the Site Allocations DPD and future consultation dates.

Table 1-1 Indicative Programme for the Site Allocations DPD

Date	Stage/Element of the Site Allocations DPD
February – December 2013	Development of the Site Allocations DPD
January to March 2014	Informal consultation on the Site Allocations DPD
March to November 2014	Consider comments and Site Allocations DPD development
December 2014 to March 2015	Formal publication and consultation period for the Site Allocations DPD
July 2015	Submission
Autumn 2015	Independent examination of Site Allocations DPD by a planning inspector
Autumn 2015	Formal adoption of the Site Allocations DPD

1.2 Background to and Purpose of the SA Report

- 1.2.1 SA (incorporating the requirements of the SEA Directive¹) has been undertaken on the Site Allocations DPD throughout its development. SA is an essential tool for ensuring that the principles of sustainable development are inherent throughout the preparation of the DPD 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 DPD 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.
- 1.2.2 An SA of the Preferred Options for the IP-One Area Action Plan and Site Allocations and Policies was prepared in 2007. Since then, the IP- One Area Action Plan and the Site Allocations and Policies DPD have been combined into the Site Allocations and Policies DPD. Because of the time that has elapsed and the changes to the plans, the Council has decided that this SA will assess the combined DPD as a new document. The findings of the previous SA will, however, inform the assessment.
- 1.2.3 This SA Report provides a summary of the SA process so far and presents the findings and recommendations of the assessment of the draft Site Allocations DPD. The key aims are to:
- Provide information on the Site Allocations DPD and the SA process;

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

- 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 site allocations;
- Recommend measures to avoid, reduce or offset any potentially significant adverse effects.

It is essential that the Proposed Submission Site Allocations DPD 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.

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 Site Allocations DPD 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 Site Allocations DPD (including the SA Framework), together with an overview of the consultation requirements.
3: The Site Allocations Alternatives	Outlines the development of alternative options that were considered and appraised as part of the development of the Site Allocations DPD.
4: Appraisal of the Site Allocations	Presents the appraisal of the policies and site allocations 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 Site Allocations.
Appendix B	Contains the baseline data, a summary of which is presented in Chapter 2.
Appendix C	Scoping Letter Comments and Summary of Comments and Responses received Jan-March 2014
Appendix D	Contains the assessment of alternative site uses
Appendix E	Contains the assessment of SP Policies
Appendix F	Contains the assessment of Site Allocations
Appendix G	Contains the assessment of Opportunity Areas

2 SUSTAINABILITY APPRAISAL

2.1 Legal Requirements

- 2.1.1 It is a legal requirement that the Site Allocations DPD 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 Regulations².
- 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 Site Allocations DPD 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 Planning Advisory Service (<http://www.pas.gov.uk/pas/core/page.do?pagelId=152450>). In addition, published Government guidance on SEA³ (hereafter referred to as the Practical Guide) has also been followed.

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 Site Allocations DPD 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 SA Report.

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 Site Allocations DPD
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope			
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</i>	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. Following the changes to the structure of the plan in

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

³ 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 Site Allocations DPD
	<i>preparation</i> " (Annex 1(e))		Summer/Autumn 2014 a further scoping letter was produced which was consulted upon in September and October 2014.
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	During this stage the scope of the SA for the Site Allocations 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.	
Stage B: Developing and Refining Options and Assessing Effects			
B1: Testing the Site Allocations DPD'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"</i> and give <i>"an outline of the reasons for selecting the alternatives dealt with"</i> (Article 5.1 and Annex I(h)) 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) 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>	Chapters 3 and 4 and Appendix D, E, F, G.	Stage B of the SEA process is linked to the overall production of the Site Allocations DPD which includes the development of the site allocations and preferred options. This SA Report presents the findings of the assessment of policies and site allocations.
B2: Developing the Site Allocations DPD Options			
B3: Predicting the effects of the Site Allocations DPD			
B4: Evaluating the effects of the Site Allocations DPD			
B5: Considering ways of mitigating adverse effects and maximising beneficial effects			
B6: Proposing	<i>The Environmental Report should provide information on</i>		

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Site Allocations DPD
measures to monitor the significant effects of implementing the Site Allocations DPD	<i>"a description of the measures envisaged concerning monitoring"</i> (Annex I (i))		
Stage C: Preparing the SA Report			
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.	A 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 included with the SA Report.
Stage D: Consultation on the Site Allocations DPD and the SA Report			
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 SA Report accompanying the Proposed Submission Site Allocations DPD will be consulted upon in accordance with Regulation 19 and 20 of the Town and Country Planning (Local Planning) (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 as part of the Examination process. It will be essential for the SA Report and the Site Allocations DPD to remain consistent.
D3: Making decisions and providing information			
Stage E: Monitoring the significant effects of implementing the Site Allocations DPD			
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 Site Allocations DPD, 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 Site Allocations DPD has been undertaken in order to contribute to the development of both the SA and the Site Allocations 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 Site Allocations DPD.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the Site Allocations DPD.

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 Site Allocations DPD 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 Strategy⁴ which outlines the over-arching Government objective to raise the quality of life in our communities.
- 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 and Sub-Regional Level Plans

- 2.3.9 A wealth of different plans and strategies have been produced at the regional (East of England) and sub-regional (Suffolk / East Anglia) 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

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

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 Site Allocations DPD 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 such as the East of England Plan (Regional Spatial Strategy 2008) which was revoked in 2013.

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 Site Allocations DPD and the SA should draw from these documents and transpose their aims in their policies and proposals. These local policy plans have been instrumental in the development of the SA Framework (refer to Section 2.4). 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 Ipswich area. It is through identifying these themes and incorporating them into the Site Allocations 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 Site Allocations DPD where relevant.
- 2.3.16 The environmental, social and economic baseline was characterised through the following methods:
- Review of relevant local, sub- regional, regional, national and international plans, policies and environmental protection objectives;
 - Data gathering using 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.
 - Consideration of the scope and contents of the Site Allocations DPD.
- 2.3.17 A detailed description of the baseline characteristics of the Ipswich area is provided in Appendix B.

Key Sustainability Issues and Opportunities

- 2.3.18 Baseline data has been used to identify the key sustainability issues and opportunities in Ipswich and the adjacent authorities. Issues and opportunities are presented in Table 2-2. Although issues / opportunities have been grouped by broad sustainability theme, many are indirectly or directly linked and 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 districts 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 through allocating sufficient land to meet objectively assessed housing need in accordance with the Strategic Housing Marketing Assessment 2012 and allocating land for community facilities.</p> <p>Planning for a rise in the number of primary school age children is necessary, where appropriate, based on the level of forecast population growth and demand.</p> <p>Additionally, supporting the completion of regeneration projects at the Waterfront would provide opportunities to address some issues relating to the provision of housing and community facilities.</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 are certain limitations as to how far the Site Allocations DPD could contribute to improving educational attainment in the borough since most of the schools to be built are primary schools and one secondary school. Land could be allocated for new schools to meet the demand of the growing population and the influx of new residents but the effects from such policy on the overall educational attainment would be minor positive since educational attainment is influenced by other factors.</p> <p>Opportunities with regards to educational attainment are more specifically addressed within the Suffolk Growth Strategy 2013 and the Site Allocations DPD will only have a supporting role in safeguarding land for educational use.</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</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>There are opportunities to provide recreational facilities which could improve levels of physical fitness. Opportunities should also be sought to encourage walking and cycling through the location and design of development.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
	<p>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>	
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 the area is classed as being in 'severe water stress'. 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>The sustainability issues with regards to the SA topic Water are predominantly dealt with through policies included in the Core Strategy.</p> <p>Flood risk issues should be taken into consideration when allocating sites for development.</p>
Soil and Land Quality	<p>Much of Ipswich is an urban built up environment. There is some known potentially contaminated land within the Borough.</p> <p>In 2011/12, there was 67.2 hectares vacant or derelict land. (141.8 hectares total including sites in use, allocated or with planning permission) (Ipswich National Land Use database 2014).</p>	<p>Opportunities should be sought to include allotment space within the Borough where possible.</p> <p>Using brownfield land where possible should be encouraged. Any sites allocated for development which include potentially contaminated land should be remediated before re-use.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
Air Quality	<p>There are four Air Quality Management Areas (AQMAs) within the Ipswich Borough, all of which are designated for NO₂ 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 e.g. through the location of sites in areas already served by public transport or at distance from the main community facilities which will encourage sustainable modes of transport.</p>
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 2017 (Environment Agency).</p> <p>In 2011, the estimate of CO₂ emissions for Ipswich was 4.2 tonnes per capita (Dept of Energy & Climate Change, 2011 data). When compared with CO₂ emissions per capita for Suffolk in 2009, Ipswich performed better (see Appendix B).</p> <p>There were no applications for renewable energy developments in 2013/14 (Ipswich Borough Council, 2014).</p>	<p>Flood risk issues should be taken into consideration when allocating sites for development and new development should be encouraged to use SuDS to manage runoff and further reduce flood risk on sites allocated within Flood Zones (particularly as some new development would be situated on previously undeveloped land).</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). When allocating sites for development, consideration should be given to the proximity of the development to the designated sites and the most appropriate use of the land.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
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 Historic Environment Record.</p>	<p>It is important to ensure that the cultural heritage is protected and that cultural heritage issues are taken into consideration in allocating new sites for development.</p> <p>Cultural heritage features should be conserved and enhanced.</p>
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, when allocating sites for development it is important to maintain the gap between Ipswich and adjacent villages to preserve local distinctiveness.</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 now operational at Great Blakenham (Masons Quarry) which lies approximately 3km north of the Borough boundary, therefore transport implications must be managed carefully.</p> <p>In 2012/13 40.8% of waste in Ipswich was recycled and composted (Ipswich Borough Council, September 2014). Reuse / recycling / composting rates were lower than those recorded for Suffolk, the East of England and England between 2008 and 2012.</p>	<p>Waste management issues are addressed through policies included in the Core Strategy (e.g. Policy CS4) and opportunities are identified in Table 3-2.</p> <p>Sites for waste management facilities are allocated through the Waste Core Strategy prepared by Suffolk County Council.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
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>It will be important to ensure that new development can be easily accessed by public transport, cycling and walking through location of sites for development.</p> <p>It will be important to manage the additional travel demands that growth will generate and guide as many as possible to sustainable modes for the good of the environment, economy and health.</p> <p>The cycling and walking network within the Borough should be expanded and enhanced, particularly between the Waterfront and town centre.</p>
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 higher 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 average (State of Ipswich 2014) and the Borough has higher numbers of people claiming benefits than county and national indicators suggest (2012-13).</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>Allocating enough good quality employment land to attract and retain jobs within the Borough is the main opportunity identified with regards to the SA topic.</p> <p>In addition, 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.</p> <p>Allocating suitable and available sites for future town centre development to attract new investment in the centre without overstressing it is a key opportunity.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
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>However, recorded crimes per 1000 of Ipswich's population have fallen from 106 in 2008-2009 to 77 in 2013-2014.</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 secured 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 (reduce) 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. 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>96 dwellings (net) were completed between 1st April 2012 and 31st March 2013, 7 of which were affordable housing completions (7.3%). 59 of these dwellings were on previously developed land (61.5%) and 17 were within the central IP-One area (17.7%). Gross housing completions (before calculating those dwellings lost) were 111 (AMR 2012-2013).</p> <p>The number of housing completions has fallen from a peak in 2007/08 as a result of the recession and lower demand for flats in this period. Completions for 2012/13 were at the lowest level in Ipswich since 1998/99 when 60 dwellings were completed. Affordable housing completions vary from year to year influenced by the availability of funding available and Ipswich Borough Council has commenced a programme of affordable house building across the borough with 108 dwellings to be built on a site at Bader Close in east Ipswich in addition to 7 dwellings completed on Coltsfoot Road and Whitton Church Lane. The Council's adopted Core Strategy (2011) 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.</p> <p>Much of recent housing development in Ipswich, however, has been in the form</p>	<p>Allocating sufficient land to meet objectively assessed housing need in accordance with the Strategic Housing Marketing Assessment 2012 will be sought.</p> <p>Housing regeneration efforts present a significant opportunity both to revitalise the housing stock, address deprivation and to improve quality of life.</p>

SA Topic	Key Sustainability Issues	Key Sustainability Opportunities
	<p>of one and two bedroomed apartments and in the present economic climate there is an oversupply of flats.</p> <p>2.9% of all dwellings in Ipswich were vacant in 2011/12, representing a decrease from 3.3% in 2010/11. This figure is slightly lower than the Suffolk and England average although slightly higher than the East of England average.</p> <p>There are 972 vacant homes in Ipswich (2014), a decrease from 1,750 in 2011/12.</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 Local Plan and subsequently the SA of Ipswich's now adopted Core Strategy DPD.
- 2.3.22 The SA Objectives have since been reviewed and have been slightly modified to reflect the requirements of the Site Allocations DPD and to take into account the consultation responses.
- 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.
- 2.3.24 The purpose of identifying indicators in Table 2-3 is to enable the assessment to consider what effect a policy may have upon these indicators. Indicators proposed to monitor the significant effects of the plan are set out later in this report.

Table 2-3 The SA Framework

SA Objective		Sub-objectives	SA Indicator	Source
ET1	To improve air quality	<ul style="list-style-type: none"> ▪ Would the policy contribute to the protection and improvement of local air quality? ▪ Would the policy contribute to the impact of traffic congestion on air quality? 	<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"> ▪ Would any new developments protect the land within the Borough from new contamination and exposure to existing contaminated land? ▪ Would new developments help to maintain and enhance soil quality where possible? 	<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"> ▪ Would the implementation of the policy increase the proportion of waste recycling and re-use? ▪ Would the implementation of the policy reduce the production of waste per capita? ▪ Would the implementation of the policies result in reduction of the proportion of waste landfilled? ▪ Would new developments encourage a reduced demand for raw materials? ▪ Would new developments promote the use of recycled and secondary materials in construction? 	<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		Sub-objectives	SA Indicator	Source
ET4	To reduce the effects of traffic upon the environment	<ul style="list-style-type: none"> ▪ Would the policy ensure that public transport services meet people's needs i.e. through new bus services? ▪ Would the policy ensure that highways infrastructure meets people's needs (including walking and cycling routes)? ▪ Would new developments promote the use of sustainable travel modes and reduce dependence on the private car? 	<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 ⁵ for all sectors of the population	<ul style="list-style-type: none"> ▪ Would new development maintain and improve access to essential services and facilities? ▪ Would new development improve access to open space? 	<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 www.communities.gov.uk

⁵ District and/or Local centres have been used as a good indication of the location of services but it is noted that some services, particularly non-retail services, may also be provided outside of these locations.

SA Objective		Sub-objectives	SA Indicator	Source
ET6	To limit and adapt to climate change	<ul style="list-style-type: none"> ▪ Would new developments contribute to a reduction in greenhouse gas emissions? ▪ Would new developments require the inclusion of SuDS? ▪ Would new developments reduce the demand for energy and increase energy efficiency? ▪ Would new developments increase the use of renewable energy? ▪ Would the policy contribute to a reduction in CO₂ emissions from the transport sector? ▪ Would new developments reduce and manage flooding? 	<p>ET6a. Total CO₂ 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>	<p>ONS</p> <p>Department for Energy and Climate Change (DECC)</p> <p>Ipswich Borough Council</p>
ET7	To protect and enhance the quality of water features and resources and reduce the risk of flooding	<ul style="list-style-type: none"> ▪ Would the policy ensure the protection and enhancement of ground and surface water quality? ▪ Would the policy encourage sustainable use of water resources? ▪ Would the policy encourage the inclusion of flood mitigation measures such as SuDS? ▪ Would new developments reduce and manage flooding? 	<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>

SA Objective		Sub-objectives	SA Indicator	Source
ET8	To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	<ul style="list-style-type: none"> ▪ Would the policy protect and enhance designated sites of nature conservation importance? ▪ Would the policy protect and enhance wildlife especially rare and endangered species? ▪ Would new developments protect and enhance habitats and wildlife corridors? ▪ Would new developments provide opportunities for people to access wildlife and open green spaces? ▪ Would new development protect and enhance geodiversity? 	<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>www.magic.gov.uk</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"> ▪ Would the policy protect and enhance heritage assets and their setting? ▪ Would the policy contribute to the protection and enhancement of historic landscape / townscape value? 	<p>ET9a. Number of heritage assets 'at risk'</p> <p>ET9b. Number of listed buildings reviewed annually for condition, repair and 'at risk' status</p>	<p>English Heritage</p> <p>Ipswich Borough Council</p>
ET10	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	<ul style="list-style-type: none"> ▪ Would new developments protect and enhance landscape character and quality? ▪ Would new developments protect and enhance townscape character and quality? ▪ Would new developments promote sensitive design in development? ▪ Would new developments promote local distinctiveness? 	<p>ET10a. Percentage of new housing completions achieving design standards such as Building for Life and Lifetime Homes</p>	<p>Ipswich Borough Council</p>

SA Objective		Sub-objectives	SA Indicator	Source
HW1	To improve the health of those most in need	<ul style="list-style-type: none"> ▪ Would the implementation of the policy improve access to health and social care services? ▪ Would the policy contribute to a reduction in health inequalities amongst different groups in the community? ▪ Would new developments promote healthy lifestyles? 	<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> <p>HW1d. Levels of physical activity data</p> <p>HW1e. Number of GP registrations for depression</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"> ▪ Would new development encourage community participation? ▪ Would new development protect residential amenity from pollution? ▪ Would new developments minimise noise and light pollution? 	<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"> ▪ Would the policy contribute to reduced overall levels of deprivation? 	<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>	www.communities.gov.uk Ipswich Borough Council / Suffolk County Council
ER2	To offer everybody the opportunity for rewarding and satisfying employment	<ul style="list-style-type: none"> ▪ Would the policy contribute to a reduction in unemployment in the areas most at need? ▪ Would new developments improve physical accessibility to jobs for those in greatest need? ▪ Would the policy ensure people are educated, trained and skilled to meet local economic needs? ▪ Would the policy ensure labour supply meets local economic needs? 	<p>ER2a. Working age unemployment</p> <p>ER2b. Employment by occupation</p> <p>ER2c. Youth unemployment data</p> <p>ER2d. Long term unemployment data</p> <p>ER2e. Average wage data</p>	ONS / National Online Manpower Information System (NOMIS) Ipswich Borough Council www.communities.gov.uk

SA Objective		Sub-objectives	SA Indicator	Source
ER3	To help meet the housing requirements for the whole community	<ul style="list-style-type: none"> ▪ Would the policy ensure that there is sufficient housing to meet identified needs in all areas? ▪ Would new developments ensure that housing meets acceptable standards? ▪ Would new developments increase the availability of affordable housing? 	<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"> ▪ Would the policy encourage new business formation? ▪ Would the policy increase and diversify employment opportunities? ▪ Would the policy encourage economic growth? ▪ Would the policy ensure sufficient land, buildings and premises are available to accommodate business start-up and growth? ▪ Would the policy ensure Infrastructure (including transportation) meets the needs of business? 	<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>www.nomisweb.co.uk</p>
ER5	To support vital and viable town, district and local centres	<ul style="list-style-type: none"> ▪ Would new developments maintain and improve access to shops, services and facilities in centres? ▪ Would new developments ensure a mix of retail units in centres? 	<p>ER5a. No. / Percentage of vacant retail units</p> <p>ER5b. Commercial / retail rental data</p> <p>ER5c Percentage of new retail floorspace developed within defined centres.</p>	<p>Ipswich Borough Council</p> <p>www.communities.gov.uk</p>

SA Objective		Sub-objectives	SA Indicator	Source
ER6	To encourage efficient patterns of movement in support of economic growth	<ul style="list-style-type: none"> ▪ Would the policy ensure sufficient land, buildings and premises are available to accommodate business start-up and growth? ▪ Would the policy ensure Infrastructure (including transportation) meets the needs of business? ▪ Would the policy ensure that public transport services meet people's needs i.e. through new bus services? ▪ Would the policy ensure that highways infrastructure meets people's needs (including walking and cycling routes)? ▪ Would the policy promote the use of sustainable travel modes and reduce dependence on the private car? ▪ Would the policy reduce the impact of traffic on the economy? 	<p>ER6a No. / percentage of people working from home</p> <p>ER6b Waiting times at junctions in Ipswich</p> <p>See also ET4a (employment land take up) and HW1b (journey to work)</p>	Ipswich Borough Council Suffolk County Council
ER7	To encourage and accommodate both indigenous and inward investment	<ul style="list-style-type: none"> ▪ Would the policy encourage inward investment and new business formation? ▪ Would the policy support the preservation and / or development of a high quality built environment? ▪ Would the policy promote the development of multi-functional green infrastructure in urban areas? ▪ Would the policy enhance the reputation of urban areas as places to live, work and visit? 	<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>	Ipswich Borough Council Suffolk County Council

SA Objective		Sub-objectives	SA Indicator	Source
CL1	To maintain and improve access to education and skills for both young people and adults	<ul style="list-style-type: none"> ▪ Would new development increase levels of participation and attainment in education for all members of society? ▪ Would new development improve access to and involvement in lifelong learning opportunities? ▪ Would new developments improve the provision of education and training facilities? 	<p>CL1a. GCSE Attainment Levels (Grades A*-C)</p> <p>CL1b. Proportion of the population with no qualifications</p>	<p>ONS</p> <p>www.communities.gov.uk</p>
CD1	To minimise potential opportunities for crime and anti-social activity	<ul style="list-style-type: none"> ▪ Would the policy contribute to a reduction in crime levels? ▪ Would the policy contribute to a reduction in the fear of crime? ▪ Would the policy contribute to a reduction in levels of anti-social behaviour? ▪ Would new developments encourage secured by design? 	<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>www.communities.gov.uk</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'
 - ET9: 'To conserve and enhance the historic environment, heritage assets and their settings'
 - 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 is likely to be an increase in 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 production of SPDs, 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: 001-UA006314-UE31-01). The Scoping Report was in two parts – Part One covered the Core Strategy and Part Two, the Site Allocations DPD. Part Two of 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 Site Allocations DPD;
- 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 Site Allocations DPD have been assessed.

2.3.30 In October 2013 consultation was undertaken on the scope of SAs for the Ipswich Site Allocations DPD and the Focused Review of the adopted Core Strategy. Whilst significant SA work has been undertaken on both plans since this time, the scope of these plans has since changed. A Scoping Letter updating the approach and scope of the SA was produced and consulted on in September 2014.

2.3.31 Representations received have been addressed and taken on board in this SA Report. Representations received from the Scoping Letter along with how they were addressed are provided in Appendix C.

Geographical Scope of the Appraisal

2.3.32 The Scoping Report set out the scope and approach to the assessment of the Site Allocations DPD. The geographical scope of the SA has been driven by the geographical scope of the Site Allocations DPD. The Site Allocations DPD will apply to the whole of the Borough. The SA therefore considered the spatial extent of its likely impacts. In some cases, this may only be within the local area but in other cases, the impacts of the policies and site allocations may be felt over a wider area within the Borough or 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

2.3.33 The Site Allocations DPD sets out the framework for facilitating the determination of future planning applications within the Ipswich area until 2031.

Topics Covered in the Appraisal

2.3.34 The SA comprises the consideration of the environmental, social and economic effects of the Site Allocations DPD. 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

2.3.35 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.

Consultation

2.3.36 An SA Interim Report was issued for consultation from 13th January till 10th March 2014 alongside consultation on the Draft Site Allocations DPD. The consultation comments informed the next stage of the development of the DPD. Appendix C shows how the comments received have been responded to.

2.3.37 A Scoping Letter was issued for public consultation from 2nd September to 7th October 2014, 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 council's website.

2.3.38 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 SA Report. Appendix D presents the comments from the scoping consultation.

2.4 Stage B: Developing and Refining Options and Assessing Effects

Background to the Site Allocations DPD SA

2.4.1 SA has been an integral part of the evolution of the plan over time. The stages of development of the DPD and SA work is presented in Table 2-6 below.

Table 2-6 Background to the Site Allocations DPD SA

Year	Plan Document	SA Comments
2005-2007	Issues and Options	Consultation on the Issues and Options for both the Site Allocations and Policies DPD and IP-One Area Action Plan (AAP) was undertaken in January and February 2005. Further consultation was undertaken on specific sites and possible use options in June 2006. A final stage of Issues and Options consultation took place in February 2007 when further sites and possible options were put forward following them being suggested during the 2006 consultation.
November 2007	Preferred Options Site Allocations and Policies DPD	The combined SA (January 2008) assessed the options for the Site Allocations and IP-One AAP.
November 2007	Preferred Options IP-One Area Action Plan	<p>The Preferred Options Site Allocations and Policies DPD did not contain a vision or objectives since these were contained within the Core Strategy document. It contained three Policy Areas which apply to sites or areas within the Borough of Ipswich but outside the IP-One AAP area. It also contained a series of proposed site allocations for different uses e.g. residential, office, etc. The Preferred Options Site Allocations and Policies DPD set out three policies that focus on sites that may be allocated for physical development, or retained for open space or nature conservation purposes.</p> <p>The Preferred Options IP-One AAP set out twenty four policies suggesting uses for identified land areas and site allocations in the town centre of Ipswich.</p> <p>Alternative policies were considered in both documents and were assessed against the SA Objectives.</p>
August 2012	The Preferred Options Site Allocations and Policies	The decision to combine the two plans was taken through the Council's fifth revision of

	DPD and The Preferred Options IP-One Area Action Plan	the Ipswich Local Development Scheme, which was brought into effect in August 2012
December 2013	Draft Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD	SA was undertaken of area-based policies, IP-One Policies, site allocations (including alternative site uses) and Opportunity areas. The SA comments related to consideration of alternative site uses are included in Appendix D of this report.
December 2014	Proposed Submission Site Allocations and Policies (Incorporating IP-One Area Action Plan) DPD	Review of the changes and update of the SA undertaken in 2013.

2.4.2 Assessing the Effects of the Site Allocations DPD

2.4.3 The following elements of the now combined Site Allocations and Policies DPD have been assessed in this SA:

Table 2-7 Elements of the Site Allocations and Policies DPD

Site Allocations	
	SP1 The protection of allocated sites
	SP2 Land allocated for housing
	SP3 Land with planning permission or awaiting a Section 106 Agreement
	SP4 Land protected for Gypsy and Traveller sites
	SP5 Land allocated for employment use
	SP6 Land allocated and protected as open space
	SP7 Land allocated for leisure uses or community facilities
	SP8 Orwell Country Park Extension
	SP9 Safeguarding land on development sites for transport infrastructure
IP-One Area Policies	
	SP10 Retail Site Allocations
	SP11 The Waterfront
	SP12 Education Quarter
	SP13 Ipswich Village
	SP14 Arts, Culture and Tourism
	SP15 Improving Pedestrian and Cycle Routes
	SP16 Transport Proposals in IP-One

	SP17 Town Centre Car Parking
IP-One Opportunity Areas	
	A - Island Site
	B - Merchant Quarter
	C - Mint Quarter and surrounding area
	D - Education Quarter and surrounding area
	E - Westgate
	F - River and Princes Street Corridor

2.4.4 For the assessment of site allocations, the sites were grouped into 24 assessment groups. The grouping was based on geographical location and several sites in an area were grouped together. The groupings also took account of the Ipswich Area Committees. The groups included: Ipswich North West, Ipswich North East, Central, Ipswich South West, Ipswich South East and IP-One.

2.4.5 Each group of sites was assessed against the SA objectives in Appraisal Tables (Appendix F). One table was produced for each site assessment group, comparing each site allocation against each of the 21 SA Objectives topics. This approach provides a better understanding of the likely effects of the site allocations as the group of sites within an area can be considered together and will facilitate the assessment of cumulative impacts.

2.4.6 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 certainty – the level of uncertainty in the prediction will be classified as low, medium or high.

2.4.7 The sites, policies and opportunity areas were assessed against the SA Objectives and the matrix provides commentary and recommendations for further development. Notations used in the assessment are presented in Table 2-7 below.

Table 2-7 Notation used in the appraisals

Major Positive Impact	The policy/site allocation strongly supports the achievement of the SA Objective.	++
Positive Impact	The policy/site allocation partially supports the achievement of the SA Objective.	+
Neutral/ No Impact	There is no clear relationship between the policy/site allocation and / or the achievement of the SA Objective or the relationship is negligible.	0
Positive and negative	The policy/site allocation has a combination of both positive and negative contributions to the achievement of the SA Objective, e.g. a short term	+/-

outcomes	negative impact but a longer term positive impact or different impacts across different areas.	
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.	?
Negative Impact	The policy/site allocation partially detracts from the achievement of the SA Objective.	-
Major Negative Impact	The policy/site allocation strongly detracts from the achievement of the SA Objective.	--

2.4.8 The assessment of the Site Allocations 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.

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

Mitigation Measures

2.4.10 Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Site Allocations DPD. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified. Such recommendations have been presented to the plan-makers throughout the development of the plan and the SA. The matrices in Appendix F include the current remaining recommendations and references to other forms of mitigation that would need to be considered when bringing forward the sites.

Appraisal of Cumulative and Synergistic Effects

2.4.11 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.

- 2.4.12 The potential for cumulative, synergistic or secondary or indirect effects as a result of the Site Allocations DPD has been inherently considered within the appraisal, the findings of which are presented in Section 4.6.

Appraisal of Transboundary Effects

- 2.4.13 The SEA Directive also requires SAs to consider the transboundary effects of the plan on other EU member states. These effects have been noted where appropriate throughout the assessment.

Technical Limitations and Uncertainties

- 2.4.14 During the assessment of the Site Allocations DPD, 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 preclude/mitigate any negative impacts.
- 2.4.15 In addition, a number of data gaps are 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.
- 2.4.16 Finally, the Site Allocations DPD essentially acts as a guidance document for the future development of Ipswich. 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 SA Report presents the findings of the assessments to-date including the information collated in Stage A and during scoping, and documents the entire SA process. 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 Proposed Submission Draft Site Allocations and Policies Plan and the SA Report

- 2.6.1 This SA Report will be issued for consultation alongside Proposed Submission Draft Site Allocations DPD to all key stakeholders (including statutory consultees and the public) for comment. Following the close of the consultation period, IBC will review the feedback and revise the plan as appropriate.

3 APPRAISAL OF THE ALTERNATIVES

3.1 Alternative Vision and Objectives

- 3.1.1 The Core Strategy vision and objectives provide the context for the Site Allocations DPD. The Preferred Options Site Allocations and Policies DPD produced in 2007 does not contain a vision or objectives. However, the IP-One Area Action Plan provided a vision and objectives, which were assessed in the Complete Preferred Options SA (2007). The Proposed Submission Site Allocations and Policies DPD (2014) does not present alternative vision or objectives as these are contained within the Core Strategy DPD. As such, no alternative visions or objectives have been assessed.

3.2 Alternative Policies

Background to the Assessment of Alternative Policies

- 3.2.1 Alternative policies relating to site allocations were assessed in the Preferred Options SA in 2008. The Preferred Options Site Allocations and Policies DPD set out three policies that focus on sites that may be allocated for physical development, or retained for open space or nature conservation purposes. The Preferred Options IP-One Area Action Plan set out twenty four policies suggesting uses for identified land areas and site allocations in the town centre of Ipswich.
- 3.2.2 Alternative policies were considered in both documents and were assessed against the SA Objectives. The document covers a number of alternative options which were considered alongside the chosen one. The policies and their alternatives were assessed against the 22 SA objectives using a scoring system. Of the three policy areas, the preferred options scored better in terms of sustainability on two. One policy (policy area 39) could not be scored since it was seeking to reserve the sites proposed to the uses allocated to them and therefore the impact would vary from site to site.

Appraisal of the 'No Policy' / 'Business as Usual' Option

- 3.2.3 An option representing a 'No Policy' / 'Business as Usual' approach was subject to the SA process as the comparison of options to a 'Business as Usual' situation is a requirement of the SEA Directive. New policies added in the Proposed Submission Site Allocations DPD also include 'no policy' alternative (Appendix E).
- 3.2.4 In the absence of the policies, there is likely to be much greater uncertainty over requirements that proposals for new development will need to address. Whilst the Core Strategy would provide a significant strategic guidance to development across the Borough, there is a need to ensure that policy is consistent and up to date as a whole and for individual sites to provide certainty about micro-setting, the scale or form of development, energy and materials use, the appearance of structures, access to sustainable transport, the impact on local environmental and built heritage features amongst a number of other issues. In particular, without a consistent set of planning guidance in this form, there would be a greater likelihood of a number of smaller adverse effects occurring which could lead to greater overall cumulative effects.
- 3.2.5 In the absence of the policies, there would be less guidance on the way town centre areas should be developed or regenerated to meet identified needs, or on measures to help improve the sustainable access to community facilities. This a 'lost opportunity' type alternative and no policies in place would mean not planning in comprehensive manner to alleviate problems in the

area. Consequently a list of policies are being produced in order to provide greater certainty and direction in a coordinated manner.

3.3 Alternative Site Allocations

3.3.1 Given the limited availability of development land within Ipswich, the Council allocated for development all the sites believed to be suitable and deliverable, in order to comply with the NPPF requirement to meet the objectively assessed housing need. As such, there were no other reasonable alternative sites. Throughout the process of assessing the deliverability, the following constraints were considered:

- Access and Highways
- AQMA within or close to
- Area of Archaeological Importance
- Conservation Areas
- Contaminated Land
- Existing Use
- Flood Zone 2 and 3
- Listed Buildings on site or nearby
- Recreation and Open Space
- Tree Preservation Order (TPO) on site or nearby
- Wildlife site or adjacent to
- Noise

3.3.2 Since the Preferred Options SA prepared in 2007, some sites that were included in the Preferred Options Document have been discounted in the Site Allocations DPD. The discounted sites are listed in Section 5 of the SHLAA Update Report (November 2013) along with the reasons for not taking the sites forward at this stage of the plan. In addition to the sites listed in SHLAA, two more sites (IP175 and IP261) have since been discounted. The main reasons for discounting sites are related to:

- uncertainty with regard to the deliverability of the site within the plan period
- changed circumstances of existing use (when potential development is subject to relocation of existing uses on site)
- development of the site has been completed
- viability issues associated with amenity concerns, access and flood risk

- 3.3.3 The discounted sites are considered unreasonable alternatives therefore no further SA of their allocation was undertaken.
- 3.3.4 A high-level assessment of alternative uses of the selected sites was undertaken in December 2013 (Appendix D Report 003-UA006314-UE31-01). Alternative uses identified for each proposed allocation were compared with reference to their contribution to or impact on the SA Objectives. IP150c Land south of Ravenswood has changed from a housing allocation to employment to support the economy.

4 APPRAISAL OF THE SITE ALLOCATIONS DPD

4.1 Introduction

4.1.1 This section outlines the results of the appraisal of the Site Allocations DPD including details of mitigation measures that could be implemented to improve the performance of the plan.

4.2 Appraisal of Vision and Objectives

4.2.1 The Core Strategy vision and objectives provide the context for the Site Allocations plan.

4.2.2 A key theme of the vision is to promote and enhance sustainable transport within Ipswich. Due to the constrained nature of the borough and the presence of four AQMAs this is a key issue. However, the vision, seeks to implement traffic management measures in conjunction with improvements for pedestrians, cyclists and buses which will ensure effective links between Ipswich, the wider area, the town centre and contribute to keeping congestion down. All of which would benefit the SA Objectives related to air quality (ET1), climate change (ET6) and traffic movements (ET4).

4.2.3 With regards to the natural environment the vision seeks to ensure the Borough's network of beautiful parks, open spaces, green infrastructure and open water is enhanced by new development along with ensuring the historic character of the Borough is conserved and enhanced. This would particularly benefit SA Objectives ET8 'To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs' and ET9 'To conserve and enhance the historic environment, heritage assets and their settings'.

4.2.4 There is an emphasis placed upon the need to create a place 'where people aspire to live, work, learn, visit and invest' which would positively fulfil the social SA Objectives, as creating such a place would include improving housing, community and tourist facilities, employment opportunities, educational provision and would facilitate general regeneration.

4.2.5 The economic SA Objectives would be met through the vision's commitment to providing a concentration of accessible job opportunities within the town centre along with ensuring opportunities are created elsewhere i.e. Futura Park. Providing employment opportunities along with housing provision would seek to promote sustainable economic growth.

4.2.6 The Core Strategy contains 12 Strategic Objectives to deliver the vision:

- 1** High standards of design will be required in new development. Development must be sustainable, environmentally friendly and resilient to the effects of climate change. Standards of acceptability will be raised progressively from 2006 (Building Regulations) levels for all developments in the town in terms of design and environmental performance.
- 2** Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels.
- 3** At least: (a) 13,550 new dwellings shall be provided to meet the needs of Ipswich within the Housing Market Area between 2011 and 2031 in a manner that addresses identified local housing needs and provides a decent home for everyone, with at least 35% at the Ipswich Garden Suburb and 15% in the remainder of the Borough being affordable homes; and (b) in the region of 12,500 additional jobs shall be provided in Ipswich to support growth in the Ipswich Policy Area between 2011 and 2031

- 4** The development of the Borough should be focused primarily within the central Ipswich 'IP-One' area, Ipswich Garden Suburb and within and adjacent to identified district centres.
- 5** Opportunities shall be provided to improve strategic facilities in Ipswich by:
 - Significantly enhancing the town centre in terms of quantity and quality of the shops, the cultural offer and the network of public spaces;
 - Ensuring a new strategic employment site at Futura Park continues to be developed;
 - Extending the strategic greenspace, ecological network and canopy cover; and
 - Continuing to support the development of University Campus Suffolk and Suffolk New College.
- 6** To improve accessibility to and the convenience of all forms of transport, and achieve significant modal shift from the car to more sustainable modes through Travel Ipswich and other local initiatives. This will: (a) promote choice and better health; (b) facilitate sustainable growth, development and regeneration; (c) improve integration, accessibility and connectivity; and (d) promote green infrastructure as alternative 'green' non-vehicular access around the town and urban greening of existing routes. Specifically:
 - Significant improvements should take place to the accessibility to and between the three key nodes of: the railway station (including the wider Ipswich Village environment), the Waterfront (and particularly the Education Quarter) and the Central Shopping Area;
 - Additional east-west highway capacity could be provided within the plan period in the Ipswich area to meet the needs of the wider population and to provide the potential to reallocate some central road space;
 - Comprehensive cycle routes should be provided; and
 - Ipswich Borough Council aspires to an enhanced public transport system.
- 7** Enhanced flood protection including a tidal surge barrier to be in place to protect the town's existing and expanding communities from the threat of tidal flooding.
- 8** To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use, and conserve and enhance the historic environment and landscape character of Ipswich, including historic buildings, archaeology and townscape.
- 9** To retain and provide high quality schools, health facilities, sports and cultural facilities and other key elements of community infrastructure in locations accessible by sustainable means and in time to meet the demands put on such services from the town's growth and ageing population.
- 10** To tackle deprivation and inequalities across the town.
- 11** To improve air quality and create a safer, greener, more cohesive town.
- 12** To work with other local authorities in the Ipswich Policy Area and with community partners to ensure a co-ordinated approach to planning and development.

- 4.2.7 Each of the Core Strategy Strategic Objectives were assessed against the SA Objectives in a compatibility matrix to determine their compatibility and to identify any potential areas where new Strategic Objectives need to be established or the existing ones clarified.
- 4.2.8 On the whole the Strategic Objectives and the SA Objectives complement each other, with many positive correlations and five potential incompatibilities recorded. The link between three Strategic Objectives and three SA Objectives was recorded as uncertain.
- 4.2.9 All five potential incompatibilities were related to Strategic Objective 3, which deals with the development of new housing and new employment sites. Concerns were related to traffic, air quality, waste, energy consumption and biodiversity. These issues however, are partially mitigated by the all-encompassing Strategic Objective 1, as it is taken that a commitment to sustainable and environmentally friendly development will aim to reduce traffic or limit its growth, reduce waste levels and increase recycling and reduce energy consumption (through low carbon or carbon-neutral developments with increased efficiency and/or use of renewable energy or CHP schemes) along with protecting biodiversity resources.
- 4.2.10 The three uncertainties were associated with Strategic Objective 6, transport. These are all related to traffic and increased movements (and its effects i.e. poor air quality). This is because the Strategic Objective supports both improvements to sustainable transport and an increase in road capacity. This issue is mitigated to some extent by clearly stating support for improving public transport and cycling and walking facilities.

4.3 Appraisal of Site Allocation Policies

- 4.3.1 Policies SP1 to SP9 propose development at a number of sites allocated for housing, employment, open space, leisure uses/community facilities, park extension, and transport infrastructure. The potential effects from the implementation of each policy have been assessed through the assessments of the site allocations and the conclusions of these are also relevant to these policies.
- 4.3.2 The more detailed assessment of the site allocations is provided in Appendix F. Sustainability comments related to the policies as such and a summary of the site allocations assessment findings are presented in the section below grouped in tables depending on the proposed site use, e.g. housing, employment, etc.

Policy SP1 The protection of allocated sites

This policy safeguards the uses of allocated sites. The Council provides a commitment that it will only permit alternative uses on allocated sites if compatible with plan objectives and that the site is no longer needed or viable. This commitment would ensure that the assessments of the allocations would still be valid. However, if alternative uses are proposed, these may not address the SA objectives as the original allocation.

Policy SP2 Land Allocated for Housing and

Policy SP3 Land with planning permission or awaiting a Section 106

Policy SP2 and SP3 provide detailed allocations for housing. These include sites allocated for residential development or part residential development within mixed use developments and Sites with Planning Permission or Awaiting a Section 106 Agreement. The implementation of the policies will contribute to the achievement of SA objective ER 3 *To help meet the housing requirements for the whole community*. Indirect benefits are identified with regard to improved quality of life and mental health and well-being through the provision of decent housing (HW1 and HW2). Depending on the location of the sites, some benefits are recorded with regard to remediation of contaminated land. Mixed scores are recorded against air quality, traffic, and

climate change (depending on the location of the site and the size of the development area including density and indicative capacity). The detailed assessment matrices of site allocations are presented in Appendix F and a summary table is set out below.

Policy SP4 Land protected for Gypsy and Traveller sites

Sites currently used by gypsies and travellers are identified on the policies map and are protected for that use. The policy seeks to ensure that housing needs (SA Objective ER3) for this social group are adequately met throughout the plan period through protection of existing sites. However, no new sites are currently allocated therefore it is considered that the policy would not contribute to any significant change from the baseline conditions with regard to the rest of the SA objectives. It is unknown at this stage where a potential site for a permanent pitch would be allocated, therefore it is considered that the overall effect from the implementation of the current policy is uncertain at this stage. Sites for additional Gypsy and Traveller pitches will be assessed against the criteria included in policy CS11 of the Core Strategy. Detailed assessment of the policy against the SA objectives is included in Appendix E.

Policy SP5 Land allocated for employment use

Policy SP5 provides detailed allocation for employment. On the whole, the sites will contribute directly to economic and employment objectives (ER1, ER2, ER4, and ER7). Indirect positive effects are likely to occur with regard to the overall quality of life and mental health (HW1 and HW2). Mixed scores are recorded against the environmental objectives as the potential impacts are largely related to the location of the site, its size and proximity to designated sites or flood risk zones. The assessment of each site allocation is presented in Appendix F and the summary table below.

Policy SP6 Land allocated and protected as open space

The policy seeks to ensure that land is allocated for open space particularly within new development. The provision of open space would have direct health benefits. It would also contribute to the quality of life of the residents and air quality. Some indirect benefits include opportunities for social inclusion and community participation. There are also opportunities for enhancement, which should benefit biodiversity. The assessments of sites are set out in Appendix F and below.

Policy SP7: Land allocated for leisure uses or community facilities

The policy seeks to ensure adequate provision of community facilities to reflect the population growth (e.g. primary schools, health centres, etc.). As a result, the implementation of the policy will broadly achieve objectives related to health, education, community participation and the overall improvement of the quality of life. Land is also allocated for leisure uses, which would address social and economic objectives. Assessments of sites are set out in Appendix F and below.

Policy SP8: Orwell Country Park Extension

Land is allocated as an extension to Orwell Country Park, to provide better management to this part of the Orwell Estuary Special Protection Area. The Council will also investigate further the feasibility of including a visitor centre facility within the site, including any potential impacts on the Special Protection Area. The potential effects from the implementation of the policy have been assessed through the assessment of site allocation IP149 and the conclusions of this are also relevant to SP8. Assessment of IP149 is set out in Appendix F and below.

Policy SP9 Safeguarding land on development sites for transport infrastructure

This policy safeguards land for transport infrastructure and improvements within certain development sites. Potential benefits are identified with regard to air quality, traffic and climate change through the provision of pedestrian and cycle connections at IP010, IP059a, and IP037. These improvements will also help to achieve SA objectives related to health, efficient patterns of movement, community participation and the overall improvement of the quality of life. Detailed assessment of the policy against the SA objectives is included in Appendix E.

Policy SP2 Land Allocated for Housing

Site Allocation	Location	Significant Findings
<p>IP010a: Co-op Depot, Felixstowe Road</p> <p>IP010b: Felixstowe Road</p> <p>IP066 JJ Wilson, White Elm Street</p>	South East	<p>The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The site allocations largely scored positively against the SA Objectives. IP010a, IP010b and IP066 would be developed on previously developed land though the potential for contaminated land has been identified. Proposed development at IP010a, IP010b and IP066 would support SA Objective ET5 (access), ER5 (vital town centres) and ER7 (inward investment) as they are in close proximity to existing District Centre 23 which would improve access to key services in the long term whilst encouraging investment and supporting the viability and vitality of the District Centre. Negative scores were recorded against ET1 (air quality) and ET3 (waste) as the provision of housing would result in an influx of people and private vehicles which would negatively affect air quality and would result in more waste being produced.</p> <p>IP066 is located within an AQMA and additional traffic could contribute to increasing emissions and increasing their effects on the environment (ET1 and ET4). Development at IP010a, IP010b and IP066 would support SA Objective ET6, <i>'To limit and adapt to climate change'</i> by replacing existing buildings and land with modern techniques including insulation and heating methods which would replace existing inefficient practices with modern standards.</p> <p>Development at each of the sites would also support SA Objective HW1 (health), HW2 (quality of life) as it would improve the quality of housing stock and would contribute towards increasing the quality of life for residents.</p>
<p>IP059a: Elton Park Industrial Estate</p> <p>IP061 School Site, Lavenham Road</p>	South West	<p>The sites would directly support ER3 (housing) by providing housing to meet housing requirements. Mixed scores recorded for IP059a and IP061 against the SA Objectives. The increase of people and cars in the long term would have negative effects on air quality and the environment due to vehicular emissions and would increase waste production (ET1, ET3, ET4 and ET6). The proposed development is on brownfield land. The sites would support SA Objective HW1 (health), HW2 (quality of life) and ER1 (poverty) as they would improve the quality of housing stock and would contribute towards increasing the quality of life for residents. The improvement of housing stock within the area would aid economic regeneration which would raise living standards and help to minimise anti-social activity (CD1).</p>
<p>IP245:12-12a Arcade Street</p> <p>IP040 and IP041: Civic Centre Area / Civic Drive</p>	IP One Area Central	<p>The sites are located in urban Ipswich and would be developed on brownfield land; remediation of this land would benefit the soil resources and support SA Objective ET2. Due to the location of the sites in the central urban area, access to facilities and shopping areas would be improved which would benefit SA Objective ET5. The site scored positively against HW1 (health) as the provision of homes close to community facilities would encourage walking/cycling.</p> <p>Due to the location of IP040, in the central urban area of Ipswich access to facilities and shopping areas would be improved which would benefit SA Objective ET5 (access). The site scored positively against HW1 (health) as the provision of homes close to community facilities would encourage walking/cycling. IP040 would directly support ER3 (housing) by providing housing to meet housing requirements. The site scored positively and negatively for ET9 <i>"To conserve and enhance the historic environment, heritage assets and their settings"</i> as it is located in an Area of Archaeological importance and near a Conservation Area.</p>

Site Allocation	Location	Significant Findings
<p>IP172: 15-19 St Margaret's Green</p> <p>IP214: 300 Old Foundry Road</p>	<p>IP One Area Central</p>	<p>The sites would directly support ER3 (housing) by providing housing to meet housing requirements. Each of the sites scored positively and negatively for ET9 <i>'To conserve and enhance the historic environment, heritage assets and their settings'</i> as the site is located in an Area of Archaeological importance and near a Conservation Area. The sites are to be developed on previously developed land and there is the potential to encounter contaminated land. However, remediation would help improve soil resources. The sites scored positively against SA Objective ET4, 'To reduce the effects of traffic upon the environment' as the sites are located in close proximity to the primary and secondary shopping areas and this may reduce the need to travel by private car.</p> <p>The sites are not located in a flood risk area and there may be benefits for water if there are opportunities to remediate some historical areas of contamination.</p> <p>Site IP172 and IP214 scored positively against SA Objectives HW1 (health), HW2 (quality of life), and ER6 (efficient patterns of movement) as the provision of quality housing close to Christchurch Park and close to land allocated for community and leisure use could help to encourage healthier lifestyles, efficient patterns of movement and community participation.</p>
<p>IP048: Mint Quarter / Cox Lane</p>	<p>IP One Area Central</p>	<p>The site would support the viability and vitality of centres due to the central location and it would directly support SA Objective ER3 (housing) by providing housing to meet community requirements. IP048 scored negatively against SA Objective ET1 (air quality) as it is located close to an AQMA due to the potential increase in traffic from car use. In addition, there are potential negative effects associated with dust air and pollution during construction. IP048 also scored negatively against ET3 (waste) and ET8 (biodiversity) as it is likely to result in increased waste generation due to housing provision and the site has TPOs which may be affected by development. The site scored negatively against ET9 (heritage assets) and ET10 (local distinctiveness) as it is located in a Conservation Area and in an Area of Archaeological Importance.</p> <p>Positive scores were recorded against ET4 (traffic), ER1 (poverty) and ET5 (access) as the central location of the site may encourage sustainable travel due to close proximity to key services and facilities which may also help to reduce social exclusion.</p>
<p>IP054: Land between Old Cattle Market and Star Lane</p> <p>IP011b: Smart Street, Foundation Street</p>		<p>The sites would support the viability and vitality of centres due to the central location and it would directly support SA Objective ER3 (housing) by providing housing to meet community requirements. IP054 and part of IP011b scored negatively against SA Objective ET1 (air quality) as it is located close to an AQMA due to the potential increase in traffic from car use. IP011b and IP054 both scored negatively against ET3 (waste) as they would increase waste generated and cumulatively, negative effects against this SA Objective are expected with other developments in the IP One Area. IP054 is located within a Conservation Area. There are also listed buildings that could be affected by development at these sites and each of the sites is located within an Area of Archaeological Importance.</p> <p>Positive scores were recorded against ET4 (traffic), ER1 (poverty) and ET5 (access) as the central location of the site may encourage sustainable travel due to close proximity to key services and facilities which may also help to reduce social exclusion.</p>

Site Allocation	Location	Significant Findings
IP136: Silo College Street	IP One Area Central	The site would directly support ER3 (housing) by providing housing to meet housing requirements. The area along Star Lane, College Street, and Bridge Street is designated as AQMA and as a result of an increase in residents cumulatively in the immediate area and potential increase in traffic a negative score is recorded against ET1 and ET4. The site is located in Flood Zones 2 and 3 with a risk of flooding from the river Orwell. Positive scores are recorded with regards to health (HW1), quality of life (HW2), poverty and social exclusion (ER1), and vital town centres (ER5).
IP089: Waterworks Street IP012: Peter's Ice Cream IP043: Commercial Buildings and Jewish Burial Ground, Star Lane	IP One Area Central	<p>The sites would directly support ER3 (housing) by providing housing to meet housing requirements. Each of these sites is located close to an AQMA and the cumulative increase of people could generate traffic in the vicinity of Fore Street, Star Lane and Grimwade Street which would detract from SA Objective ET1 (air quality).</p> <p>The sites are on brownfield land and remediation measures of contaminated land (where appropriate) would help to improve soil resources (ET2). IP043 scored negatively against ET3 (waste) as the indicative capacity suggested a significant increase in waste if appropriate mitigation measures are not enforced. Listed buildings were found near to IP089 and IP043 (both in Conservation Areas) and each site is located within an Area of Archaeological Importance. The sites scored positively against ER6 (efficient patterns of movement) as the provision of housing close to existing/ future employment and shopping areas would encourage efficient patterns of movement and in the long term this could help to support economic growth.</p> <p>The sites also benefit SA Objective CL1 '<i>To maintain and improve access to education and skills for both young people and adults</i>' as the sites could contribute to improving access to the University Campus Suffolk.</p>
IP037 Island Site	IP One Area Central	<p>The site scored positively against ER3 '<i>To help meet the housing requirements for the whole community</i>' as it seeks to provide 271 homes however all of these dwellings are anticipated to be flats which may result in an oversupply of this type of housing in central Ipswich. The provision of this many homes would also increase private cars which would have a negative effect on air quality and climate change (ET1, ET4). The site would be developed on previously developed land and remediation measures would help to improve the soil resources (ET2). Waste production is likely to increase and due to the size of new development this is likely to be fairly significant. The site scored negatively against SA Objective CD1 '<i>To minimise potential opportunities for crime and anti-social behaviour</i>'. It is ranked in an area less deprived than those adjacent to it and in the short term may lead to an increase in crime levels. Although the site is located in central urban area, constraints have been identified with the potential increase in residents relating to the need to provide vehicular/pedestrian/cycle access via a new bridge. The site is located in flood zone 2 and 3, is surrounded by a designated county wildlife site and is close to an SPA south of the river Orwell therefore potential negative effects are associated with deterioration of air quality, water quality and disturbance to protected species. However, it should be noted that an Appropriate Assessment under the Habitats Regulations has been carried out to consider any potential impacts of the plan on the SPA, which does not identify potential impacts on the SPA from the Island Site redevelopment but potential harm to the SPA arises from dog walking on the foreshore by the SPA which disturbs birds. Therefore there may be increased potential impact from increased population and dog walking.</p>
IP098: Transco, south of Patteson	IP One Area	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The sites are located close to an AQMA and as a result of an increase in residents cumulatively in the immediate area; traffic may be generated in the vicinity of

Site Allocation	Location	Significant Findings
Road IP142: Land at Duke Street	Central	Duke Street, A1156 and Fore Street. The sites would benefit ET2 (soil resources) as they are on previously developed land which is likely to be contaminated and through remediation the soil resources could be improved. The relatively central location of the sites could help to encourage more sustainable modes of transport in some cases and could help to improve access to key services (ET4). The sites could indirectly benefit health and quality of life (HW1 and HW2) as they are close to Holywells and Alexandra Park which could help to support healthier lifestyles for residents. Potential positive effects are associated with improving access to education as the University Campus Suffolk is located close to the sites (CL1).
IP188: Websters Saleyard site, Dock Street IP039a: land between Gower Street and Gt Whip Street IP133: South of Felaw Street IP080: 240 Wherstead Road	IP One Area South West	<p>The sites would directly support ER3 (housing) by providing housing to meet housing requirements. IP188 and IP039a are located near an AQMA designated due to air pollution along Vernon Street and Bridge Street. Currently the sites are located near existing employment areas to the southeast which may result in reduced need to travel by private car. However, the increase of new residents may cause congestion and deteriorate air pollution to the north of the sites in the vicinity of Bridge Street, Star Lane and Commercial Road. (ET1). IP188 and IP039a are located close to key facilities such as schools, public transport, shops and parks and therefore offer benefits for SA Objective ET4 and ET5. IP188, IP133 and IP039a located in flood zones 2 and 3 and are prone to flooding from the river Orwell. IP080 is adjacent to flood zone 2 and 3. IP188 and IP039a are adjacent to listed buildings and IP188 falls entirely within a Conservation Area. IP133 is adjacent to a Conservation Area and development has the potential to affect the settings of historic/conservation sites</p> <p>The provision of housing close to existing employment areas and a range of community facilities could help to encourage efficient patterns of movement and would help to support the vitality and viability of town centres supporting SA Objectives ER5 and ER6. IP133 scored positively and negatively against SA Objective ET1 (air quality). The site is located a significant distance from any AQMAs however it is likely that residents from this development will contribute to increased traffic generated northbound in order to access shopping areas. The site scored negatively against SA Objective ET5 as potential access constraints exist and they are associated with negative effects on the local highway network at junction A137.</p>
IP031: Burrell Road		<p>The site is located near an AQMA designated due to air pollution along Vernon Street and Bridge Street. It is considered likely that residents from the new housing dwellings at IP031 could generate additional traffic eastbound along Burrell road to access shopping areas and community services in the town centre area via Bridge Street. However, the number of dwellings does not suggest a significant change from the baseline and the score against ET1 is neutral.</p> <p>IP031 is located in Flood Zones 2 or 3 being prone to flooding from the river Orwell. Part of IP031 falls within an Area of Archaeological Importance and adjacent to a Conservation Area in its most eastern parts. There are no Scheduled Monuments within or adjacent to the sites.</p> <p>Positive indirect effects are likely to occur with regards to the proximity of the site to Gippeswyk Park located to the west of the site allocation. The site is also near designated river paths and close to community facilities which may encourage residents to lead a healthy lifestyle.</p>
IP083: Banks of the river upriver from	IP One South	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. Due to the number of

Site Allocation	Location	Significant Findings
Princess Street IP015: West End Road Surface Car Park	West	<p>proposed homes, it is not considered that effects against air quality would be significant for these sites. The sites scored positively against SA Objective ET2 (soil resources) as they would be developed on brownfield land. Any remediation, if required, would serve to improve the soil resource. The sites scored positively against ET5 (access), and HW2 (quality of life) are located close to key facilities and would improve access to services whilst promoting healthy lifestyles and contributing to improving community participation. IP015 scored negatively against ET6 (climate change) as it is located within flood zone 2 and 3 and is at risk of flooding from the river Orwell. It also scored negatively against ET9 (heritage assets) as it is located close to a listed building and may have potential effects against its setting.</p>
IP004: Bus depot Sir Alf Ramsey Way IP096: Car park Hanford Road East IP006: Coop Warehouse, Pauls Road	IP One South West	<p>The sites would directly support ER3 (housing) by providing housing to meet housing requirements. IP004 and IP096 scored positively against SA Objective ET1 (air quality) as the area is served by public transport which may reduce the need for private car use. There are also a number of employment sites in close proximity to the site allocations which may encourage the implementation of car share schemes as well as encouraging more sustainable travel modes which would also help to support SA Objective ET4 (traffic). As each of the sites is located in central Ipswich, close to shopping areas, access to key services will be improved supporting SA Objective ET5. IP004 is located within flood zones 2 and 3 and is at risk of flooding from the river Orwell. IP096 is also located in an area prone to flooding. IP006 scored negatively against HW1 (health) as a result of the location close to railway lines which may have potential noise disturbance. Each of the sites scored positively against SA Objectives HW2 (quality of life) and ER5 (vital town centres) as the location of each site (close to shops, facilities and services) will help to encourage community participation whilst supporting town centre vitality and viability.</p>
IP032: King George V Field, Old Norwich Road IP005: Former Tooks Bakery, Old Norwich Road,	Ipswich North West	<p>The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The sites scored negatively against SA Objectives ET1 (air quality), ET3 (waste) and ET7 (water quality). The developments seek to provide housing and would cumulatively result in increased cars and people which would make a negative contribution to local air quality although this would be minor. Waste production and water use would increase as a result of more people.</p> <p>Positive scores were recorded against HW1 (health), HW2 (quality of life), and ER1 (poverty) as the sites will help to support health due to being located close to existing playing fields which will also help to encourage community participation and reduce social exclusion. The provision of homes may help to minimise opportunities for antisocial behaviour through secured by design measures.</p>

Site Allocation	Location	Significant Findings
<p>IP221 Flying Horse PH</p> <p>IP029: Land opposite 674-734 Bramford Rd</p> <p>IP165: Eastway Business Park, Europa Way</p> <p>IP033: Land at Bramford Rd (Stock Sites)</p>	Ipswich North West	<p>The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The sites scored negatively against ET1 (apart from IP221 which is small in size and effects will be negligible) as the sites seek to provide homes which would cumulatively increase the number of people and vehicles within the local area which could negatively affect air quality. The provision of homes with IP165, which is close to the A14 could increase traffic on A14 (and cumulatively with sites in the local area) however it is anticipated that the overall effect would be minor. The sites scored positively against ET5 (access) as each would contribute to improving access to key services. IP029, IP165 and IP033 currently contain vegetation or TPOs which could be affected by development. The sites could each contribute to enhancing local distinctiveness through careful design.</p>
<p>IP131: 488-496 Woodbridge Road / Milton Street</p>	Ipswich North East	<p>IP131 seeks to provide 13 new homes and is unlikely to have a significant effect on air quality due to the small scale of proposed development (ET1). The site is located close to a District Centre, two Local Centres and areas of open space. This may encourage sustainable travel locally (ET4 and ET5). Development of the site could contribute towards enhancing quality and local distinctiveness through modern design and the replacement of existing structures (ET10).</p> <p>The site is located close to protected playing fields which could make partial contributions towards improving health in the long term through encouraging people to go outdoors and promoting healthier lifestyles.</p> <p>High quality housing would also help to support the SA Objectives HW1 and HW2.</p>
<p>IP116 St Clements Hospital Grounds</p>	Ipswich North East	<p>The site would directly support ER3 (housing) by providing housing to meet housing requirements. The provision of 227 homes at IP116 would see a localised population increase. This may result in increased car use and subsequent increase in vehicle emissions, however it is located on at least two bus routes, close to Derby Road station and approximately 2km from work opportunities in the town centre and at Ransomes Europark.</p> <p>A positive score is recorded against ET5 (access) due to its proximity to a local centre and facilities. The site is located close to a District Centre and two Local Centres therefore access to these sites would be improved though on a minor scale. High quality housing provision would help to support quality of life and reduce social exclusion (HW1, HW2 and ER1). The use of secured by design measures would help to reduce opportunities for crime and anti-social behaviour. Due to the housing capacity, an increase in waste is considered likely and therefore scores negatively against SA Objective ET3 'To reduce waste'.</p>
<p>IP009: Victoria Nurseries, Westerfield Road</p>	Ipswich Central	<p>The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The sites seek to provide small scale housing development which would have a minor negative effect on local air quality and traffic. IP256 is adjacent to the</p>

Site Allocation	Location	Significant Findings
IP256: Artificial Hockey pitch, Ipswich Sports club subject to the requirements of policy DM28 being met		Northern Fringe Allocation so that there may be cumulative effects on traffic. There is one bus route in close proximity to the sites which could help to reduce negative effects on traffic. These sites would be developed on brownfield sites and remediation of land would help to improve the soil resources. There may be a drainage constraint at IP256 due to its previous use as a hockey pitch. Each of these proposed developments are located close to a large area of open space which could make contributions towards improving health in the long term through encouraging people to go outdoors and promoting healthier lifestyles. Therefore, it is considered that the effects will be positive. Both sites could contribute towards improving and enhancing development quality through careful design that integrates with its surroundings (ET10). IP256 could help to support local businesses as it is located close to a local centre and some minor benefits may be offered in encouraging investment.
IP105: Depot, Beaconsfield Road	Ipswich Central	The sites would directly support ER3 (housing) by providing housing to meet housing requirements. The site recorded a neutral score against SA Objectives ET1 (air quality), IP105 is currently in use therefore due to the proposed number of housing it is not considered that the increase on private cars as a result of development would significantly increase vehicular emissions. ET3 (waste) and ET4 (traffic) as provision of homes, cumulatively with proposed development in the immediate area, would lead to an increase in vehicles which could have effects on air quality and the environment though effects would be minor. The site would be developed on previously developed land and the remediation of contaminated land would help to improve the soil resources (ET2). The provision of homes close to Local Centre 35 would help to improve access (ER5) and would support the viability and vibrancy of these centres (ER6). The provision of decent housing close to areas of open space would also help to reduce social inclusion, promote healthier lifestyles and encourage community participation (HW1, HW2 and ER1). Through secured by design measures, housing provision could also help to increase natural surveillance and reduce opportunities for crime.

Policy SP3 Land with planning permission or awaiting a Section 106

Site Allocation	Location	Significant Findings
IP0150a: Land at Ravenswood	South East	Mixed scores are recorded against the SA Objectives. The increase in people and cars in the long term would have negative effects on air quality and the environment due to vehicle emissions and would increase waste production (ET1, ET3, ET4 and ET6). The site would support SA Objective HW1, HW2 and ER1 as they would improve the quality of housing stock and would contribute towards increasing the quality of life for residents. The improvement of housing stock within the area would aid economic regeneration which would raise living standards and help to minimise anti-social activity (CD1).
IP059b: Arclion House, Hadleigh Road IP168 Stoke Park Drive	South West	Mixed scores are recorded against the SA Objectives. The increase in people and cars in the long term would have negative effects on air quality and the environment due to vehicle emissions and would increase waste production (ET1, ET3, ET4 and ET6). The sites would be developed on previously developed land and the remediation of contaminated land would help to improve the soil resources (ET2). The sites would support SA Objective HW1, HW2 and ER1 as they would improve the quality of housing stock and would contribute towards increasing the quality of life for residents. The improvement of housing stock within

Site Allocation	Location	Significant Findings
		the area would aid economic regeneration which would raise living standards and help to minimise anti-social activity (CD1).
IP176: 7-9 Woodbridge Road	IP One Area Central	<p>The site directly supports SA Objective ER3, <i>'To help meet the housing requirements for the whole community'</i>. The site allocation scored positively against SA Objective ET4, <i>'To reduce the effects of traffic upon the environment'</i> as it is located in close proximity to the primary and secondary shopping areas and this may reduce the need to travel by private car.</p> <p>The site is not located in flood risk areas and there may be benefits for water if opportunities are sought to remediate some historical areas of contamination.</p> <p>The site scored positively against SA Objectives HW1, HW2, ER3 and ER6 as the provision of quality housing close to Christchurch Park and close to land allocated for community and leisure use could help to encourage healthier lifestyles, efficient patterns of movement and community participation.</p>
IP:253: Electric House, Lloyds Avenue	IP One Area Central	IP253 is located in central Ipswich and would be a conversion of an existing building. Due to the location of the site in the central urban area, access to facilities and shopping areas would be improved which would benefit SA Objective ET5. The site scored positively against HW2 (community participation) as they could encourage community participation through the provision of homes close to community and sports facilities.
IP074: Church and land at Upper Orwell Street IP264: 28-32 Tacket Street	IP One Area Central	These sites scored negatively against SA Objective ET1 (air quality) as they are located close to an AQMA and additional housing may result in increase in car use. In addition, there are potential negative effects associated with dust air and pollution during construction. IP074 has TPOs which may be affected by development. Positive scores are recorded against ET4 (traffic), ET5 (access), and ER1 (poverty) as the central location of the sites may encourage sustainable travel due to close proximity to key services and facilities which may also help to reduce social exclusion. The sites would support the viability and vitality of centres due to the central location and they would directly support SA Objective ER3 by providing housing to meet community requirements.
IP052: Land between Lower Orwell Street IP011a: Smart Street / Foundation Street	IP One Area Central	<p>Part of IP011a is located within an AQMA. IP052 may generate traffic on Star Lane and key roads which may negatively affect air quality (ET1). Each of the sites would be developed on previously developed land: remediation would benefit the soil resources (ET2).</p> <p>IP011b and IP052 both scored negatively against ET3 (waste) as they would increase waste generated and cumulatively, negative effects against this SA Objective are expected with other developments in the IP One Area. The sites scored positively against ET4, ET5, ER1, HW1 and HW2 as the central location of the sites may reduce car reliance and could improve health,</p>

Site Allocation	Location	Significant Findings
		<p>access to key services and facilities whilst supporting community participation and reducing social exclusion.</p> <p>IP011a is located adjacent to a Conservation Area. There are also listed buildings that could be affected by development at these sites and each of the sites is located within an Area of Archaeological Importance.</p>
<p>IP205: Burton's College Street</p> <p>IP206: Cranfields, College Street</p> <p>IP211: Regatta Quay, Key Street</p> <p>IP132: Former St Peter's Warehouse Site 4 Bridge Street</p>	<p>IP One Area Central</p>	<p>The site allocations will cumulatively lead to an increase in people due to housing development which will increase waste, cars and ultimately vehicle emissions which will have a negative effect on air quality (ET1). Whilst there are two bus stations and Ipswich Railway Station near the sites, the area is not currently served by local public transport in addition, the main shopping area is located north of the sites and existing employment areas are further south and west which may result in increased private car use and congestion issues therefore negative effects were recorded against ET4. It is noted that the Core Strategy is committed to extending the free shuttle bus, which may reduce impacts. IP206 and IP211 are located adjacent to the River Orwell County Wildlife Site and there are potential negative effects due to noise, air pollution and disturbance to species along the river all of which would detract from SA Objective ET8 (biodiversity). The sites are located on the waterfront and each scored negatively against SA Objective ET10 'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes' as there could potentially be negative effects to the local character of Neptune Marina and the quays in the area. The sites are located in flood zone 2 and 3 with a risk of flooding from the river Orwell. The provision of housing could have positive indirect effects on health and improving quality of life and could also help to reduce social exclusion through improving access in some cases to community facilities.</p>
<p>IP178: Island House, Duke Street</p> <p>IP226: Helena Road</p> <p>IP042: Land between Cliff Quay and Landseer Road</p>	<p>IP One Area South East</p>	<p>IP178 is located close to an AQMA and as a result of an increase in residents cumulatively in the immediate area; traffic may be generated in the vicinity of Duke Street, A1156 and Fore Street. Each of the sites would benefit ET2 as each site is on previously developed land and through remediation the soil resources could be improved. The relatively central location of sites could help to encourage more sustainable modes of transport in some cases and could help to improve access to key services (ET4). IP178, IP226 and western parts of IP042 fall within flood zone 2 and 3.</p> <p>IP042 is adjacent to a Holywells Park CWS and IP226 is in close proximity to the river Orwell to the west. One TPO is located within the northern parts of IP042 and an application for Tree Works may be required as each of these features has the potential to experience negative effects. Listing buildings are adjacent or near IP042. It should be noted that the redevelopment which has planning permission at IP042 has been allowed as enabling development to bring the listed brewery back into use and thereby secure its future. Therefore effects are assessed as positive.</p>
<p>IP200: Griffin Wharf, Bath Street</p>	<p>IP One Area South West</p>	<p>The site scored negatively against SA Objective ET1 (air quality). The site is located a significant distance from any AQMAs however it is likely that residents from the development will contribute to increased traffic generated northbound in order to access shopping areas. The site scored negatively against SA Objective ET5 as potential access constraints exist and they are associated with negative effects on the local highway network at junction A137. The site is located in flood zones 2 and 3 and is prone to flooding from the river Orwell. IP200 is located adjacent to a CWS and the indicative capacity at this site suggests potential negative effects on the designated site associated with noise, pollution and disturbance to species. The provision of housing close to existing employment areas and a range of community facilities could help to encourage efficient patterns of</p>

Site Allocation	Location	Significant Findings
		<p>movement and would help to support the vitality and viability of town centres supporting SA Objectives ER5 and ER6. Development would help to support town centre viability as it would in the long term provide an increase in potential users of facilities and services.</p>
<p>IP169: 23-25 Burrell Road IP047 Land at Commercial Road</p>	<p>IP One Area South West</p>	<p>The sites are located near the AQMA which is designated due to air pollution along Vernon Street and Bridge Street. IP047 will contribute to an increase of new residents in the area as it is anticipated that 129 new homes will be built. As a result of a significant number of new residents, the traffic is likely to increase on key roads adjacent to the site albeit to a small extent. It is considered likely that residents from the new housing dwellings at IP031 and IP169 could generate additional traffic eastbound along Burrell road to access shopping areas and community services in the town centre area via Bridge Street. However, the number of dwellings does not suggest a significant change from the baseline. IP169 is located close to parks, schools, facilities and services all of which would improve access to schools, key services and would help to encourage community engagement and improve health, supporting several SA Objectives. Allocating housing at IP169 and IP047 would help to meet local housing needs whilst providing decent homes close to facilities which would help to improve quality of life and human health and would contribute towards reducing social exclusion supporting SA Objectives HW1, HW2 and ER1.</p> <p>IP047 is located on previously developed and potentially contaminated land. Remediation of this land would help to improve the soil resources and would benefit SA Objective ET2.</p>
<p>IP088: 79 Cauldwell Hall Road IP109: R/O Jupiter Road and Reading Room</p>	<p>Ipswich North East</p>	<p>IP109 seeks to provide 13 homes and IP088 seeks to provide 16 homes and for this reason effects on air quality and climate change have been recorded as neutral due to negligible impacts as a result of development. Positive scores were recorded against ET2 as development would allow for the remediation of contaminated land. The sites are located close to a District Centre and two Local Centres therefore access to these sites would be improved on a minor scale. High quality housing provision would help to support quality of life and reduce social exclusion (HW1, HW2 and ER1). The use of secured by design measures would help to reduce opportunities for crime and anti-social behaviour.</p>
<p>IP090: Europa Way</p>	<p>Ipswich North West</p>	<p>The site scored negatively against ET1 (air quality) as it seeks to provide homes which would cumulatively increase the number of people and vehicles within the local area and negatively affect air quality. There is a proposed District Centre within this site which would directly improve access to key services (ET5). The site contains vegetation and TPOs which could be affected by development. The site could contribute to enhancing local distinctiveness as well as reducing crime opportunities through sensitive design and secured by design measures.</p>
<p>IP129: BT Depot, Woodbridge Road IP161: 2 Park Road</p>	<p>Ipswich North</p>	<p>The site allocations would also directly support the provision of housing to meet local needs (ER3). Negative effects were recorded for IP129 against ET3 (waste), ET4 (traffic) and ET6 (climate change) as the sites would cumulatively result in an increase in the local population and private cars which would have a negative effect on climate change though these effects would be minor. Waste production would also increase though waste reduction initiatives where possible would help to reduce waste. Positive scores are recorded for IP129 against SA Objective CD1, ER5, ER6 and ER7 as the development of homes would help to minimise potential for crime and anti-social behaviour though secured by design measures and natural surveillance.</p>

Site Allocation	Location	Significant Findings
IP246: 158-160 London Road IP135: 112-116 Bramford Road IP130: South of South Street	Ipswich North West	The site allocations scored neutrally against SA Objectives ET1 (air quality) and ET4 (traffic) as the size of each size does not suggest a significant increase in residents in the area. IP135 is located in an area with potentially difficult access which may have a minor localised effect on traffic. The sites would be developed on PDL and the remediation of contaminated land would help to improve the soil resources (ET2). The provision of homes close to Local Centre 35 and District Centre 7 would help to improve access and would support the viability and vibrancy of these centres (ER5). The provision of housing close to areas of open space would also help to reduce social inclusion, promote healthier lifestyles and encourage community participation (HW1, HW2 and ER1). Through secured by design measures, housing provision could also help to increase natural surveillance and reduce opportunities for crime.

Policy SP5 Land allocated for employment use

Site Allocation	Location	Significant Findings
IP147: Land between railway junction and Hadleigh Road	South West	The site allocation would result in negative effects against five of the environmental SA Objectives. It would result in a daily increase of workers and residents in the long term causing increased emissions and effects to the environment. Development would directly support SA Objective ER2, <i>'To offer everybody the opportunity for rewarding and satisfying employment'</i> , by providing employment during construction and during operation. IP147 would help to attract investment, create jobs and could help to encourage efficient patterns of movement providing increased presence within local centres. It would address job provision, which would help to increase quality of life supporting SA Objectives HW1, HW2, ER2, ER4, ER5, ER6 and ER7.
IP146: Ransomes Europark East	South East	IP146 would create employment areas at three locations which would result in increase of traffic and negative effect on air quality (ET1) however public transport could mitigate some of this increase. There are bus routes located nearby the Ransomes Europark with connections close to the Makro store. Provision of employment land would attract investment, in the long term would create jobs and increase wages and standards of living for the local population which would serve to improve quality of life, and reduce social exclusion. IP146 is presently on an area of unused fields. Development on this area could cause detriment to the soil resource. It would increase waste and would have the potential to affect protected species which would detract from SA Objective ET3. The removal of existing fields and grassland and replacement hard standing would increase runoff and decrease ground absorption.
IP067: Former British Energy Site	South East	IP067, IP058 and IP099 each had mixed scores against the SA Objectives. The area around IP067 and IP099 is presently

Site Allocation	Location	Significant Findings
<p>IP058: Former Volvo Site, Raeburn Road South</p> <p>IP099: Part of former Volvo Site, Raeburn Road South</p>		<p>affected by odour from the nearby sewage works which has been identified as an existing barrier to development. Each of these proposals scored positively against SA Objectives ET2 (soil resources). IP058 is presently a County Wildlife Site and development here would seek to promote the wildlife associated with its status. The removal of existing structures and hard standing at the sites (IP067 former British energy site, IP099 and IP058 both former Volvo sites) would decrease the potential run off by increasing ground absorption. The employment sites would help to attract inward investment and would provide the opportunity for rewarding employment, sustainable economic growth and would help to increase living standards which could support quality of life and the vitality and viability of centres (ET5, HW2, ER2, ER4, ER5, ER6 and ER7).</p>
<p>IP152: Airport Farm Kennels, north of the A14</p> <p>IP150c Land south of Ravenswood</p>	South East	<p>The sites are likely to increase traffic and negatively affect air quality though this could be mitigated by increasing public transport provision. These site allocations would directly support economic SA Objectives by offering employment opportunities, support efficient patterns of movement and inward investment (ER2, ER6 and ER7). The sites would also help to attract people into the local area which would help to support local centres and businesses to achieve sustainable levels of growth.</p>
<p>IP035: Key Street / Star Lane / Burtens (St. Peter Port)</p>		<p>The area along Star Lane, College Street and Bridge Street is designated as an AQMA and this site has the potential to contribute to increasing vehicles particularly from users of the office or hotel buildings which may negatively affect air quality (ET1 and ET4). The site is located in flood zone 2 and 3 and at risk of flooding from the river Orwell. However, as mitigation, Policy DM4 from the Core Strategy addresses flood risk. The site would support SA Objective ER2 <i>'To offer everybody the opportunity for rewarding and satisfying employment'</i> as it is sought to be used for employment which in the long term would provide employment opportunities. The site would also support the viability and vitality of the town centre as it would help to meet demands of growing numbers of residents (ER5). The site would be developed on previously developed land and remediation measures would help to improve the soil resources (ET2). Waste production is likely to increase on the whole due to the scale of development.</p>
<p>IP037: Island site</p>	IP One Area Central	<p>The site would be developed on brownfield land and remediation measures would help to improve the soil resources (ET2). The site allocation scores positively against ER2 (employment) and ER (5) as it will provide employment opportunities and will also support the viability and vitality of the town centre. The site is located in flood zone 2 and 3, is surrounded by a designated county wildlife site and is close to an SPA south of the river Orwell therefore potential negative effects are associated with deterioration of air quality, water quality and disturbance to protected species. However, it should be noted that an Appropriate Assessment under the Habitats Regulations has been carried out to consider any potential impacts of the plan on the SPA, which does not identify potential impacts on the SPA from the Island Site redevelopment. Waste production and crime levels could potentially increase due to the size of new development.</p>
<p>IP094: Land to rear of Grafton House</p>	IP One Area South West	<p>This site is located on previously developed land and possible contamination has been identified. Remediation of this land would help to improve the soil resources (ET2). The site is served by public transport. In the long term the development is likely to result in increase of waste production ET3 <i>'To reduce waste'</i>. The site would directly support SA Objective ER2 as it would provide employment use land. It would also help to achieve levels of sustainable prosperity and economic growth (ER4). The provision of employment in the long term may help to reduce social exclusion and poverty and could help to achieve SA Objective HW2 cumulatively with other development including housing and open space in close proximity to this site.</p>

Site Allocation	Location	Significant Findings
IP004: Bus depot Sir Alf Ramsey Way IP051: Old Cattle Market Portman Road	IP One Area South West	The sites are located in areas served by public transport which may reduce the need for private car use, although IP051 also potentially includes car parking which may support car use. There are also a number of employment sites in close proximity which may encourage the implementation of car share schemes as well as more sustainable travel modes supporting directly SA Objective ET4. As each of the sites is located in central Ipswich, close to shopping areas access to key services will be improved supporting SA Objective ET5. IP004 and IP096 are located within flood zones 2 and 3 and are at risk of flooding from the river Orwell. The sites will help to support SA Objective ER2 <i>'To offer everybody the opportunity for rewarding and satisfying employment'</i> , by providing employment opportunities during construction and operational phases. The sites scored positively against SA Objectives HW1, HW2 and ER5 as the location of each of the sites close to shops, facilities and services will help to encourage community participation whilst supporting town centre vitality and viability.
IP140: Land north of Whitton Lane	Ipswich North West	The site scored negatively against ET2 as it would result in the direct loss of greenfield land. The employment area would directly support the provision of employment opportunities (ER2) and this could also help to attract inward investment and support economic growth (ET5 and ER7). The site scored negatively against SA Objective ET7 (water quality) and ET8 (biodiversity) as it would result in loss of greenfield land which could increase surface runoff. The site could contain hedgerows and areas of significance for wild life which may also be lost to development.
IP011b, IP015, IP043, IP052 and IP054		These site allocations have already been assessed previously in the tables above and the assessments are not repeated in this table.

Policy SP6 Land allocated and protected as open space

Site Allocation	Location	Significant Findings
IP263: West of Bridge Street	IP One Area Central	This site may contribute partially to achieving SA Objective ET1 <i>'To improve air quality'</i> with the provision of 0.17ha of open space at the Waterfront. The site would be developed on brownfield land and remediation would improve the soil resources. SA Objective ET8 (biodiversity) would receive some benefits as the site is allocated for open space which may also help to improve health and quality of life as well as social inclusion and community participation (HW1, HW2, ER1 and ER1). Habitat creation and enhancement could also benefit landscape and townscape at this site (ET10).
IP037: Island Site	IP One Area Central	The site scored negatively against SA Objective CD1 (crime). It is ranked as an area less deprived when compared to those adjacent to it and in the short term may lead to an increase in crime levels. Positive and negative effects were recorded against SA Objective ET5 as constraints are identified with the potential increase in residents relating to the need to provide vehicular/pedestrian/cycle access via a new bridge. The site is located in flood zone 2 and 3 and providing open space would have a positive impact on flood risk as the area has potential to absorb flood waters. However, it should be noted that the open space would be within developments, which has the potential to increase flood risk. The site is surrounded by a designated county wildlife site and is close to an SPA south of the river Orwell therefore potential negative effects are associated with disturbance to

Site Allocation	Location	Significant Findings
		protected birds. Provision of open space would benefit human health and would encourage community participation benefitting SA Objectives HW1 and HW2.
IP142: Land at Duke Street	IP One Area South East	The site is located close to an AQMA and the provision of open space would help improve local air quality. The site would benefit ET2 as it is on previously developed land which is likely to be contaminated and through remediation the soil resources could be improved. The relatively central location of the site could help to encourage more sustainable modes of transport in some cases and could help to improve access to key services (ET4). This site could directly benefit health and quality of life (HW1 and HW2) with the provision of open space and it is also located close to Holywells and Alexandra Park which could further promote healthier lifestyles. Potential positive effects are associated with improving access to education as the University Campus Suffolk is located close to the site (CL1).
IP083: Banks of the river upriver from Princes Street	IP One Area South West	The provision of open space could help to encourage people to walk and cycle more which may have a positive effect on air quality as well as human health, wellbeing and quality of life, supporting SA Objectives ET1, ET4, ET5, ET6, HW1, HW2 and ER6. Retaining open space at this site could also benefit ET8 by potentially supporting wildlife and it would help to reduce runoff in the floodplain supporting SA Objective ET7.
IP029 Land opposite 674-734 Bramford Way IP033 Land at Bramford Road (Stocks Site)	Ipswich South West	The provision of open space with IP029 and IP033 will help improve local air quality. The sites scored positively against ET5 (access) as they each would contribute to improving access to key services and IP029 and IP033 would provide open space which would directly serve housing development at these sites. IP029 and IP033 currently contain vegetation and TPOs which could be affected by development. The sites could contribute to enhancing local distinctiveness through careful design.
IP032, IP048, IP116 and IP061	North West Central North East South West	These sites have been assessed previously. Open spaces are likely to have potential positive impacts on health, air quality and biodiversity.

Policy SP7: Land allocated for leisure uses or community facilities

Site Allocation	Location	Significant Findings
IP150b: Land south of Ravenswood	South East	Development of a sports facility at IP150b would lead to an increase in movement which may have an effect on air quality and the environment (ET1). IP150b would benefit HW1 (health), HW2 (quality of life) and ER1 (poverty) as the development of sports facilities would provide

Site Allocation	Location	Significant Findings
		means for promoting healthier lifestyles and encouraging community participation whilst helping to reduce social exclusion. Development at these sites would help to attract inward investment which could benefit surrounding areas by sustaining local centres and improving access to facilities (ET5, ER5 and ER7).
IP260: The Former Odeon Cinema	IP One Area Central	The site is allocated for leisure uses/community facility and an increase in traffic would be expected though this would be determined by car parking provision. The Odeon is an existing vacant building which may be reused. As the site is allocated for leisure use there is potential for waste production to increase. The site scored negatively against SA Objective ET9, <i>'To conserve and enhance the historic environment, heritage assets and their settings'</i> as it is located at close proximity to Listed Buildings and development could potentially affect these heritage assets.
IP258: Land at University Campus Suffolk as part of the Education Quarter	IP One Area Central	The site is located close to an AQMA and the proposed use of land as a new primary school would result in a daily increase in cars at peak times which may have an effect on air quality (ET1), although may result in reduced car use overall should it provide an opportunity for local residents to walk to school. There is a TPO near the site which may require an application for Tree Works. Community participation will be encouraged through the allocation of the site in central urban area near a wide range of facilities (e.g. parks, public transport infrastructure, university campus, etc.). The site will also contribute to the achievement of SA objective HW2 through the provision of a new primary school. The site would also directly support SA Objective CL1 <i>'To maintain and improve access to education and skills for young people and adults'</i> as it would provide a new primary school in a central accessible location.
IP005: Former Tooks Bakery, Old Norwich Rd	Ipswich South West	The site seeks to provide a health centre alongside its residential allocation. Negative scores were recorded against SA Objectives ET1 (air quality), ET3 (waste) and ET7 (water quality). An increase in cars cumulatively with other development in the immediate area could result in a negative contribution to local air quality. Waste production and water use would increase with new development. The site scored positively against HW1, HW2, and ER1 as it will be providing a health centre which will help to support the health of local residents. It is also located close to existing playing fields which will also help to encourage community participation and reduce social exclusion.
IP010a Co-op Depot, Felixstowe Road	South East	This site has been assessed previously in the above tables.

Policy SP8 Orwell Country Park Extension

Site Allocation	Location	Significant Findings
IP149 Pond Hall Carr and Farm	South East	<p>The extension to the country park proposed at IP149 could offer benefits to SA Objective ET8, 'To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs', as it could help to enhance habitats within the area. The site is bordered by the internationally designated SPA/Ramsar and nationally designated SSSI. Opportunities to develop IP149 could also have a positive effect on these sites through appropriate visitor management measures. The Habitats Regulations Assessment (2014) has concluded that Policy SP8, regarding Site IP149, will not result in a likely significant effect upon any European site. IP149 would benefit HW1 (health), HW2 (quality of life) and ER1 (poverty) as the extending the existing country park would provide means for promoting healthier lifestyles and encouraging community participation whilst helping to reduce social exclusion. Development at these sites would help to attract inward investment which could benefit surrounding areas by sustaining local centres and improving access to facilities (ET5, ER5 and ER7).</p> <p>IP149 would also particularly benefit SA Objective ET10, '<i>To conserve and enhance quality ad local distinctiveness of landscapes and townscapes</i>'.</p>

Policy SP9 Safeguarding land on development sites for transport infrastructure

Site Allocation	Location	Significant Findings
IP010a/b, IP029, IP059a and IP037	South West IP-One area	These have been assessed previously in the above tables.

Recommendations for mitigation measures

4.3.3 Recommendations to mitigate the significant negative effects include:

- Provision of more frequent public transport to meet increased demand where necessary to ease traffic and address congestion/air quality issues. Where possible public transport links should be provided within 400m of development.
- The use of sustainable modes of transport should also be encouraged through improvements to the pedestrian and cycling infrastructure.
- Provision of green space will improve increase permeability and connectivity.
- Sensitive development on account of the presence of TPOs.
- Contaminated land remediation where appropriate will help to improve the soil resource. The development on brownfield sites should be encouraged where appropriate.
- Recycling schemes should be promoted to reduce impact of additional waste.
- Proposal should include a desktop ecological assessment to determine the need for detailed survey and appropriate site specific mitigation.
- Surveys and mitigation for bird species should be undertaken at sites containing vegetation prior to construction works. The inclusion of soft landscaping would offer minor benefits to biodiversity.
- Soft landscaping will mitigate partially impacts to loss of greenfield land.
- Although the implementation of the tidal barrier and raised defences will raise the level of protection, there is still a residual risk of flooding by either failure of new defences or overtopping in extreme events. Development should be encouraged to use SuDS to manage runoff, further reduce flood risk and help protect groundwater and surface water quality.
- Appropriate design of buildings should be required (through the use of traditional or sympathetic building materials and techniques) to complement and enhance existing designated buildings and local distinctiveness.
- Secured by design principles should be considered to help deter anti-social behaviour.
- Mitigation measures would be required if any archaeological remains are discovered to avoid damage to the heritage assets. Where appropriate mitigation measures can include completion of a licensed excavation and recording of remains before development commences.
- New developments for employment use should meet BREEAM standards.
- New residential developments should meet Code for Sustainable Homes standards.
- Mitigation should also be implemented to encourage measures to reduce potable demand, use of rain water harvesting and grey water recycling systems to reduce domestic water use.

These are identified against the relevant site allocations/policies where appropriate.

4.4 Appraisal of IP-One Policies

4.4.1 The IP-One Policies define areas for development (Education Quarter, the Waterfront, and Ipswich Village), define routes for transport proposals and manage car parking provision in the town centre. The IP- One policies include the following:

- **SP10 Retail Site Allocations**
- **SP11 Ipswich Waterfront**
- **SP12 Education Quarter**
- **SP13 Ipswich Village**
- **SP14 Arts, Culture and Tourism**
- **SP15 Improving Pedestrian and cycle routes**
- **SP16 Transport Proposals in IP-One**
- **SP17 Town Centre Car Parking**

4.4.2 The detailed matrices are presented in Appendix E. The findings of the assessment are summarised below.

SP10 Retail Site Allocations

4.4.3 This policy relates to land at Westgate, allocated for A1 retail-led mixed use development, which could include other uses provided the predominantly retail use is delivered. This policy is likely to have both positive and negative impacts on air quality (ET1), traffic (ET4) and climate change (ER6). Concentration of uses in the town centre likely to be beneficial in terms of reducing the need for/distance of journeys although there may be effects on AQMAs and air quality in the town centre itself.

4.4.4 Policy SP10 will result in an increase in waste from the Westgate retail allocation due to its proposed use.

4.4.5 Policy SP10 promotes retail uses within the town centre, which are accessible by public transport. This would help reduce the use of private cars and greenhouse emissions. However, it may result in increased use of private cars from outside Ipswich and this would increase greenhouse emissions. As such, this policy scored both positively and negatively against ET6.

4.4.6 The policy provides for retail and mixed use in the town centre and as such, the policy has scored positively against SA Objectives ER1, ER7, ER5, ER4, and ER2. Although fairly tenuous SP10 commitment to largely focussing employment development within the accessible town centre may help to encourage healthy lifestyles (HW1).

4.4.7 This policy is expected to have neutral effects on HW2, ET2, CL1, and ET7. Although Policy SP10 seeks residential-led scheme on the eastern half of the site, it is considered that the overall contribution to ER3 will be neutral.

4.4.8 Regarding ET9 and ET10, Westgate is within an area of archaeological importance but the policy relates to previously developed land and any impact on archaeological resources is unlikely. However, the Mint Quarter, to which SP10 applies, is within a Conservation Area and potential negative effects on heritage assets are recorded.

SP11 Ipswich Waterfront

4.4.9 Policy SP11 relates to the Waterfront, which remains the focus for regeneration within central Ipswich to create mixed use neighbourhoods – residential, community, office, arts, culture and tourism. Much of the 80ha area is developed but a few key sites remain to be redeveloped.

This policy may result in an increased use of private cars by future residents who may travel to areas outside Ipswich and by people that may be travelling to these cultural facilities and employment uses from outside Ipswich and this may negatively impact air quality. However, the area is accessible by foot, particularly for residents in the town centre, and providing a mix of uses alongside the existing mix of uses in the town centre would provide opportunities for walking/cycling. This policy scores positively and negatively against ET1, ET4 and ET6.

4.4.10 The proposed developments in SP11 could potentially lead to an increase in waste production within the Waterfront. This policy scores negatively against ET3 (waste).

4.4.11 This policy scores positively against ET5. It would help reduce dependence on the private car through proposals for new housing, which would be accessible to the town centre. Policy SP11 relates to the Waterfront, which is adjacent to the River Orwell and the Neptune Marina and is within Flood Zones 2 and 3. Although the construction of the tidal barrier and raised defences would raise the level of protection, there is still a residual risk of flooding by either failure of the new defences, or overtopping in extreme events. It scores negatively against ET7 as developments may increase the risk of flooding.

4.4.12 Policy SP11 relates to the Waterfront Area, which is adjacent to the River Orwell where developments have potential to have a short-term negative impact on water species and habitats from construction activities. There may be temporary disturbance to species but the overall effect in the long term is not significant.

Policy SP12 – Education Quarter

4.4.13 SP12 focuses development for education and ancillary uses, such as student accommodation or offices within the Education Quarter. This policy is likely to have a positive impact within the quarter and reduce the number of trips by private car since the developments would be within the Suffolk New College Campus and the University Campus Suffolk. This policy scores positively against ET1, ET4 and ER6. Developments proposed within SP12 could potentially lead to an increase in waste within the Education Quarter and has a negative score against ET3. SP12 directly supports the SA Objective ET5 and highlights the important serving role of the Education Quarter as an area to provide key service needs for the academic institutions and the local residents.

4.4.14 This policy scores both positively and negatively against ET6. It would help reduce dependence on the private car by supporting student accommodation accessible to the University Campus Suffolk and the Suffolk New College. However, the policy applies to areas within flood zones and any new developments would need to take into account flood risk at the design stage.

4.4.15 Policy SP12 scores negatively against ET7 since the Education Quarter is located adjacent to the Neptune Wharf and this area is within Flood Zones 2 and 3. A section of the University Quarter (open space and car parks) is adjacent to the Neptune Marina and therefore potential negative impacts are identified with regard to biodiversity. However, the University Quarter has some mature trees and is adjacent to Alexandra Park, which may be affected by new developments. A negative score against ET8 has been recorded.

4.4.16 This policy scores negatively against ET9 and ET10. There are a number of heritage assets within and in the vicinity of the Education Quarter, therefore there is potential for new developments relating to Policy SP12 to have an impact on the listed buildings/scheduled monuments and their settings during construction periods. The Education Quarter lies outside the Conservation Areas. It adjoins the Central and St Helens Conservation Areas. There is potential for new developments to impact heritage assets. However, it is accepted that Core Strategy Policies CS4 and DM9 would offer some protection.

- 4.4.17 The policy scores positively against the following SA Objectives: HW1, HW2, ER1, ER2, ER3, ER4, ER5, ER6, and CL1. SP12 seeks provision of residential accommodation which may have indirect health benefits from good quality housing. SP12 seeks to provide residential and educational ancillary uses, which would contribute to the quality of life of students and the local community. SP12 would make some contribution to the SA Objective through providing the educational community with key services and facilities which would support the reduction of social exclusion. This policy would also contribute to SA Objectives by seeking to provide employment in developments relating to educational ancillary uses and residential accommodation. It will support the economic growth, the vitality of the town centre and the Education Quarter and would encourage investment. By providing for ancillary services, it supports access to education.
- 4.4.18 This policy has both negative and positive scores against CD1. It is possible that development within, and overall regeneration of the Education Quarter would increase natural surveillance and potentially contribute to a reduction in crime levels. However, there may be increased opportunities for crime within the town centre due to increase in population and businesses.
- 4.4.19 This policy scores neutrally against SA Objective ET2.

Policy SP13 Ipswich Village

- 4.4.20 Policy SP13 relates to Ipswich Village, which remains the focus for regeneration within central Ipswich replacing older industries with office development. SP13 may result in an increased use of private cars by people that may be travelling to employment areas from outside Ipswich. Increased traffic may negatively impact air quality and climate change. However, the area is accessible by public transport. This policy scores positively and negatively against ET1, ET4 and ET6.
- 4.4.21 SP11 could potentially lead to an increase in waste production as a result of business and office operational activities. This policy scores negatively against ET3 (waste).
- 4.4.22 Policy SP13 scores positively against ET5. This policy seeks to provide offices/leisure facilities in the west part of the town centre. The policy would contribute partially towards minimising traffic levels within the Borough as they would be located within the town centre, where sustainable modes of transport are available.
- 4.4.23 Policy SP13 relates to Ipswich Village, the majority of which is located within Flood Zone 2 and 3. Although the construction of the tidal barrier and raised defences would raise the level of protection, there is still a residual risk of flooding by either failure of the new defences, or overtopping in extreme events.
- 4.4.24 There are no heritage assets in the vicinity of Ipswich Village; therefore no impacts are recorded with regard to SA Objective ET9. Policy SP13 would make some contributions to SA Objectives HW2, ER1, ER2, ER3, ER4, ER5, ER6, and ER7 through provision of adequate employment areas in the town centre easily accessible to residents and supporting mixed-used neighbourhood of residential use, open space and main town centre uses.

Policy SP14 – Arts, Culture and Tourism

- 4.4.25 Policy SP14 supports the retention and enhancement of existing facilities, providing for arts, culture and tourism activities as well as the creation of new facilities including visitor accommodation within the town centre boundary and the Waterfront area. The facilities will be located in the town centre, which is well served by public transport which may reduce impact on air quality. However, there may also be those who would travel by private car to these facilities. This policy scores both positively and negatively against SA Objectives ET1, ET4 and ET6.

- 4.4.26 This policy scores negatively against ET3. The development of cultural facilities and visitor accommodation as proposed in SP14 could also lead to an increase in waste within the Waterfront and within the town centre.
- 4.4.27 This policy directly supports the SA Objective ET5 as it seeks to provide arts, cultural and tourism services to the surrounding population and the wider area around Ipswich. The Waterfront, where this policy applies is within a flood risk zone. For this reason, the policy scores negatively against ET7.
- 4.4.28 Policy SP14 proposes arts, cultural and tourism facilities in the town centre and visitor accommodation in the Waterfront, where developments have potential to impact freshwater species and habitats. A negative score is recorded against ET8.
- 4.4.29 Policy SP14 applies to the town centre, where a number of listed buildings and scheduled monuments may be directly affected by new developments relating to arts, culture and tourism. Most of the town centre is within the Central Conservation Area, so there is potential for new developments to impact historical sites. SP14 relate to Waterfront and the town centre which are within Conservation Areas – Central and Wet Dock. Depending on the design of the new developments, there is potential to impact townscape. This policy scores negatively against ET9 and ET10.
- 4.4.30 This policy scores positively against HW2, ER1, ER2, ER3, ER4, ER5, ER6, ER7, and CL1. SP14 seeks to provide arts, tourism and cultural facilities within the Waterfront and the town centre. New developments will contribute to the vitality and vibrancy of these areas and help to improve quality of life of residents as well as contribute towards encouraging community participation. The arts and cultural facilities would also support the reduction of social exclusion. There will be contribution to employment opportunities from the arts, culture and tourism uses. This policy will support economic growth and may encourage investment in the borough.
- 4.4.31 This policy has both negative and positive scores against CD1. It is possible that development of such uses which may attract people into the area in the evenings and at weekends may increase natural surveillance and potentially contribute to a reduction in crime levels. However, there may be increased opportunities for crime within the town centre due to increase in activity.
- 4.4.32 This policy scores neutrally against SA Objectives HW1, ET2 and ER3 and CL1.

Policy SP15 – Improving Pedestrian and Cycle routes

- 4.4.33 SP15 supports improvements to pedestrian and cycle routes within the town centre and those linking the town centres to residential areas and beyond, which is likely to contribute to improved air quality, reduction of car use and efficient movement of traffic. Policy SP15 would improve access to services within the town centre and also the wider area. The provision of cycling and walking routes may reduce car use. It scores positively against ET1, ET4, ET5 and ET6.
- 4.4.34 This policy scores positively against HW1. By improving pedestrian and cycle routes SP15 may encourage people to cycle or walk and thus offering some direct health benefits.
- 4.4.35 SP15 supports the SA Objective ER5 by making the town centre accessible by cycling and walking. This increased accessibility would attract more people to visit the town centre and contribute to its vitality in the long term.
- 4.4.36 This policy scored neutrally against ET2, ET3, ET7, ET8, ET9, ET10, HW2, ER2, ER3, ER4, ER7, and CD1,

Policy SP16 – Transport Proposals in IP-One

- 4.4.37 SP16 safeguards provision of a new Wet Dock Crossing. The Star Lane Gyratory, which is a key east-west corridor, causes congestion and poor air quality as well as a barrier to pedestrian movement between the Waterfront and the Central Shopping Area. This policy is likely to have positive on ET1, ET4 and ET6 since it may reduce cars on the gyratory.
- 4.4.38 Policy SP16 would provide a pedestrian crossing between the Waterfront and Central Shopping Area, which would improve access to services by both the Waterfront residents and those in the Central Shopping Area. This policy scores positively against ET5.
- 4.4.39 Policy SP16 will improve access within the Waterfront, the town centre and areas beyond, which will help support the vitality of the town centre and ER5.
- 4.4.40 This policy scored neutrally against ET2, ET3, ET7, ET8, ET9, ET10, HW1, HW2, ER1, ER2, ER3, ER4, ER7, CL1 and CD1.

Policy SP17 – Town Centre Car Parking

- 4.4.41 SP17 provides for a Central Car Parking Core within Ipswich town centre. Car parks are proposed in the Mint Quarter, Shed No 8 Orwell Quay and Turret Lane, which are already existing car parks within or close to Air Quality Management Areas. The policy states that it supports the Travel Ipswich measures and encourages the use of sustainable modes of transport. However, the increase in car parking spaces in the town centre would have an adverse effect on air quality, traffic and efficient movement of traffic. This policy scores negatively against ET1, ET4 and ET6.
- 4.4.42 SP17 would improve access to services within the town centre from within the borough and surrounding areas as people can drive into the centre. It therefore scores positively against ET5. Providing additional parking spaces within the town centre would increase greenhouse emissions. This policy therefore scores negatively against ET6. Car parks south and southwest of the town centre are within Flood Zones 2 and 3.
- 4.4.43 Policy SP17 may have a negative impact on heritage assets as there are listed buildings in the vicinity of the Crown Street, Mint Quarter, and Turret Lane, where car parks are proposed. Shed 8 Orwell Quay and Turret Lane are located in an Area of Archaeological Importance. Policy SP17 supports the development of car parks, which have the potential to impact the character of Conservation Areas and has scored negatively against ET10 (Shed 8 Orwell Quay is adjacent to a Conservation Area; Turret Lane is within a Conservation Area). Depending on the design of the car parks, these have potential to impact the character of the Conservation Areas.
- 4.4.44 Car parks would encourage people from within and outside the borough to drive into the town centre, which would contribute to the vitality of the town centre. SP17 recognises that providing sufficient car parking in the town centre may support the town centre economy and encourage investments. This policy scores positively against ER5 and ER7.
- 4.4.45 This policy scored neutrally against ET2, ET3, ET7, ET8, HW1, ER1, ER2, ER3, ER4, CL1, and CD1.

Recommendations

- 4.4.46 To improve the sustainability of these policies, the following are recommended:
- Although policy SP17 lists the benefits of promoting sustainable transport choices, it is recommended that it includes details on how it supports sustainable modes of transport within IP-One.

- It is recommended that Policies should include reference to the provision of adequate waste facilities and where possible recycling facilities within the Central Shopping Area, Westgate and district centres.
- It is recommended that these policies include reference to ensuring that new development does not exacerbate current flood risk issues in the area and the use of SuDS, wherever practicable.
- It is recommended that Policies should include a reference to the design of new developments to be sensitive to Conservation Area characters and the protection of heritage assets.
- It is recommended that secured by design principles are incorporated into new development to reduce the potential for crime and anti-social activities.
- Biodiversity resources should be protected and enhanced where possible through retention of vegetation/mature trees and soft landscaping. Disturbance to freshwater habitats and species during construction near the Waterfront could be minimised through appropriate construction management measures.

4.5 Appraisal of Opportunity Areas

4.5.1 The IP-One Opportunity Areas include the following:

- A- Island Site**
- B- Merchant Quarter**
- C- Mint Quarter and surrounding area**
- D- Education Quarter and surrounding area**
- E- Westgate**
- F- River Corridor and Princes Street Corridor**

4.5.2 The detailed assessments of the opportunity areas are included in Appendix G. The following section presents the summary of the findings.

Opportunity A – Island Site

- 4.5.3 The regeneration of Opportunity Area A – The Island Site will increase traffic in this area, which would have a negative effect on air quality. Opportunity Area A is close to but not within an Air Quality Management Area (AQMA). Green areas and the reinstatement of the tree lined promenade may have a positive effect on air quality and climate change. This Opportunity Area scores positively and negatively against ET1, ET4, ET6, and ER6.
- 4.5.4 Developments in Opportunity Area A are mostly on brownfield sites. There are proposals to include some green areas in this Opportunity Area, which may improve soil quality. This Opportunity Area scores positively against ET2.
- 4.5.5 Opportunity Area A includes residential developments, which would increase household waste in the Borough. Other uses in mixed use developments– offices, cafes and restaurants would also produce waste. This Opportunity Area scores negatively against ET3.
- 4.5.6 Regeneration and redevelopment of Opportunity Area A, would improve access to services and scores positive against ET5. This Opportunity Area provides for heritage/cultural based visitor attractions, marina moorings, retail, cafes and restaurants.
- 4.5.7 Opportunity Area A scores negatively against ET7 and ET8 since the area is within Flood Zones 2 and 3. Development has potential to increase flood risk. The area around Opportunity Area A – Island Site west of the Orwell River and the Wet Dock area is designated as a Country Wildlife Site. It is also close to the Orwell Estuary Special Protection Area. There is potential for developments to have a negative effect on the species and habitats on the river, such as disturbance to birds during construction, therefore mitigation measures should be implemented and HRA assessment should be undertaken for developments.
- 4.5.8 This Opportunity Area scores both positively and negatively against ET9 and ET10. There are no listed buildings on Opportunity Area A but it is within an area of archaeological importance. There is potential for new development to have an impact on archaeological resources within the area during construction periods. The conversion of historic buildings should be sensitive to the character of the buildings. The Opportunity Area refers to enhancing the setting of historic buildings such as Felaw Maltings. Opportunity Area A is within the Wet Dock Conservation

Area and there is potential to impact the character of the Conservation Area but also provides an opportunity to enhance townscape.

- 4.5.9 Opportunity Area A scores both positively and negatively against HW1. Opportunity Area A proposes residential developments, which would improve the housing stock within the Borough. Good quality housing will indirectly contribute positively to this SA Objective. However, new developments would increase traffic and affect air quality, which could also have a negative impact on health.
- 4.5.10 This Opportunity Area scores positively against HW2, ER1, ER2, ER3, ER4, ER5, and ER7. Opportunity Area A proposes employment, small scale retail, heritage and cultural based visitor attraction as well as public open space and waterfront promenade which would contribute to the quality of life within the Ipswich Waterfront. It would make some contribution to reducing poverty and social exclusion through providing communities with employment areas, key services and facilities. This policy supports employment, economic growth, housing, the town centre and district and local centres, and would encourage investment.
- 4.5.11 This Opportunity Area scores neutrally against CL1 (education). Opportunity Area A scores both positively and negatively against CD1. Crime levels may increase within the Opportunity Areas due to the increase in population, shops and businesses. However, increased employment opportunities and improved living standards may contribute to the reduction of crime.

Opportunity Area B – Merchant Quarter

- 4.5.12 This Opportunity Area scores negatively against SA Objective ET1. A section of the Opportunity Area B - Merchant Quarter is within an AQMA. This covers the area between Star Lane, College Street, and Fore Street. Increased development of sites in this area will result in increased traffic, which would have a negative effect on air quality. However, the area is accessible by public transport and pedestrian links are proposed, which may partially reduce traffic levels within the area and its impact on air quality.
- 4.5.13 The score for ET2 is uncertain. Developments in Opportunity Area B would mostly be located on brownfield sites. Remediation, if required, would improve soil quality.
- 4.5.14 This Opportunity Area scores negatively against ET3. Proposed residential developments would increase household waste in the Borough. Other uses in mixed use developments—offices, cafes and restaurants would also produce waste.
- 4.5.15 Opportunity Area B scores both positively and negatively against ET4 and ER6. Increased development within the Opportunity Area B would increase traffic as people from neighbouring areas may travel to this Quarter for shopping or work. However, pedestrian links are proposed in the Merchant Quarter. These would contribute partially towards reducing traffic levels within the town centre and may help encourage people to make more sustainable transport choices in the long term.
- 4.5.16 This Opportunity Area scores positively against ET5 since regeneration developments would increase access to services. Opportunity Area B provides for offices/businesses, cafes/restaurants and small scale retail.
- 4.5.17 This Opportunity Area B scores both negatively and positively against ET6. Opportunity Area B is accessible by public transport. This would help reduce the use of private cars and greenhouse gas emissions. Since the area is already built up, any development will be redevelopment of existing buildings. As such, it is unlikely that there would be impact on flood risk. This Opportunity Area scores neutrally against ET7.

- 4.5.18 This Opportunity Area scores negatively against ET8. Opportunity Area B is adjacent to the River Orwell and therefore new developments along the river have potential to impact habitats and species along the river, particularly during construction.
- 4.5.19 This Opportunity Area scores both positively and negatively against ET9, ET10 and HW1, There are a number of heritage assets (listed buildings and scheduled monuments) in Opportunity Area B, which is also in an Area of Archaeological Importance. There is potential for the listed buildings and their setting to be directly affected by new development during construction. However, this Opportunity Area refers to opportunities to reinforce existing historic character and Core Strategy Policies CS4, DM8 and DM9 offer some protection. This Opportunity Area lies between the Central and Wet Dock Conservation Areas and developments have the potential to impact the character of the Conservation Areas. Improved public realm may however enhance townscape character.
- 4.5.20 This Opportunity Area scores positively and negatively against HW1 since it proposes residential developments, which would increase the housing stock in the borough. However, new developments could increase traffic and affect air quality, which could also have a negative impact on health, whilst locating development in a location which provides opportunities for walking and cycling may have a positive effect on health, particularly through improving walking and cycling opportunities on Star Lane.
- 4.5.21 Opportunity Area B scores positively against HW2, ER1, ER2, ER3, ER4, ER5, and ER7. Opportunity Area B proposes residential, business, cafes and, small scale retail uses which provide key services and facilities to meet the needs of residents and improve the quality of life, within the Merchant Quarter and surrounding areas. It would make some contribution to reducing poverty and social exclusion through providing communities with employment areas, key services and facilities. This policy supports employment, economic growth, housing, the town centre and district and local centres, and would encourage investment.
- 4.5.22 This Opportunity Area scores neutrally against CL1 (education). Opportunity Area B scores both positively and negatively against CD1. Crime levels may increase within the Opportunity Areas due to the increase in population, shops and businesses. However, increased employment opportunities and improved living standards may contribute to the reduction of crime. The development of vacant sites and opening of spaces to further community use could lower anti-social behaviour records.

Opportunity Area C – Mint Quarter and Surrounding Area

- 4.5.23 Opportunity Area C- Mint Quarter is not within an AQMA but redevelopment of non-retail use, particularly residential and car parking would potentially increase traffic in the area. However, since the redevelopment would be located on an existing surface car park, the overall effect may depend on the number of new car parking spaces. In addition, this area is accessible by public transport and pedestrian links are proposed, which may reduce traffic and its impact on air quality. This Opportunity Area scores both positively and negatively against ET1.
- 4.5.24 The score for ET2 is positive. Developments in the Mint Quarter would be located on brownfield sites. Any contaminated sites would require a contaminated land risk assessment if developed. Remediation, if required, would improve soil quality.
- 4.5.25 This Opportunity Area scores negative against ET3. Proposed residential developments would increase household waste in the Borough. Other uses in mixed use developments– offices, cafes and restaurants would also produce waste.
- 4.5.26 Opportunity Area C scores both positively and negatively against ET4. Increased development within the Opportunity Area C would increase traffic. However, pedestrian links are proposed in the Mint Quarter. These would contribute partially towards reducing traffic levels within the town

centre and may help encourage people to make more sustainable transport choices in the long term.

- 4.5.27 This Opportunity Area scores positively against ET5 since regeneration developments would increase access to services. Opportunity Area C provides for offices/businesses, cafes/restaurants and small scale retail.
- 4.5.28 This Opportunity Area scores both negatively and positive against ET6. Opportunity Area C is accessible by public transport. This would help reduce the use of private cars and greenhouse gas emissions. However, developments within the Mint Quarter may result in increased use of private cars by people outside Ipswich and this would increase greenhouse emissions.
- 4.5.29 This Opportunity Area scores neutrally against ET7 and ET8. The Mint Quarter is not within a flood zone and it is within a built up area and there is limited potential to impact biodiversity and flood risk.
- 4.5.30 Opportunity Area C scores both positively and negatively against ET9 and ET10. There are a number of heritage assets in the Mint Quarter, which is also in an area of archaeological importance. There is potential for listed buildings and their setting to be directly affected by new development during construction but there are also improvements of the public realm proposed. Opportunity Area C is also partly within a Conservation Area and there is potential for developments to impact the character of the Conservation Area and townscape. However, there are also opportunities for enhancement, particularly in areas of low townscape value.
- 4.5.31 Opportunity Area C scores positively against HW2, ER1, ER2, ER3, ER4, ER5, and ER7. Opportunity Area C proposes residential, business, cafes and small scale retail uses which provide key services and facilities to meet the needs of residents and improve the quality of life, within the Mint Quarter and surrounding areas. It would make some contribution to reducing poverty and social exclusion through providing communities with employment areas, key services and facilities. This policy supports employment, economic growth, housing, the town centre and district and local centres, and would encourage investment.
- 4.5.32 This Opportunity Area scores neutrally against CL1 (education) since it does not contribute to this SA Objective. Opportunity Area C scores both positively and negatively against CD1.

Opportunity Area D – Education Quarter and surrounding area

- 4.5.33 The area along Star Lane, Grimwade Street, Fore Street and Duke Street within Opportunity Area D – Education Quarter is within an AQMA. Should car parking proposals result in an increase in spaces this may increase road traffic in this area, which would have a negative effect on air quality. This Opportunity Area scores negatively against ET1.
- 4.5.34 The score for ET2 is positive. Developments within the Education Quarter would mostly be located on brownfield sites. Remediation, if required, would improve soil quality.
- 4.5.35 This Opportunity Area scores negatively against ET3. Proposed residential developments would increase household waste in the Borough. Other uses in mixed use developments—offices, cafes and restaurants would also produce waste.
- 4.5.36 Opportunity Area D scores both positively and negatively against ET4. Increased development and proposed car parking within the Opportunity Area would increase traffic. However, improved pedestrian links are proposed within the Opportunity Area. These would contribute partially towards reducing traffic levels within the town centre and may help encourage people to make more sustainable transport choices in the long term.

- 4.5.37 This Opportunity Area scores positively against ET5 since regeneration developments would increase access to education related services. This Opportunity Area provides for residential, hotel, offices/businesses, cafes/restaurants and small scale retail.
- 4.5.38 This Opportunity Area scores both negatively and positively against ET6 and negatively against ET7. The Education Quarter is accessible by public transport, which would help reduce the use of private cars and greenhouse gas emissions. However, developments within the Education Quarter may result in increased use of private cars by people outside Ipswich and this would increase greenhouse emissions. Parts of the Education Quarter are within Flood Zone 2 and 3. Although development principles state that layout and design should reduce flood risk, development in these areas may increase surface run-off through increased impervious surface area.
- 4.5.39 This Opportunity Area scores neutrally against ET8. The southern section in Opportunity Area D is located adjacent to the Wet Dock, where car parks are proposed. The area is currently a hard surfaced car park. As such, redevelopment would not increase surface water run-off. The design of the new car park should ensure that surface water run-off is contained.
- 4.5.40 Opportunity Area D scores both positively and negatively against ET9 and ET10. There are a number of listed buildings in the Education Quarter, which is also in an area of archaeological importance. There is potential for the listed buildings and their setting to be directly affected by new development during construction. Small parts of the Education Quarter fall within the Central Conservation Area and there is potential for developments to impact the character of the Conservation Area and townscape. However, there are also opportunities for enhancement.
- 4.5.41 Opportunity Area D scores positively against HW2, ER1, ER2, ER3, ER4, ER5, and CL1. Opportunity Area D proposes academic facilities, student accommodation, hotel, business, cafes and, small scale retail uses which provide key services and facilities to meet the needs of residents and improve the quality of life. It would make some contribution to reducing poverty and social exclusion through providing communities with employment areas, key services and facilities. This policy supports employment, economic growth, housing, the town centre and district and local centres, and would encourage investment.
- 4.5.42 Opportunity Area D scores both positively and negatively against CD1. Crime within the Opportunity Areas may increase due to the increase in population, shops and businesses. However, increased employment opportunities and improved living standards may contribute to the reduction of crime. The development of vacant sites and opening of spaces to further community use could reduce the number of anti-social behaviour cases.

Opportunity Area E - Westgate

- 4.5.43 This Opportunity Area scores both positively and negatively against SA Objectives ET1, ET4 and ER6. The regeneration of Opportunity Area E – Westgate includes a pedestrian link and new level crossings which would improve pedestrian movement within the area. The area is not within an AQMA. However, high density residential housing and shoppers' car parking are proposed. Also, NO₂ emissions along St Matthews Street have been recorded as high.
- 4.5.44 The score for ET2 is positive. Developments within Westgate would mostly be located on brownfield sites. Some sites may need to be remediated before any redevelopment. Remediation would improve soil quality.
- 4.5.45 This Opportunity Area scores negatively against ET3. Proposed residential developments would increase household waste in the Borough. Other uses in mixed use developments—offices, cafes and restaurants would also produce waste.

- 4.5.46 This Opportunity Area scores positively against ET5 since the proposals would improve access to shops and cultural facilities such as the New Wolsey Theatre. This Opportunity Area provides for residential, café/restaurants, retail shops and car parking.
- 4.5.47 This Opportunity Area scores both negatively and positively against ET6. Westgate is accessible by public transport, which would help reduce the use of private cars and greenhouse gas emissions. However, developments within Westgate, including car parking, may result in increased use of private cars by people outside Ipswich and this would increase greenhouse emissions.
- 4.5.48 Opportunity Area E scores neutrally against ET7 and ET8 as Westgate is not within a flood zone and this is a built up area with low biodiversity value.
- 4.5.49 Opportunity Area E scores both positively and negatively against ET9 and ET10. There are a number of listed buildings in Westgate, which is also in an area of archaeological importance. There is potential for the listed buildings and their setting to be directly affected by new development during construction. Westgate is adjacent to the Central Conservation Area and developments have the potential to impact townscape. However, the proposals, including to the public realm, also represent opportunities for enhancement.
- 4.5.50 Opportunity Area E scores positively against HW2, ER1, ER2, ER3, ER4, ER5, and ER7. Opportunity Area E proposes shopping, residential, café/restaurant uses which provide key services and facilities to meet the needs of residents and improve the quality of life, within Westgate and surrounding areas. It would make some contribution to reducing poverty and social exclusion through providing communities with employment areas, key services and facilities. This policy supports employment, economic growth, housing, and the town centre, and would encourage investment.
- 4.5.1 This Opportunity Area scores neutrally against CL1 and both positively and negatively against CD1. Crime within the Opportunity Areas may increase due to the increase in population, shops and businesses. However, increased employment opportunities and improved living standards may contribute to the reduction of crime. The development of vacant sites and opening of spaces to further community use could reduce the number of anti-social behaviour cases.

Opportunity Area F – River Corridor and Princes Street Corridor

- 4.5.2 Opportunity Area F – River Corridor and Princes Street Corridor are not within or near AQMAs. The area of car parking to the east of Portman Road has been identified as having potential for a mixed use development. The allocation would require replacement of the car parking on the site or at the site on West End Road. Although the large car park will be removed, it will need to be replaced nearby. As such, the development would have a neutral effect on transport and air quality. However, new pedestrian and cycle links are proposed along the Waterfront area which would reduce car use and its impact on air quality. Overall, this Opportunity Area scores positively against ET1, ET4 and ER6.
- 4.5.3 The score for ET2 is positive. Developments within the River Corridor and Princes Street Corridor would mostly be located on brownfield sites. Remediation, if required, would improve soil quality.
- 4.5.4 Opportunity Area F would be mainly offices and leisure uses and is expected to produce waste.
- 4.5.5 This Opportunity Area scores positively against ET5 since regeneration developments would increase access to shops and cultural facilities such as the New Wolsey Theatre. This Opportunity Area provides for residential, café/restaurants, retail shops and car parking.

- 4.5.6 Opportunity Area F scores both negatively and positively against ET6 and negatively against ET7. The River Corridor is near the railway station and the Princes Street Corridor links the station to the centre of town. There are proposals to enhance the riverside connection to the Waterfront Area as a setting for new pedestrian and cycling links. The River Corridor is within Flood Zone 2 and 3. Development in the area may increase flood risk.
- 4.5.7 This Opportunity Area scores negatively against ET8. Opportunity Area F is along the River Corridor and east of Princes Street is a Country Wildlife site. New development may have negative impacts on species and habitats along the river (e.g. noise disturbance).
- 4.5.8 Opportunity Area F scores neutrally against ET9 and both positively and negatively against ET10. There is a listed building in the area and there is potential for new development to impact the listed building or its setting. However, the potential impact is considered negligible. This Opportunity Area proposes an improved public realm in front of the station, which would contribute to the visual amenity in the area.
- 4.5.9 Opportunity Area F scores positively against HW1, HW2, ER1, ER2, ER4, ER5, and CL1. Opportunity Area F proposes leisure uses, which would have an indirect positive effect on health. It would contribute to the quality of life for commuters and also the residents along Princes Street and nearby areas. Office led mixed use development is proposed, which would make some contribution to reducing poverty and social exclusion through providing communities with employment areas, key services and facilities. This policy supports employment, economic growth and would encourage investment.
- 4.5.10 This Opportunity Area scores neutrally against ER3 as no residential use is proposed.
- 4.5.11 Opportunity Area F scores both positively and negatively against CD1. Crime within the Opportunity Areas may increase due to the increase in population, shops and businesses. However, increased employment opportunities and improved living standards may contribute to the reduction of crime.

Recommendations for Mitigation Measures

- 4.5.12 The following recommendations are proposed for the Opportunity Areas:
- It is recommended that all Opportunity Areas should make reference to improving walking and cycling routes in these areas.
 - It is recommended that Opportunity Areas should include a reference to providing landscaped areas and green spaces where practicable.
 - It is recommended that Opportunity Areas should include reference to the provision of adequate waste facilities and where possible recycling facilities within the areas.
 - It is recommended that these Opportunity Areas include reference to ensuring that new development does not exacerbate current flood risk issues in the area and encourage the use of SuDS.
 - It is recommended that ecological assessments should be undertaken during the design phase of development proposals which are likely to affect biodiversity resources.
 - It is recommended that Opportunity Areas make reference to incorporating secured by design principles which would contribute towards reducing the potential for crime and anti-social activities.

4.6 Cumulative effects

- 4.6.1 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).
- 4.6.2 The assessment of the policies and site allocations 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 or site allocations 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.
- 4.6.3 Table 4-6 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. The cumulative and synergistic effects identified in the table are all considered to be significant effects.

Table 4-6 Cumulative and Synergistic Effects

Topic/SA Objective	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
Education provision and educational attainment (CL1 To maintain and improve access to education and skills for both young people and adults)	Positive	Educational attainment in the borough is generally lower than regional and national levels. The policies/site allocations are likely to generate positive effects upon educational attainment through the allocation of land for employment use, primary and secondary schools and where necessary for students accommodation. New and diverse employment provision is likely to increase training opportunities, and encourage local partnerships and initiatives. All the residential site allocations in the IP-One area may benefit from the close location of University Campus Suffolk and Suffolk New College.
Crime and Fear of Crime (CD1 To minimise potential opportunities for crime and anti-social activity)	Positive/Negative	Crime levels are generally higher across the borough when compared to national average figures. The projected housing and population growth may result in a significant increase of new residents. This increase in population may have a negative effect on crime within the Borough in the short term, however it can be mitigated cumulatively through improved quality of life. The level of certainty of prediction is low as many factors could influence the crime levels.
Access to services (ET5 To improve access to key services for all sectors of the population)	Positive/Negative	Cumulatively, access will be improved where sites are located in the town centre near existing facilities and employment hubs. However, if all the sites are taken forward negative effects associated with access could occur on key roads in the town centre or the approach roads due to increased traffic and congestion. Mitigation measures will be required to reduce the negative effects, e.g. improved transport links, pedestrian infrastructure, etc.
Health and Well-Being (HW1 To improve the health of those most in	Positive	Whilst health and well-being is affected by a number of factors, there is the potential to improve well-being by delivery of new housing and employment, areas of open/green space and the

Topic/SA Objective	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
<p>need</p> <p>HW2 To improve the quality of life where people live and encourage community participation)</p>		<p>provision of new schools. There could be indirect benefits for health and well-being within areas where sites are allocated for new parks, river paths, and playing grounds.</p> <p>Many of the policies seek enhancements for walking and cycling which would potentially improve health.</p>
<p>Housing</p> <p>(ER3 To help meet the housing requirements for the whole community)</p>	Positive	<p>Cumulatively, the site allocations for residential use should ensure that new housing development occurs in the most appropriate locations and meets the needs of a wide range of people. The residential site allocations should be planned in a way that it does not lead to oversupply of flats particularly in the town centre.</p>
<p>Sustainable Economic Growth</p> <p>(ER4 To achieve sustainable levels of prosperity and economic growth throughout the plan area)</p>	Positive	<p>Cumulatively, the site allocations for employment/retail/office use 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. The sites will contribute to the regeneration / redevelopment of central town areas, with some infrastructure improvements (car parking, the replacement of an electricity substation, etc.) which may increase the business attractiveness of the area.</p>
<p>Biodiversity – protection of designated sites</p> <p>(ET8 To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs)</p>	Negative/Positive	<p>Cumulatively, the site allocations will have both negative and positive effects on biodiversity. Negative effects are identified where TPOs could potentially be affected by development. In addition, sites allocations near the River Orwell may result in disturbance of species during construction activities. The redevelopment of brownfield sites would provide opportunities for enhancements, particularly where this relates to improving connections.</p> <p>Some positive effects may occur as a result of the delivery of open space but cumulatively the amount of land allocated for open space does not suggest a significant positive effect. The remediation of contaminated land may have positive indirect effects in the long term.</p>
<p>Landscape/Townscapes</p> <p>(ET10 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes)</p>	Negative/Positive	<p>Cumulatively, there is potential for urban expansion and projected growth to have a negative effect on landscape through the loss of greenfield sites, when considered with the development of the Garden Suburb. Cumulative impacts on townscape are due to significant changes in townscape character and the concentration of a great number of listed buildings in the town centre. However, there are proposals for the improvement of public realms, which would contribute to enhance the townscape through redevelopment of brownfield sites and overall regeneration of the town centre.</p>
<p>Climate Change</p> <p>Air Quality</p> <p>Energy Efficiency</p> <p>Natural Resources</p> <p>Sustainable Transport</p> <p>Transboundary</p>	Positive/Negative	<p>The policies in the Site Allocations DPD have 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. However at the same</p>

Topic/SA Objective	Cumulative / Synergistic Effect (Positive, Negative, Neutral)	Commentary and Causes
(ET1 To improve air quality ET4 To reduce the effects of traffic upon the environment ET6 To limit and adapt to climate change ER6 To encourage efficient patterns of movement in support of economic growth ET3 To reduce waste)		<p>time, new development and population growth along with the number of cars in the borough would have adverse effects on sustainable travel, air quality and climate change. The development of sites overall and combined with Ipswich Garden Suburb may lead to increases in traffic and air quality issues; however it is uncertain at this stage whether this could significantly affect the AQMAs.</p> <p>There is a degree of uncertainty about these cumulative effects being realised as this is reliant upon travel choices of individual residents and workers.</p> <p>Transboundary issues relate to people travelling to and from Ipswich for shopping or work. Although there may be increase in retail and employment uses, these are not considered significant and any traffic impacts are not considered significant.</p> <p>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 (ET7 To protect and enhance the quality of water features and resources and reduce the risk of flooding)	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 site allocations assessment 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 grey water recycling systems to reduce domestic water use.</p>

5 MONITORING FRAMEWORK

5.1.1 This section provides an outline monitoring framework and advice for monitoring the significant effects of implementing the Site Allocations DPD. Monitoring is an ongoing process integral to the Site Allocations DPD implementation, and can be used to:

- Determine the performance of the plan and its contribution to objectives and targets;
- Identify the performance of mitigation measures;
- Fill data gaps identified earlier in the SA process;
- Identify undesirable sustainability effects; and
- Confirm whether sustainability predictions were accurate.

Requirements of the SEA Directive

The activities relevant to monitoring that are stipulated in the SEA Directive are outlined in Box 4. The outcomes of these activities are detailed in this section.

Box 4: SEA Directive Requirements Applicable to Monitoring

“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” (Article 10.1).

The Environmental Report should provide information on “a description of the measures envisaged concerning monitoring” (Annex I (i)).

Approach

The monitoring framework has been developed to measure the performance of the Site Allocations DPD against changes in defined indicators that are linked to its implementation. These indicators have been developed based on the following:

- The objectives, targets and indicators that were developed for the SA Framework;
- Features of the baseline that will indicate the effects of the plan;
- The likely significant effects that were identified during the effects assessment; and
- The mitigation measures that were proposed to offset or reduce significant adverse effects.

The monitoring framework has been designed to focus mainly on significant sustainability effects including those:

- That indicate a likely breach of international, national or local legislation, recognised guidelines or standards.
- That may give rise to irreversible damage, with a view to identifying trends before such damage is caused.
- Where there was uncertainty in the SA, and where monitoring would enable preventative or mitigation measures to be taken.

As well as measuring specific indicators linked to the implementation of the Site Allocations DPD, contextual monitoring of social, environmental and economic change has been included

i.e. a regular review of baseline conditions in the borough. This enables the measurement of the overall effects of the plan.

There are numerous SA indicators available and it is not always possible to identify how a specific plan has impacted a receptor, for example housing provision is likely to be influenced by a number of actions and different plans. A thorough analysis of the data collated and the emerging trends will, therefore be important.

Existing Monitoring Programmes

A fundamental aspect of developing the monitoring strategy is to link with existing monitoring programmes and to prevent duplication of other monitoring work that is already being undertaken. The Ipswich AMR identifies a series of indicators that can be used to monitor progress. The proposed monitoring framework presented in Table 5-1 has also been 'tied in' with the proposed monitoring framework for the Site Allocations DPD.

Proposed Monitoring Framework

Table 5-1 provides a framework for monitoring the effects of the Site Allocations DPD and determining whether the predicted sustainability effects are realised. The framework is based around the SA Objectives and includes the following elements:

- The potentially significant impact that needs to be monitored or the area of uncertainty;
- A suitable monitoring indicator;
- A target (where one has been devised);
- The potential data source; and
- The frequency of the monitoring.

For some of the SA Objectives, for example those relating to townscape character and quality, it will be necessary for baseline characteristics and contextual information to be reviewed.

The impacts predicted in the SA will not be realised until development occurs through the Site Allocations DPD.

Monitoring should be ongoing during the whole life of the plan. The targets identified in Table 5-1 will therefore need to be reviewed and updated as new ones are developed and existing ones modified. In addition new or more appropriate indicators may also be developed as more information is gathered and the SA process and Site Allocations DPD further develops.

It should be noted that benefits would be realised from monitoring at different geographical scales. As this is a strategic assessment, it is important to consider the overall changes to Ipswich Borough Council as a whole, as well as considering the changes within individual settlements and the relevant local wards.

It should be noted that a number of socio-economic indicators are not measurable at the very local level. However, as this is a strategic assessment it is important to consider the overall changes to Ipswich as a whole in addition to individual settlements and changes to the local wards. They have, therefore been included to provide a context and to understand how the plan could lead to changes across Ipswich.

Those indicators written in italics highlight current data gaps which will be reviewed and additional information gathered where possible.

Table 5-1 focuses upon indicators which are relevant to the monitoring of the likely significant effects within Ipswich as a result of the Site Allocations DPD.

Table 5-1 Proposed Monitoring Framework

SA Objective	Effect to be Monitored	Indicator and Target (targets and sources are provided where relevant)	Review Timescale
ET1. To improve air quality ET4. To reduce the effects of traffic upon the environment ET6. To limit and adapt to climate change	The Site Allocations DPD is committed to promoting the use of sustainable transport. It would contribute to sustainable transport through the provision of housing, jobs and facilities in accessible locations which would support and encourage sustainable movement. It may also result in an increase in traffic which would have an uncertain effect on local air quality.	<p>Access to services and facilities by public transport, walking and cycling: To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031 (Ipswich Borough Council).</p> <p>Number and distribution of AQMAs: No new AQMAs to be designated in the borough (Defra).</p> <p>Per capita CO₂ emissions in the local authority area: To reduce Ipswich's estimated carbon footprint by 60% from the 2004 base level by 2025 (Ipswich Borough Council).</p> <p>Annual average domestic gas and electricity consumption: To reduce the Annual average domestic gas and electricity consumption (DECC).</p>	Every three years.
ET2. To conserve soil resources and quality	The Site Allocations DPD will seek to develop on brownfield land as a priority which represents a sustainable use of soil resources.	<p>Percentage of development on previously developed land: Over the plan period, 75% of major developments to take place in IP-One, District Centres or within 800m of District Centres. (Ipswich Borough Council).</p> <p>Area of contaminated land returned to beneficial use: Target to be established (Ipswich Borough Council).</p> <p>Density of new residential development: At least 90 dph in the town centre, Ipswich Village and Waterfront, a minimum of 40 dph around district centres and an average of 35dph elsewhere (Ipswich Borough Council).</p>	Every three years
ET3. To reduce waste	The Site Allocations DPD will seek to provide waste disposal and recycling facilities where possible with new development and encourage the reduction of waste. The Site Allocations DPD will seek to minimise the amount of waste generated during construction and through the lifetime of the buildings. However, overall waste is likely to increase due to the proposed levels	<p>Tonnage of household waste produced and recycled: To recycle or compost at least 33% of household waste (Suffolk County Council).</p> <p>Amount of residual waste (i.e. not recycled) per household: To reduce the amount of residual waste collected per household in Ipswich.</p>	Annual

SA Objective	Effect to be Monitored	Indicator and Target (targets and sources are provided where relevant)	Review Timescale
	of growth.		
ET5. To improve access to key services for all sectors of the population	The Site Allocations DPD contains provisions for improving accessibility and connectivity within the borough which would meet the needs of all communities.	<p>Location of new development: Over the plan period, 75% of major developments to take place in IP-One, District Centres or within 800m of District Centres.</p> <p>Number of LSOAs with wards in bottom 10% of most deprived in terms of barriers to housing and services provision: Reduce the number of wards with LSOAs in the bottom 10% most deprived in terms of barriers to housing (IMD).</p>	Every three years
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	All development has the potential to impact upon water quality and resources and could increase flood risk in flood zone areas. A large portion of the proposed growth lies within Flood Zone at present.	<p>Water quality in rivers and groundwater quality: Aim to achieve at least good status for all water bodies by 2015 (Environment Agency).</p> <p>Daily domestic water use (per capita consumption, litres): To increase water efficiency measures in new development (Anglian Water).</p> <p>Number of planning applications granted permission contrary to Environment Agency advice: No planning applications permitted contrary to Environment Agency advice on flooding (Ipswich Borough Council).</p> <p>Flood and Coastal Erosion Risk Management: Implementation of the tidal surge barrier by 2017 (Ipswich Borough Council).</p>	Annual
ET8. To conserve and enhance biodiversity and geodiversity, including favourable conditions on SSSIs, SPAs and SACs	The Site Allocations DPD seeks to conserve and enhance local biodiversity and to protect the borough's green infrastructure. It also seeks to create new open spaces and to link ecological and green corridors across Ipswich. Some development has potential to affect habitats and connectivity.	<p>Extent and condition of key habitats for which Biodiversity Action Plans have been established: To maintain / enhance condition of BAP habitats. Not recorded in AMR, Where would the data be</p> <p>Net change in extent of protected habitat: No net loss of natural capacity. To increase the tree canopy cover in the borough to 22% by 2050 (Ipswich Borough Council).</p>	Annual
ET9. To conserve and enhance the historic environment, heritage assets and their settings ET10. To conserve and enhance the quality and local distinctiveness of landscapes and	Development built to a high quality design along with heritage protection measures outlined in the Site Allocations DPD would help to protect and enhance local townscape. Uncertain effects on some heritage assets including archaeology.	<p>Number of heritage assets 'at risk': Six currently on this list. Target – to have none on the list (English Heritage).</p> <p>Landscape character and Conservation Area appraisals: to demonstrate no deterioration in quality of landscape/townscape.</p>	Every five years

SA Objective	Effect to be Monitored	Indicator and Target (targets and sources are provided where relevant)	Review Timescale
townscapes			
HW1. To improve the health of those most in need HW2. To improve the quality of life where people live and encourage community participation	Provision of new open spaces, better quality housing, sport and community facilities and new employment opportunities are important factors that affect health, quality of life and community participation. An increase in walking and cycling can also increase levels of health and wellbeing.	Number of wards in the bottom 10% most deprived (Department for Communities and Local Government): Reduce the number of wards with LSOAs in the bottom 10% most deprived (Index of Multiple Deprivation). Adult participation in Sport: To increase the levels of adults participating in physical activity. Area of open space created through new development: To increase provision.	Every three years
ER1. To reduce poverty and social exclusion	The Site Allocations DPD promotes significant growth within Ipswich including the provision of new homes, community facilities and employment opportunities which overall could help to reduce deprivation.	Proportion of population who live in wards that rank within the 10% most deprived in the country: Reduce the number of wards with LSOAs in the bottom 10% most deprived (Index of Multiple Deprivation).	Every three years.
ER2. To offer everybody the opportunity for rewarding and satisfying employment	Over the plan period the creation of jobs along with economic development within accessible areas would provide the foundations to improve existing income and employment deprivation along with reducing unemployment within areas most at need.	Unemployment rate: To improve Ipswich's rank in the indices of multiple deprivation by 2031 for income and employment deprivation (IMD). Employment opportunities: To deliver up to 12,500 jobs by 2031 (Ipswich Borough Council) Average wage: To increase the average wage within Ipswich. Joint working taking place through the IPA Board (or other equivalent forum): To achieve effective cross boundary working on housing, strategic greenspace and employment site provision.	Every three years
ER3. To help meet the housing requirements for the whole community	The Site Allocations DPD would lead to residential development across the borough which would help widen the choice, quality and affordability of housing. The provision of student accommodation, residential units,	Number of new dwellings achieving a minimum Level 4 Code for Sustainable Homes Standard: At least 75% of new dwellings gaining planning permission in any year to achieve a minimum Level 4 Code for Sustainable Homes standard. Affordable housing provision In Ipswich: 15% in the Borough outside of the Garden Suburb (Ipswich Borough Council). Living environment deprivation: To improve Ipswich's rank for living environment	Every three years

SA Objective	Effect to be Monitored	Indicator and Target (targets and sources are provided where relevant)	Review Timescale
	pitches for Gypsies and Travellers.	deprivation (IMD). Number of housing completions: To meet local need (Ipswich Borough Council). Percentage split of dwelling types (i.e. number of 1 bed, 2 bed, 3 bed etc): To meet local need (Ipswich Borough Council).	
ER4. To achieve sustainable levels of prosperity and economic growth throughout the plan area ER5. To support vital and viable town, district and local centres	The Site Allocations DPD seeks to enhance the town centre and to provide improvements to district and local centres. Enhancements and improvements would help to attract visitors, support investment and improvements would support the viability of these areas.	Development distribution: Over the plan period, 75% of major developments to take place in IP- One, District Centres or within 800m of District Centres. Take up of employment land: To provide a minimum of 30ha (Ipswich Borough Council). Unemployment in Ipswich: To reduce the number of people unemployed in Ipswich. No. / Percentage of vacant retail units: Target to be established. Percentage of new retail floorspace developed within defined centres: Target to be established.	Every three years
ER6. To encourage efficient patterns of movement in support of economic growth ER7. To encourage and accommodate both indigenous and inward investment	The Site Allocations DPD seeks to create attractive conditions for business development and economic growth focusing on those areas most in need of regeneration with elevated levels of deprivation.	Travel to work percentage by mode: To increase the proportion of the population travelling to work by sustainable transport. No. of business enquiries to Ipswich Borough Council / Suffolk County Council by types and size of site: Target to be established. Employment land availability: To provide a minimum of 30ha (Ipswich Borough Council).	Every five years
CL1. To maintain and improve access to education and skills for both young people and adults	The Site Allocations DPD seeks to provide new educational facilities including new schools and extensions to existing facilities in accessible location and also to make improvements to existing facilities.	GCSE Attainment Levels (Grades A*-C): Defined target yet to be established though levels of attainment should be increased over time to match regional and national averages. Proportion of the population with no qualifications: To reduce the proportion of the population with no qualifications (ONS). Pupil to teacher's ratios and percentage of community facilities within 800m of a centre: Target to be developed (Ipswich Borough Council).	Annual
CD1. To minimise potential opportunities for crime and antisocial activity	Provisions focused in particular within central Ipswich and the town centre have the potential to help minimise crime through	Recorded crime per 1,000 population: - To tie in with Police targets relating to reducing crime levels by 2031 (Ipswich Borough Council). Fear of Crime (Quality of Life, Suffolk Speaks, British Crime Survey): Target to be	Annual

SA Objective	Effect to be Monitored	Indicator and Target (targets and sources are provided where relevant)	Review Timescale
	regeneration benefits and security by design measures.	established.	

6 NEXT STEPS

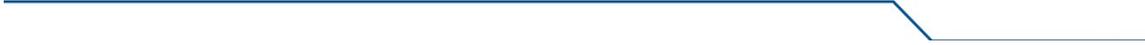
- 6.1.1 This SA report is being issued for comment alongside the Proposed Submission Site Allocations DPD from 12th December 2014 to 5th March 2015. Following the end of the consultation period the Site Allocations DPD and accompanying documents including this SA Report will be submitted for Examination along with any comments received.

Appendix A



Review of Plans, Programmes and Policies

Appendix B



Baseline Data

Appendix C

Scoping Letter Comments and Summary of Comments and Responses received Jan-March 2014

Alternative Site Uses

Appendix E

Assessment of SP Policies

Sustainability Matrix Site Allocations

Sustainability Matrix Opportunity Areas